

Freshcare Privacy Policy

1. General Policy

Freshcare Limited ABN 45 092 879 082 (Freshcare) respects the privacy of individuals and takes seriously our obligations under the Privacy Act 1988 (Cth) and the associated 13 Australian Privacy Principles.

This policy sets out how Freshcare collects, maintains, uses and discloses personal information in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). Specifically, this policy sets out:

- (a) the kinds of personal information that Freshcare collects (including online collection) and holds;
- (b) how Freshcare collects and holds personal information;
- (c) the purposes for which Freshcare collects, holds, uses and discloses personal information;
- (d) how you may access personal information about you that is held by Freshcare and seek correction of it; and
- (e) how you may complain about a breach of the Australian Privacy Principles and how Freshcare will deal with such a complaint.

2. Collection of your personal information

When Freshcare collects personal information, it is collected and held for its relevant business purposes, which is the development and maintenance of certification standards and the provision of training and support services for the agriculture, horticulture and viticulture industries of Australia.

Where Freshcare documents require personal information, Freshcare will generally state the purpose for its use and to whom the personal information may be disclosed.

Freshcare collects and holds information including the following:

- (a) business name, contact name, addresses, telephone numbers and email addresses of trainees, participating businesses and customers of Freshcare eStore;
- (b) information obtained from Certification Bodies for audit and certification processes; and
- (c) other information for Freshcare program purposes, which is reasonably necessary for, or directly related to, our business functions or activities.

Where a party uses the SafetyCulture platform for completion of Freshcare template documents for their Freshcare assurance program, the information can be viewed by Freshcare. Freshcare may also collect and hold that information in accordance with this Privacy Policy.

You may, in some circumstances, have the option of not identifying yourself or using a pseudonym when you deal with Freshcare, such as if you are making a general enquiry. However, if you choose not to provide the information, we may not be able to provide you with the service you request.

Freshcare will normally collect personal information directly from you, via a Freshcare Trainer or Freshcare Certification Body. Freshcare may also collect personal information from other third parties. Freshcare may collect personal information through their websites, face-to face meetings, in documents or forms or during communications with you or with the Freshcare Trainers and Certification Bodies. Where necessary, Freshcare may supplement the information we receive directly from you with information from third party sources.

For information about the collection of your personal information online, refer to **Section 7** of this policy.

3. How your information is held

Personal information obtained by Freshcare is stored in-house in web-based data platforms. Personal information may be accessed by Freshcare's IT providers, which assist with maintaining Freshcare's databases and websites. Necessary contractual measures are taken with the providers of these services to protect this information.

4. Use of your personal information

Personal information provided by you to Freshcare will be used for the primary purpose of providing program services to you, and for other secondary purposes you might reasonably expect us to use relating to that primary purpose. Freshcare may use the personal information collected to fulfil our legal obligations and to keep participating businesses and stakeholders informed of Freshcare activities and the services that we provide.

Freshcare may from time to time send you marketing material that we consider will be useful to you. Freshcare may also send you material about our activities in the form of emails and newsletters. If you do not wish to receive this information, you can let us know and we will not send it to you unless we are legally required or authorised to send it.

For information about the use of your personal information collected online, refer to **Section 7** of this policy.

5. Disclosure of your personal information

Generally, Freshcare will only disclose your personal information for the purposes for which it has been collected.

Depending on the service, Freshcare may disclose your personal information to:

- (a) companies with which Freshcare has information exchange agreements;
- (b) specialist advisers to Freshcare who have been engaged to provide legal, administrative, financial, insurance, research, marketing or other services; and
- (c) any other person authorised by you, including Freshcare Trainers and Certification Bodies.

Freshcare may at other times notify you about our disclosure practices in relation to specific services that we provide.

Subject to the requirements of the Australian Privacy Principles, your personal information may also be disclosed:

- (a) for another purpose if you would reasonably expect the information to be disclosed for that other purpose; or
- (b) for purposes to which you have consented; and
- (c) if collected for the Freshcare Program, in accordance with the Freshcare Rules (available on the Freshcare website) as amended from time to time.

Freshcare may disclose personal information to a third party if the disclosure is necessary to prevent or lessen a serious and imminent threat to the life, health or safety of you or another person and it is unreasonable or impracticable to obtain your consent.

Freshcare will not otherwise disclose your personal information without your consent unless otherwise authorised by law.

6. Security of your personal information

Freshcare will take all reasonable steps to protect your personal information from loss, unauthorised access, modification, disclosure, interference or other misuse.

7. Online collection of personal information

Personal information collected online

When you access the Freshcare website, eStore, or eLearning, it will keep a record of your visit and log the following information for statistical purposes:

- (a) your public facing IP address;
- (b) the date and time of your visit to the site;
- (c) the pages you accessed and documents downloaded;
- (d) the previous site you have visited; and
- (e) the type of browser you are using.

Freshcare will not attempt to identify users or their browsing activities. However, in the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect the Freshcare internet service provider's logs.

Any information collected by Freshcare is collected via correspondence from you or your company. This may be via the telephone, email, mail, or directly through our website.

Use of personal information collected online

There are many aspects of the Freshcare website which can be viewed without providing personal information, however, for access to FreshcareOnline, Freshcare eLearning, or making purchases via the Freshcare eStore, you are required to submit personally identifiable information. The personally identifiable information collected online will be used for the purposes of providing the outlined services and meeting the criteria, as specified in **Section 4** of this policy.

Freshcare will only record your email address if you send them a message, request access to FreshcareOnline or Freshcare eLearning, or make a purchase via the Freshcare eStore. Your email address will only be used for the purpose for which you have provided it, and it will not be added to a mailing list or used for any other purpose without your consent.

The security of your personal information is important to Freshcare. When you enter payment information (such as credit card numbers) on the Freshcare website, Freshcare eStore or Freshcare eLearning, the information is encrypted using Transport Layer Security technology (TLS). Credit card processing occurs through third party applications and details of how these are processed can be accessed directly via our policies:

- eStore Policy: www.freshcare.com.au/shop/freshcare-online-shop-policies/
- eLearning Policy: www.freshcare.com.au/elearning/pages/elearning-policies

When Credit Card details are entered, they are passed on in an encrypted format to allow the order to be processed as required. Freshcare never permanently store complete Credit Card details.

Freshcare follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once it is received. If you have any questions about security on the Freshcare website, contact Freshcare via the details provided below.

8. Cookies

To improve your experience on the Freshcare website, FreshcareOnline, Freshcare eLearning and the Freshcare eStore, 'cookies' may be used.

Cookies are an industry standard used by most websites. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences or maintain logged-in sessions. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, if you do this you may not be able to use the full functionality of our sites.

Please be aware that our websites may contain links to other websites. We are not responsible for the privacy practices of other such websites and recommend you read individual privacy policies.

The Freshcare website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using the Freshcare website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy- external site](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google- external site](#).

9. Sensitive personal information

Freshcare does not generally collect any sensitive information as that term is used in the *Privacy Act 1988* (including information relating to your racial or ethnic origin, membership of political bodies, religion or trade unions, sexual preferences or activities, criminal record, state of health or medical history). If Freshcare holds any sensitive personal information about you, that information will only be used and disclosed for the purpose for which it was provided by you.

10. Access to your personal information

At any time, you may request access to personal information about you that Freshcare holds, by contacting Freshcare via the details provided below. Freshcare will process your request within five (5) business days.

If Freshcare are not legally required to provide access to the personal information requested and do not exercise our discretion to do so, we will let you know our reasons for that.

11. Correction of your personal information

You should promptly notify Freshcare (in writing) if there are any changes to your personal information. You may ask Freshcare at any time to correct personal information held about you by contacting Freshcare via the details provided below.

12. Dealing with complaints

If you have a complaint relating to a breach of the Australian Privacy Principles by Freshcare, you should contact Freshcare via the details provided below. Freshcare will, as the case may be, investigate your complaint and respond to you in accordance with our complaints policy, within five (5) business days and in accordance with our legal obligations. Freshcare will take any necessary corrective actions promptly.

13. Changes to this policy

Freshcare may amend this policy from time to time, and the policy will be published on the Freshcare website www.freshcare.com.au

14. Contact details

Freshcare welcomes your comments regarding this policy.

If you have any questions about this policy or would like further information, please contact us by any of the following means:

- Telephone: 02 8039 9999
- Email: info@freshcare.com.au
- Postal address: PO Box 247, Sydney Markets NSW 2129