

## PRIVACY STATEMENT

### 1 Your rights in relation to privacy

Ozpak Pty Ltd ACN 091 370 446 (Ozpak) understands the importance of protecting the privacy of an individual's personal information. This statement sets out how Ozpak aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Ozpak and the way Ozpak collects, holds, uses and discloses your personal information.

In handling your personal information, Ozpak will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and with the 13 Australian Privacy Principles in the Privacy Act. This policy statement may be updated from time to time.

### 2 What kinds of personal information does Ozpak collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its products and services, Ozpak may collect your personal information.

Generally, the kinds of personal information Ozpak collects are:

- ◆ contact and identification information such as your name, telephone number, email address, postage address and date of birth;
- ◆ financial information related to your transactions with us;
- ◆ details of your relationship with any entity with which Ozpak has a commercial relationship (whether you are an employee, director or contractor of that entity or otherwise); and
- ◆ where you are applying for a position with Ozpak, information about you provided through the recruitment process, including, sensitive information such as health information and criminal record information, where it is relevant to the recruitment process through which you must progress (including Ozpak's assessment of whether you are able to perform the inherent requirements of the particular role).

In some circumstances Ozpak may also hold other personal information provided by you.

### 3 How does Ozpak collect personal information?

Generally, Ozpak collects your personal information directly from you, through the completion of a manual or online form, an interaction or exchange in person or by way of telephone, facsimile, email, post or through the use of the Ozpak website. There may be occasions when Ozpak collects your personal information from other sources such as from:

- ◆ your employer, where necessary for Ozpak to provide its products and/or services to your employer through you;
- ◆ an entity through which you are referred to Ozpak;
- ◆ an information services provider;
- ◆ a publicly maintained record or other publicly available sources of information including social media and similar websites;
- ◆ if for recruitment purposes, an external recruitment or background screening services provider, a current or former employer and/or referees you have named in an application for employment with Ozpak.

Generally, Ozpak will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

### 4 Why does Ozpak need your personal information?

Ozpak collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- ◆ providing wine bottling and packaging services, wine storage services, laboratory analysis and quality assurance services, wine distribution services, transport and logistic services, and bottling and packaging materials and products;
- ◆ accounting, billing and other internal administrative purposes;
- ◆ identifying and informing you of products and services that may be of interest to you from Ozpak or selected third parties;
- ◆ assessing your application for employment with Ozpak or otherwise for the purpose of engaging you as a contractor or consultant; and
- ◆ any other legal requirements applicable to Ozpak.

Ozpak may also use your personal information for purposes related to the above purposes and for which you would reasonably expect Ozpak to do so in the circumstances, or where you have consented or the use is otherwise in accordance with law.

Where personal information is used or disclosed, Ozpak takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Ozpak. However, without certain information from you, Ozpak may not be able to provide its products and/or services to you.

### 5 To whom does Ozpak disclose your personal information?

Ozpak discloses your personal information for the purpose(s) for which Ozpak collects it. That is, generally, Ozpak will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to:

- ◆ third parties engaged to perform administrative or other business management functions;
- ◆ people or entities considering acquiring an interest in Ozpak's enterprise or assets;
- ◆ Ozpak's professional advisors (including legal, financial and accountancy advisors), contractors, consultants and related bodies corporate;
- ◆ insurance providers; and
- ◆ any relevant regulatory bodies.

Ozpak's disclosures of your personal information to third parties are on a confidential basis or otherwise in accordance with law. Ozpak may also disclose your personal information with your consent or if disclosure is required or authorised by law.

## **6 Overseas disclosure**

Ozpak does not disclose personal information to overseas recipients.

## **7 Direct marketing**

Ozpak may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting Ozpak via the contact details set out in paragraph 10 or through any opt-out mechanism contained in a marketing communication to you.

Ozpak may also display on its website or other publication your personal information in connection with a testimonial you provide to us about your experience with Ozpak. Such testimonials will only be displayed with your express consent.

## **8 Security of your personal information**

Ozpak takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. Ozpak holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

Ozpak will destroy or de-identify personal information in circumstances where it is no longer required, unless Ozpak is otherwise required or authorised by law to retain the information.

## **9 Can you access and correct the personal information that Ozpak holds about you?**

Ozpak takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by Ozpak. If at any time you would like to access or correct the personal information that Ozpak holds about you, or you would like more information on Ozpak's approach to privacy, please contact Ozpak's Privacy Compliance Officer on the details set out in paragraph 10 below. Ozpak will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- ◆ you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- ◆ Ozpak requests that you be reasonably specific about the information you require; and
- ◆ Ozpak may charge you a reasonable administration fee, which reflects the cost to Ozpak, for providing access in accordance with your request.

If Ozpak refuses your request to access or correct your personal information, Ozpak will provide you with written reasons for the refusal and details of complaint mechanisms. Ozpak will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of Ozpak.

Ozpak will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

## **10 How to contact us**

For further information or enquiries regarding your personal information please contact Ozpak's Privacy Compliance Officer at PO Box 133 Nagambie VIC 3608, or by phone 03 5794 2890, or email [sarah\\_macpherson@ozpak.com.au](mailto:sarah_macpherson@ozpak.com.au)

## **11 Privacy complaints**

Please direct all privacy complaints to Ozpak's Privacy Compliance Officer. At all times, privacy complaints:

- ◆ will be treated seriously;
- ◆ will be dealt with promptly;
- ◆ will be dealt with in a confidential manner; and
- ◆ will not affect your existing obligations or affect the commercial arrangements between you and Ozpak.

Ozpak's Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.