

Privacy Policy - Essantis

This is the Privacy Policy for Unigrain (trading as Essantis), ACN 120 061 841 and related companies. This Privacy Policy applies to each of those entities both in their personal capacity and their capacity as trustee of any trust operated by them from time to time (**we, us and our**).

This Privacy Policy describes our policies and practices for collection, use, disclosure, security, accuracy and correction of personal information.

We comply with the *Privacy Act 1988* (Cth) (**Privacy Act**), the applicable Australian Privacy Principles under that Act and any other applicable privacy laws when handling personal information. We take the protection of your personal information seriously.

This Privacy Policy is effective as at 27 November 2023. We will update the policy from time to time and any updated policy will be posted on our website www.essantis.com.au (**Website**).

1. Personal Information

In this Privacy Policy, personal information means any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.

2. Consent

- 2.1 By providing personal information to us, you consent to us collecting, holding, using and disclosing that personal information in accordance with and for the purposes specified in this Privacy Policy.
- 2.2 You are not required to provide personal information to us. You have the option of not identifying yourself or using a pseudonym. However, if you do not identify yourself or you do not provide us with all the information we request, we may not be able to provide you with our products or services.

3. Collection

- 3.1 The types of personal information we collect may include:
 - (a) your name, date of birth, address, phone number, email address and related contact information, including details of any entity through which you acquire our products and services;
 - (b) information and/or documentation to verify your identity for the purpose of laws regarding identification verification and tax reporting and withholding;
 - (c) your bank account information and tax file number;
 - (d) payment information, such as credit card details;
 - (e) information about goods or services ordered, acquired or supplied by us;
 - (f) information from inquiries made and records of our communications with you, including any complaints, requests or queries;
 - (g) information and application details (including on any resume submitted) you provide when applying for employment or completing employment forms with us; and
 - (h) any other personal information that you provide to us when you make an inquiry, request information or otherwise correspond with us.
- 3.2 It may be necessary for us to collect some forms of sensitive information about you in certain circumstances, where we are required or authorised to do so by legislation, regulation or

direction to do so. Sensitive information includes information about a person's health, disability, religious beliefs and criminal history.

- 3.3 In most instances we will collect your personal information from you directly when you communicate with us, including by the following methods:
- (a) from correspondence and other communications between you and our employees, representatives and officers by telephone, email or in person; and
 - (b) via our Website.
- 3.4 In some circumstances, we may collect personal information from third parties, including from:
- (a) your authorised representatives or executors;
 - (b) persons providing you with references, recruiters, previous employers; and
 - (c) other third parties whom you have authorised to provide your personal information.
- 3.5 We may also collect information using 'cookies' on our Website for the purposes of:
- (a) operating an efficient online service;
 - (b) tracking the patterns of behaviour of visitors to the Website; and
 - (c) providing a tailored experience to visitors to the Website, including advertisements.

Although you can usually modify your browser to prevent cookie use, if you do this, our Website may not work properly for you.

4. Purpose – collection, holding, use and disclosure

- 4.1 The purposes for which we primarily collect, hold, use and disclose personal information are:
- (a) to carry on our business, including in accordance with the terms of any service agreement;
 - (b) to meet our reporting obligations;
 - (c) to administer service agreements, joint venture agreements or other transactions entered into with us and for associated reporting purposes;
 - (d) to assess your application for employment and suitability for any role with us, including recruitment purposes;
 - (e) to communicate with you by various means, including to manage your feedback and complaints;
 - (f) the general management and conduct of our business;
 - (g) for governance and compliance purposes including where we are required to authorised to do so by legislation; and
 - (h) complying with our legal obligations.
- 4.2 We may also use personal information for related purposes that would be reasonably expected by you.
- 4.3 We will not use or disclose your personal information for any purpose other than the purpose for which it was collected (or a related purpose) unless you have consented to that other purpose or we are permitted to do so by law.
- 4.4 In some circumstances we may disclose your personal information to third parties including to comply with our legal obligations. The organisations to whom we typically disclose this information include:

- (a) organisations contracted to provide services to us, including:
 - (i) suppliers of services required to verify your identity or validate your accounts;
 - (ii) organisations who may operate and manage the Website;
 - (iii) printers and mailing houses;
 - (iv) IT service providers;
- (b) our auditors, insurers, consultants and other professional advisors (such as lawyers and accountants);
- (c) government agencies and bodies such as the Australian Transaction Reports and Analysis Centre, the Australian Securities and Investments Commission and the Australian Taxation Office;
- (d) other third parties who you have authorised to receive your personal information.

4.5 In all cases, unless you have opted out, you consent to us:

- (a) using your personal information for direct marketing purposes in order to tell you about services and offers that we think may be of interest to you; and
- (b) disclosing your personal information to third parties for direct marketing purposes in order for these third parties to tell you about services and offers that they think may be of interest to you.

4.6 We (or third parties) may contact you by mail, telephone, email or SMS to market our (or their) services. We will always give you the opportunity to opt out of receiving any future direct marketing correspondence or disclosure of your information to third parties. For example, you may choose to 'unsubscribe' from receiving future electronic communications from us at any time.

4.7 We will take reasonable steps to satisfy ourselves that any third party to whom we disclose your personal information has a commitment to protecting your personal information.

4.8 We will not disclose your personal information to overseas recipients.

5. Integrity of personal information

5.1 We will take steps which are reasonable in the circumstances (if any) to ensure that the personal information we collect, use and disclose is accurate, up-to-date, complete and relevant (having regard to the purpose of the use or disclosure). To assist us, please ensure that the information you provide to us is accurate, up-to-date and complete.

5.2 If we hold personal information that is no longer needed for any purpose for which it may be used or disclosed, we will take steps which are reasonable in the circumstances to destroy or permanently de-identify that personal information.

6. Storage and security of personal information

6.1 We take reasonable steps to keep personal information secure and to protect it from unauthorised access, modification and disclosure and from misuse, interference and loss. Any personal information that is collected electronically is protected by technical and procedural safeguards.

6.2 Personal information is stored securely and is only disclosed or used for the purposes described in this Privacy Policy.

6.3 While we take reasonable steps to secure your personal information in accordance with our legal requirements, we cannot guarantee that information supplied by you via the internet will not be intercepted, nor guarantee the security of information transmitted online.

6.4 The Notifiable Data Breaches Scheme, established under the Privacy Act sets out obligations for notifying affected individuals and the Australian Information Commissioner about a data breach which is likely to cause serious harm. We will act in accordance with our obligations under the Scheme, including by notifying an affected individual and the Commissioner where serious harm caused by a data breach is likely.

7. Access to and correction of personal information

7.1 You can request, and we will provide you with access to, any personal information we hold about you (subject to certain legal exceptions). If a legal exception applies and we decide not to provide you with access to that personal information, we will advise you of the reasons for our decision.

7.2 You will not be charged for making a request for your personal information.

7.3 If we are satisfied that any personal information we hold about you is inaccurate, incomplete, out of date, misleading or irrelevant (having regard to the purpose for which it is held) we will take steps which are reasonable in the circumstances (if any) to correct that personal information. This may include notifying third parties to whom we have disclosed that personal information. If we do not agree that personal information we hold about you is inaccurate, incomplete, out of date, misleading or not relevant you may ask that we attach a statement to this effect to our record.

7.4 Please let us know if you have any concerns or complaints about the way we are handling personal information so we can address them. We will review any complaints and respond to them within a reasonable period of time.

7.5 If we are unable to satisfactorily resolve your concern or complaint, you can contact the Office of the Australian Information Commissioner (**OAIC**). To make a query concerning your privacy rights, or to lodge a complaint with the OAIC about how we have handled personal information, you can contact the OAIC on 1300 363 992 or go to www.oaic.gov.au. The OAIC have the power to investigate the matter and also to take certain other action.

8. Other organisations' websites

The Website and our email communications may contain links to other websites. We do not control these websites or any of their content and if you visit these websites, they will be governed by their own terms of use (including privacy policies).

9. Changes to this Privacy Policy

We may amend this Privacy Policy, in whole or part, in our sole discretion. Any changes to this Privacy Policy will be effective immediately on the posting of the revised Privacy Policy on the Website. Depending on the nature of the change, we may announce the change on the home page of the Website or by email (if we have your email address). However, in any event, by continuing to access our services following any changes, you will be deemed to have agreed to the changes. If you do not agree with the terms of this Privacy Policy, as amended, in whole or part, you must not access our services including the Website.

10. Contact us

If you have any questions about this Privacy Policy or if you wish to request access to your personal information, correct or update your details or raise any privacy concerns you may have, please contact us via email at essantis@essantis.com.au, or write to us as at PO Box 303, Geelong, Victoria, 3220

Effective date: 27th November 2023