



Privacy & Credit Reporting Policy

1 Privacy & Credit Reporting Policy

- (a) This is the privacy and credit reporting policy of Zerella Holdings Pty Ltd ACN 007 857 534 and our related entities ('Zerella', 'we' or 'us'). The purpose of this policy is to ensure that any individual who provides information to Zerella is protected under Australian law, in accordance with the *Privacy Act 1988* (Cth) ('Privacy Act').
- (b) Zerella will be considered a credit provider in relation to providing credit under the Privacy Act when it provides credit terms of more than 7 days to its customers who are sole traders (individuals) or in a partnership. Zerella will in such circumstances comply with the *Privacy (Credit Reporting) Code* in relation to the credit.
- (c) Words defined in the Privacy Act have the same meaning when used in this policy.

2 Protecting your privacy

We seek to protect and maintain the privacy, accuracy and security of your personal information. We will comply with the Australian Privacy Principles ('APPs') in the Privacy Act.

3 Collection of information

3.1 General

- (a) We may collect personal information about you such as:
 - (i) Your name, current address, previous address details;
 - (ii) Date of birth and gender;
 - (iii) Email addresses and telephone and or mobile numbers;
 - (iv) Current and previous employment information;
 - (v) Your driver's licence number; and
 - (vi) Your credit-related personal information (see clause 3.2 below).
- (b) We collect information when you use our website. Please refer to the website section of this policy for further details. We do not collect sensitive information about you such as your racial or ethnic origin, political opinions, religious beliefs or affiliations.
- (c) If there is another person named in any correspondence, you may need to provide their personal information and you warrant that the other person has consented to the collection of their personal information for the reasons it is being collected.

3.2 Credit-Related Personal Information

- (a) Zerella sometimes provides goods and services to customers on credit. In connection with this credit, Zerella does in some cases handle certain consumer credit related personal information described below (**'credit-related personal information'**), including information from credit reporting bodies (**'CRBs'**). For example, Zerella may handle this information in providing credit to sole traders, or where individuals such as directors provide personal guarantees for credit Zerella provides to their companies.
- (b) We may collect credit-related personal information about you such as:
 - (i) your name, sex, date of birth, driver's licence number, employer and three most recent addresses;
 - (ii) confirmation of previous information requests to CRBs made by other credit providers and credit insurers about you;
 - (iii) details of previous credit applications, including the amount and type of credit and credit limit;
 - (iv) details of current and previous credit arrangements, including credit providers, start/end dates and certain terms and conditions;
 - (v) permitted payment default information, including information about related payment arrangements and subsequent repayment;
 - (vi) information about serious credit infringements (e.g. fraud);
 - (vii) information about adverse court judgments and insolvency;
 - (viii) publicly available information about the individual's credit worthiness;
 - (ix) any credit score or credit risk assessment indicating a CRB's or credit provider's analysis of the individual's eligibility for consumer credit.

4 If you do not provide personal information

The main consequence for you, if some or all of the above personal information is not collected by us is that we may not be able to provide goods, services (including on credit) or information to you, or be able to provide them to the same standard as if we had the information requested.

5 How we collect personal information

5.1 General

We collect personal information in a variety of ways. We mainly collect information from you when you knowingly provide it to us via our website, when you contract with us, make a request or enquiry of us or when you join our mailing list.

5.2 Suppliers & Business Customers

- (a) We collect personal information from our suppliers and commercial customers when they provide it to us as part of an application to supply goods and/or services or when they request Zerella to provide goods and/or services.
- (b) We may also collect personal information about you from your representatives, including your spouse, business partner or professional adviser (where it is reasonable and practical to do so).
- (c) We may collect credit-related information from the “trade references” or bankers you list in our credit application, or such other credit providers named in a credit report issued by a credit reporting agency.
- (d) Zerella may obtain a credit report from a credit reporting agency about your personal credit worthiness and activities, or where it is relevant to collecting overdue payments, in respect of credit provided to you, information in relation to collecting overdue payments.

6 Why we collect, hold and use and disclose personal information

- (a) We collect, hold, use and disclose personal information about individuals when it is necessary for us to carry on our business functions or to comply with laws.
- (b) We may collect, hold, use and disclose your personal information to answer your enquiry or to provide the information or service that you requested.
- (c) We may also collect, hold, use or disclose your personal information:
 - (i) conduct checks for credit worthiness or fraud;
 - (ii) to enable us to develop, administer and manage our services and business;
 - (iii) to verify your identity;
 - (iv) to customise service to better meet your needs and preferences;
 - (v) for statistical purposes;
 - (vi) for future promotional and marketing purposes including direct marketing;
 - (vii) for research purposes to better improve our websites, products or services;
 - (viii) for other customer support purposes;
 - (ix) to deal with complaints, queries or feedback; and
 - (x) when authorised or required by law.

7 Direct Marketing

Zerella does not engage in direct marketing.

8 When we may disclose your personal information to third parties

8.1 General

In the course of conducting our business we may provide your personal information to:

- (a) credit providers and credit reporting agencies;
- (b) our related companies;
- (c) an individual's representatives;
- (d) government and regulatory authorities; and
- (e) our professional advisers, including our lawyers, auditors and accountants.

We may disclose your personal information to third parties:

- (a) to meet the purpose for which it was submitted;
- (b) if we have your consent to do so or otherwise when we are authorised by law;
- (c) if we are required by law to disclose the information.

Zerella may exchange personal information with contractors who manage services provided to an individual on Zerella's behalf, or who provide services to Zerella, including:

- (a) mailing services;
- (b) billing and debt recovery functions;
- (c) marketing functions;
- (d) website, data management and technology services.

8.2 Credit-Related Personal Information

Zerella may disclose credit-related personal information to CRBs to assist the CRBs to maintain information about individuals to provide to other credit providers for credit assessments.

Zerella may collect credit-related personal information from CRBs for purposes including, to the extent permitted by law, to assess relevant credit or guarantee applications, manage and review the credit or guarantee, assign debts, collect overdue payments and produce assessments and ratings in respect of the individual's credit worthiness. Zerella may also exchange credit-related personal information with guarantors, debt buyers and other credit providers.

Zerella may use Veda Advantage as a CRB.

9 Overseas recipients

Zerella will not disclose your personal information to overseas recipients.

10 Security

All personal information held by us will be handled and stored in accordance with our obligations under the Privacy Act. We will take reasonable steps to:

- (a) make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- (b) protect the information from misuse, interference, loss or unauthorised access, modification or disclosure both physically and through security methods; and
- (c) destroy or permanently de-identify the information if it is no longer needed for any purpose.

11 Website

- (a) When you visit our websites, we or agencies on our behalf and our internet service provider may monitor and take a record of your visit and log “clickstream data” for statistical purposes such as your server’s IP address.
- (b) This privacy policy is strictly limited to the collection, storage and use of personally identifiable information collected by Zerella, in the course of business, and does not apply to any third parties. We have no control over the privacy practices or the content of any third party websites, and assume no liability for the privacy practices of these websites.
- (c) Any Link on a Zerella website to external entities are not covered within this policy. The terms and conditions set out in this privacy statement only cover the domain names of www.zerellafresh.com.au and www.spudlite.com.au.

12 Privacy

- (a) At your request we will provide details of the personal information we hold about you. The release of information is subject to some exceptions such as information relating to existing or any anticipated legal proceeding, together with exceptions provided by the Privacy Act.
- (b) Unless unusual circumstances apply, we should provide access to you within 30 days of the request.
- (c) We reserve the right to charge a fee for providing access to your information to your information when permitted by law.

- (d) To protect your personal information, the request to us must be in writing and can be sent by letter or facsimile or email. All correspondence should be addressed to:

Mail: Attention: Marketing and Media Manager
Zerella Fresh
Johns Road,
Virginia SA 5120
Email: frontdesk@zerella.com.au

- (e) Our objective is to respond to any request within a reasonable timeframe.
- (f) We also aim to ensure that your personal information is accurate, up to date and complete. Amendment of personal information will be conducted upon written or verbal request from you. You can contact us by writing to the address above to do this.

13 Complaints

- (a) We are committed to the protection of your privacy and personal information. Complaints you may have about your personal information can be lodged with us by using the contact details above.
- (b) We will attempt to resolve any complaints within 10 working days. If resolution is not possible within this timeframe we will contact you to discuss the matter further.
- (c) You also have the right under the Privacy Act to make a complaint to the Information Commissioner.

14 Changes to this policy

This policy is subject to change over time without prior notice. We may amend this policy by updating this posting.

15 Copies of this policy

You can ask us to provide you with a copy of this policy, including a hard copy, by contacting us using the contact details above.

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