



tasmanian
independent
retailers



island fresh
PRODUCE

CG01 PRIVACY POLICY

CORPORATE GOVERNANCE POLICIES

VERSION 3: 28 DECEMBER 2018

TIR BOARD APPROVED - MARCH 2014

Contents

Purpose.....	2
Types of Personal Information Collected	2
How TIR Collects Information	2
Why TIR Collects, Uses and Discloses Personal Information	3
How TIR Stores and Protects Personal Information.....	4
Does TIR Send Personal Information Overseas?.....	4
How You Can Access Your Personal Information?	4
Cookies	4
How To Contact TIR or Make a Complaint?.....	5
Changes, Linked Documents, Authorisation, Effective & Evaluation Dates	5
Evaluation History	5

Purpose

Tasmanian Independent Retailers (TIR) ACN 89 743 048 843, its related bodies corporate and its business pillars (collectively, “TIR”, “IGA Tasmania”, “Island Fresh Produce” “IFP”, “we”, “our” or “us”) is committed to the protection of personal privacy within the scope of applicable law. This Privacy Policy covers Tasmanian Independent Retailer's treatment of personal information that we collect, use and disclose.

Tasmanian Independent Retailers may update this Privacy Policy from time to time. The most current version will be located on the Tasmanian Independent Retailers websites, (www.igatas.com.au and www.tir.com.au), and is also available by contacting our Privacy Officer by email or at the address detailed below.

By using any of the Tasmanian Independent Retailers websites, or by providing any personal information to Tasmanian Independent Retailers, you consent to the collection, use and disclosure of your personal information as set out in this Privacy Policy.

Types of Personal Information Collected

The types of personal information collected and held by Tasmanian Independent Retailers will vary depending on your dealings with us.

This information may include any or all of the following:

- name, address(es), telephone number(s) and other contact details;
- associated company name(s), position, occupation and other business details;
- electronic address(es);
- credit card details; and
- transaction details relating to your use of our products, services or benefits.
- We will also collect your date of birth where required (for example, to comply with age restrictions).
- Employment details such as tax file numbers, next of kin, relevant medical information.

From time to time, you may provide us, and we may collect from you, personal information of a third party (for example, for delivery purposes). Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this Privacy Policy, understand it and agree to accept it.

Tasmanian Independent Retailers will not collect sensitive information from you or any third party. TIR allows anonymity and pseudonymity as per APP2.

You do not have to provide us with any personal information, however if you do not do so we may not be able to complete a transaction you have entered into, finalise payment of a product or service you have ordered, make delivery of a product you have ordered, validate your entry in a promotion, or otherwise provide you with the products, services or benefits you have requested.

How TIR Collects Information

Generally, Tasmanian Independent Retailers collects personal information directly from you, such as:

- when you personally submit information through a Tasmanian Independent Retailers website;
- in person (such as in store);
- in the course of recruitment and employment;
- when you enter into a promotion conducted by us or a third party;
- when you complete a survey;
- in the course of us providing you with a requested product, service or benefit; or
- when you have other dealings with us.

Tasmanian Independent Retailers will collect personal information through:

- Tasmanian Independent Retailers, its related bodies corporate and its business pillars;
- our business partners who may partner with Tasmanian Independent Retailers for promotional activities; and
- third parties who supply services to Tasmanian Independent Retailers.

Why TIR Collects, Uses and Discloses Personal Information

Tasmanian Independent Retailers will use the personal information it collects for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. Tasmanian Independent Retailers will not use your personal information for any other purpose without first seeking your consent, or where authorised or required by law.

Tasmanian Independent Retailers will collect personal information for the following purposes:

- to establish and maintain your relationship with us, including in some cases disclosing your name and address (as required by law, such as to government authorities and agencies) and providing you with information necessary to allow you to remain in contact with Tasmanian Independent Retailers;
- to provide the products or services you have requested from us and keep a record of them;
- to provide credit to you, which may include disclosures to credit reporting agencies;
- to answer any inquiry you make;
- to register you for events or promotions; or
- to assist us to make our services and products more valuable or useful to you.

Tasmanian Independent Retailers may also disclose your personal information to third parties who work with us in our business to provide, promote or improve the products or services you have requested or are interested in, such as:

- manufacturers and suppliers;
- couriers and delivery contractors;
- marketing consultants and promotions companies;
- website hosts; and
- consultants and professional advisers.

Tasmanian Independent Retailers will also use and disclose your personal information to send direct marketing to you from:

- Tasmanian Independent Retailers, its related bodies corporate and its business pillars; and
- third parties who provide services to us;

The direct marketing may relate to:

- our products and services;
- the products and services of other parties;
- promotions run by us or other parties; or
- to keep you informed of new developments we believe may be of interest to you.

You may opt-out of receiving this direct marketing from Tasmanian Independent Retailers or third parties through the unsubscribe function that will be made available to you with each direct marketing communication.

How TIR Stores and Protects Personal Information

Tasmanian Independent Retailers stores personal information in a combination of computer storage facilities, paper-based files and other records. In so doing, we have taken numerous steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally, Tasmanian Independent Retailers takes reasonable steps to destroy or permanently de-identify personal information when we no longer need it.

The internet is not a secure method of transmitting information. Accordingly, other than where Tasmanian Independent Retailers uses secure socket layer technology (SSL) to ensure information (such as credit card information) is securely transmitted and processed, Tasmanian Independent Retailers cannot and does not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

Does TIR Send Personal Information Overseas?

Tasmanian Independent Retailers is likely to disclose some of your personal information, for the purposes described above, to organisations outside of Australia.

Personal information provided to organisations in the United States of America for example, may not have the same protection as set out in the Australian Privacy Principles, and Tasmanian Independent Retailers may not require such organisations to comply with the Australian Privacy Principles.

How You Can Access Your Personal Information?

Tasmanian Independent Retailers will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. If your personal details change, such as your address or phone number, please contact our Privacy Officer by email or at the address detailed below.

At your request, Tasmanian Independent Retailers will provide you with a copy of any personal information which we hold about you, unless an exception under the Privacy Act 1988 applies. We may charge a fee for retrieving this information, in which case we will inform you of the fee and obtain your agreement to that fee before providing the information.

We will promptly acknowledge and investigate any complaint about the way we manage personal information.

Cookies

The Tasmanian Independent Retailers websites use cookies to track user traffic patterns and to better serve you when you revisit a website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as a user ID which the website uses to track the pages you have visited. You can refuse all cookies by turning them off in your browser. However, full functionality for the Tasmanian Independent Retailers websites requires the use of cookies.

Information is also generated whenever a page is accessed on a Tasmanian Independent Retailers website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

How To Contact TIR or Make a Complaint?

If you have any questions about this Privacy Policy, if you wish to update information we hold about you or if you wish to make a complaint about our collection, use or disclosure of your personal information under this Privacy Policy, please contact:

Attention: The Privacy Officer (General Questions) or;

Attention: The Company Secretary (Complaints)

Tasmanian Independent Retailers
 Locked Bag 4
 LAUNCESTON TAS 7250
 Fax: (03) 63910 0299
 E-mail: privacy@tir.com.au

Tasmanian Independent Retailers will take reasonable steps to remedy any issues resulting from our failure to comply with our privacy obligations.

Declaration by:

GRANT HINCHCLIFFE
CEO

POLICY DEVELOPMENT USE

<i>Changes, Linked Documents, Authorisation, Effective & Evaluation Dates</i>	
Linked Documents	CG01-01 Privacy Governance Procedure
Policy Changes	This policy may be rescinded, changed or replaced at any time at the absolute discretion of the TIR Board, CEO or authorised delegate.
Authorisations	Chief Executive Officer TIR Board of Directors
Prior Relevant Documents	This policy supersedes any prior Privacy Policy, verbal or written.
Effective Date	V1: March 2014
Current Version	V3: 1 January 2019
Next Review Date	Prior to end of 2021

<i>Evaluation History</i>			
Date	Author	Sections Modified	Details of Amendments
March 2014	N Banfield	ALL - Drafted	Document creation, parameters set and implementation of drafts to the Board for review.
March 2014	TIR Board	ALL	Board Approval as of March 2014
June 2016	N Banfield	ALL – Review	Small modifications
December 2018	N Banfield	ALL	Updated format to new policy template, included TIR website and removed Director title