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<b>Page</b>	1 of 5	<b>Next Review</b>	August 2013

## Purpose

This Privacy Policy is intended to provide a general overview of Viterra's policies in respect of the handling of your personal information. Your "personal information" is any information or opinion about you that is capable of identifying you.

## Scope

This Policy is intended to cover most personal information handled by Viterra, but is not exhaustive. If you have any queries about our management of your personal information, you are encouraged to contact Viterra for further information.

## Responsibility

Employees of Australia/New Zealand Viterra.

## Policy

### 1. Privacy Act

In Australia, Viterra Ltd (ABN 59 084 962 130) is an "organisation" for the purposes of the Privacy Act 1988 (**Act**), and is subject to the National Privacy Principles contained in the Act.

In New Zealand, Viterra (NZ) Ltd (ABN 59 084 962 130) is an "agency" for the purposes of the Privacy Act 1993, and is subject to the Information Privacy Principles contained in this Act.

A reference to "we" "our" or "us" in this Privacy Policy is a reference to Viterra Ltd and Viterra (NZ) Ltd where appropriate.

This Privacy Policy is intended to provide a general overview of our policies in respect of the handling of your personal information. Your "personal information" is any information or opinion about you that is capable of identifying you.

Other policies may override this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that stated purpose.

## 2. Exemptions

No general exemptions under the Act apply to us, or to any of our acts or practices.

## 3. How We Collect, Hold, Use and Disclose Personal Information

### 3.1 Collection

We will collect your personal information directly from you whenever possible, and will limit the personal information we collect to that which is necessary for our functions or activities. When collecting personal information (or as soon as reasonably practicable afterwards), we will endeavour to make you aware of the purposes for which the information is being collected by us, the organisations to which we would usually disclose your information, and any consequences for you if you fail to provide any information that is requested by us.

### 3.2 Storage

We store your personal information securely, and have policies and procedures intended to ensure that your personal information is not misplaced or misused, and that unauthorised access to, or modification or disclosure of, your personal information does not occur.

Security measures we employ include password protection for electronic documents, secure waste bins for physical document security and regular monitoring and improvement of our practices and systems to ensure the effectiveness our security policies.

We will endeavour to destroy your personal information as soon as it is no longer required by us (and this is permitted by law).

### 3.3 Use and Disclosure

We will generally only use or disclose your personal information for the purpose for which we collected it, and for related purposes we consider will be within your reasonable expectations. Otherwise, we will seek your consent prior to using or disclosing your personal information for another purpose, unless we are required or permitted by law to do so without seeking your permission.

Further information about our use and disclosure of personal information is set out below.

## 4. Access to Personal Information

You may contact us to request access to the personal information about you that we hold. We may refuse to allow you to access your personal information if we are legally required or entitled to do so.

We may require you to pay a fee in order to access your personal information held by us. We will advise the amount of the fee payable (if any) once we have assessed your application for access. Any request for access to personal information will not incur a fee.

If you lodge a request for access, we may provide you with access to your personal information in any of a number of ways (including, for example, supplying you with a copy of your personal information, or providing you with the opportunity to view your personal information).

If you establish that any personal information we hold about you is not accurate, complete and up-to-date, we will amend our records accordingly.

Please notify us if your personal details change so that we may keep our records up-to-date.

## 5. Kinds of Personal Information We Hold

The personal information about you we hold may include your name and address, contact telephone number(s) and/or email address(es), and details about your cropping area and crop type. We may also hold any other personal information that you provide to us.

We do not hold any sensitive information about you unless you provide it to us.

We hold this information so that we may, amongst other activities that may apply in specific circumstances:

- establish and maintain a responsible commercial relationship with you;
- provide products and services to you or carry out the intent of any contract entered into between you and us;
- understand your needs and preferences and/or determine your eligibility for products, services, loyalty programs, rebates and/or promotions;
- recommend particular products and services offered by us or our strategic business partners, to meet your needs;
- develop, enhance, market or provide our products and services;
- manage and develop our business and operations;
- meet legal and regulatory requirements; and/or
- Work with Government and non-Government departments to assist with research and the discharge of legislative functions.

## 6. Disclosure of Personal Information to Other Organisations

We may disclose your personal information to:

- certain contractors or subcontractors of ours that provide administrative or promotional services to us (for example, mail processing businesses, printers, or market research companies). We seek to enter into contractual agreements with these organisations to ensure that information we disclose is used only for the limited purposes for which we have provided it;
- our parent company, Viterra Incorporated, which is based in Canada. Any information provided to Viterra Incorporated will be handled in accordance with the Viterra Incorporated Privacy Policy, which can be viewed at

<http://www.viterra.com/portal/wps/portal/global/footer/privacy>

## 7. Online Privacy

This part of our Privacy Policy sets out the manner in which we handle your personal information in respect of online services provided to you by us. “Online services” includes any services provided by us via the Internet (including email and web pages).

### 7.1. Automatic Server Logs

Our web site server automatically collects various items of information when you use our web site, including:

- your IP (“Internet Protocol”) address (which, in general terms, is a unique identifier assigned to your computer when it is connected to the Internet);
- the operating system and Internet browser software you are using; and
- the data that you download (such as web pages or other files), and the time that you download it.

Although, in some circumstances, it may be possible to identify you from this information, we do not attempt to do so, and only use this information for statistical analysis, system administration, and similar related purposes. This information is not disclosed to any other party.

### 7.2. Cookies

Our web site uses cookies. A cookie is a piece of information stored on an individual’s computer and used for customising site information to improve user experience and track user navigation. Should you be concerned about cookies, you can set your browser to refuse cookies (although this may adversely impact the functionality of the services we are able to provide to you) or to alert you to the fact that cookies are being used.

### 7.3. Email and Message Forms

We may collect personal information from you (such as your name, address, telephone number and email address, and any other personal information you volunteer) if you send us email or if you submit information to us using a message or feedback form. We will use this personal information to contact you to respond to your message, to send you information that you request, and for other related purposes we consider are within your reasonable expectations. We will not use or disclose any such information for any other purpose without your consent.

### 7.4. Storage and Transmission of Personal Information Online

If you provide any personal information to us via our online services (including email) or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have indicated to you beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

If we receive your personal information, we will take reasonable steps to store it such that unauthorised access, modification, disclosure, misuse and loss are prevented.

## 7.5. Other Online Services

If any of our online services (including any email messages we send to you) contain links to other online services that are not maintained by us (**other services**), or if other services link to our online services, we are not responsible for the privacy practices of the organisations that operate those other services, and by providing such links we do not endorse or approve the other services. This Privacy Policy applies only in respect of our online services.

## 8. National Grower Register

We may obtain certain information about you from the National Grower Register (**NGR**), a centralised database of contract and payment information for grain producers and traders, which is operated by National Grower Register Pty Ltd.

If we collect information in this manner, we will treat that information in accordance with the NGR Privacy Statement, a copy of which is available at [www.viterra.com.au](http://www.viterra.com.au). As a user of the NGR, Viterra is required to comply with the NGR Privacy Statement.

## 9. Changes

We reserve the right to amend this Privacy Policy at any time. You may obtain a copy of the current version of the Privacy Policy by contacting us.

## 10. Complaints

If you believe that a breach of your privacy has occurred, we encourage you to contact us to discuss your concerns.

## 11. Further Information

You may contact us if you require further information about the ways we manage your personal information.

### Contact Information

The Privacy Officer  
[privacy@viterra.com](mailto:privacy@viterra.com)  
124-130 South Tce Adelaide SA 5000

29 August 2011

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