



Privacy Policy - ANZ

Version: 1.0 □ Reviewed: September 2024

Purpose

This privacy policy (**Policy**) governs the collection, use and disclosure of personal information by Hellers Limited, Hellers Australia Pty Limited and the related companies listed at the end of this Policy (collectively referred to as **Hellers, we, us, and our**).

In this Policy 'personal information' means information about an identifiable individual (a natural person). This Policy outlines how we manage personal information including in accordance with all applicable privacy and data regulation laws, including the New Zealand *Privacy Act 2020* and Health Information Privacy Code 2020 and the Australian *Privacy Act 1988 (Cth)* and Australian Privacy Principles (together, **Privacy Laws**).

Application of this Policy

This Policy applies if you:

- are one of our customers, clients, contractors or suppliers;
- use any of our products and services;
- visit our website at hellers.co.nz, hellers.com.au, moiramacs.com.au, canonfoods.com.au or any of our affiliated websites (**Sites**) or any of our social media channels (**Channels**); or
- are employed by us or seeking employment with us
- (referred to as **you** and **your**).

By using our products, services and/or otherwise providing us with your personal information, you consent to that personal information being collected, held, used and disclosed in accordance with this Policy.

This Policy is in addition to any other applicable terms and conditions that may apply to your relationship and/or engagement with us.

Collection – How we collect information about you

Who we collect information about

We may collect and hold personal information about:

- current, potential and former customers, clients, contractors and/or suppliers;
- service providers, suppliers and their employees and contractors;
- current and prospective employees and contractors of Hellers, and their next-of-kin or emergency contacts;
- individuals we deal with in the course of carrying on our business; and
- other people who come into contact with Hellers.

Information we collect

We collect personal information in order to manage and conduct our business, to provide and market our products and services and to meet our legal obligations. Depending upon the nature of your relationship with us, the type of personal information we collect and hold may include:

General: information as required for our relationship with you, such as:

- your name, address, contact details, date of birth, and documents that verify your identity and other personal details;
- your tax file number / IRD number, tax status and citizenship or residency details;

- your drivers' licence, passport and/or visa details;
- your payment information, such as your bank account details or payment history;
- credit information;
- details of the products and services we have provided to you, or that you've enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- details of the products and services you have provided to us;
- records of our communications with you, including any complaints, requests or queries;
- information that you post to our Sites or Channels;
- when you access our products or services, or our Sites or Channels we may collect information that is sent to us by your computer, mobile device or other access device, including – your device ID, device type, IP address, geo-location, computer and connection information, referral URL, statistics on page views, traffic to and from our products, services and Sites;
- CCTV footage from any of our premises;
- any other personal information that may be required in order to facilitate your dealings with us and/or to assist us in conducting our business, providing and marketing our services and meeting our legal obligations;
- information we create in the course of our relationship with you, such as details or evaluations of your interactions with us.

For current or prospective employees, contractors, suppliers and/or visitors to our premises/sites: information for the purpose of commencing and conducting a business or employment relationship with you. This may include:

- information about your occupation, employment history, education and suitability for the role or relationship, including criminal history, social media profiles and whether you hold any licences/permits required for the role;
- name and details of emergency contacts;
- your car registration information;
- your health and medical information, including medical history, condition and treatment plan, and contact details for your medical practitioners and treatment providers;
- diversity information, which might include gender, ethnicity, languages spoken, relationship status etc; and
- information about your performance in the role or relationship, including results of drug testing (if applicable).

For health and safety purposes : information for the purpose of health and safety compliance and/or complying with guidelines set down by the Government, Ministry of Health and/or District Health Boards and to enable Hellers to make informed health and safety decisions. This may include:

- biometric information including temperature checks;
- recent personal health history including details regarding communicable diseases; recent overseas travel, contact with any person(s) who have travelled overseas in the preceding 14 days, have tested positive for COVID-19 or are awaiting test results, or are experiencing any COVID-19 symptoms.

Who we collect personal information from

We use different methods to collect your personal information. We will generally collect personal information directly from you (e.g. in person, by telephone or through written information or forms that you submit to us). However, we may also collect personal information:

- from you indirectly (including through the use of services and facilities available through our Sites and Channels);

- from current, potential and former service providers, suppliers and their employees and contractors, investors, employees, individuals we deal with in the course of carrying out our business and other people who come into contact with Hellers;
- from third parties in some instances, for example, we may use third parties to analyse traffic at our Sites and Channels, which may involve the use of cookies. In some circumstances we might collect personal information about an individual from a third party, for example, a report provided by a medical professional or an employment reference from another person. Other third parties may include your health service providers, health insurers, government agencies, private and public hospitals, service providers we engage to manage our investors, recruitment and labour hire companies, and suppliers of services to us, or third parties where we have your consent to that collection;
- from CCTV cameras that may be placed on our premises, which includes any of our retail outlets; and
- from publicly available websites or sources.

If you have provided us with information about another person, you warrant that you have that person's permission to do so. Your obligations under Privacy Laws may also mean that you need to tell that person about the disclosure and let them know that they have a right to access their personal information and that we will handle their personal information in accordance with this Policy.

What happens if you don't provide us with personal information

You are not required to provide us with your personal information. However, in some cases, if personal information we request is not provided, it may affect our ability to do business with you, including that:

- we may be unable to supply the relevant product or service or to perform our obligations to you;
- we may not be able to offer you credit; and
- if you are an applicant for employment, we may not be able to process your application for a position at Hellers.

How we use personal information

In general, we collect, hold, use and disclose your personal information for the following purposes:

- to verify your identity;
- to provide and market our products and services to you;
- to help us operate, protect, manage, improve, conduct and develop our business (including our products and services), and our users' experience, for example, by performing analytics and conducting research;
- to communicate with you;
- subject to your consent, to keep you informed about our products and services and tell you about our promotions;
- to maintain and administer your records, including (where relevant) your employee records;
- to process, administer, collect payments from or make payments to you, and if applicable, make appropriate taxation deductions;
- to assess suitability of potential employees or contractors;
- to manage and meet obligations in relation to our employees and contractors;
- to ensure health and safety on our premises;
- to engage third parties on your behalf (where authorised);
- to purchase goods or services;
- to respond to any feedback, queries or complaints;
- to conduct appropriate checks for credit-worthiness;

- to provide joint marketing initiatives with other service providers;
- to perform data analysis and/or market research;
- to perform drug and alcohol searching and testing in accordance with our applicable policies;
- to identify, prevent or investigate any actual or suspected fraud, unlawful activity or threats to our systems or any person;
- to comply with our legal obligations, including our reporting obligations; and
- as otherwise may be required for the general management and conduct of our business.

In addition, CCTV footage specifically may be used for the following purposes:

- detecting and deterring unauthorised access to, and criminal behaviour on, our premises;
- monitoring the safety and security of our employees, contractors, suppliers and visitors, and completing incident investigations; and
- reviewing the actions of our employees and contractors.

Credit information

We sometimes provide products and services to our customers on credit. In the course of providing credit, we will sometimes collect certain credit information from individuals, for instance, where the credit application relates to a sole trader, company director or guarantor. Such credit information may include:

- identity and contact details;
- details of other credit arrangements including the relevant dates and applicable terms and conditions;
- details of previous credit applications including the amount and type of credit and credit limit; and
- details of any credit defaults, adverse court judgments or insolvency.
- information obtained from credit reporters, including credit scores and summaries.

By providing us with your credit information, you consent to us using and disclosing your credit information for the following purposes:

- to assess relevant credit or guarantee applications;
- to monitor and produce assessments in relation to your credit worthiness;
- to review and manage your credit account; and
- to any solicitors and mercantile agents for enforcement and recovery purposes.

Please see other sections of this Policy below, for further information regarding access, correction, complaints and how we generally handle personal information.

Who we may disclose personal information to

We may disclose your personal information:

- for the purpose for which it was collected (or a purpose that is directly related to the purpose in connection with which the information was obtained);
- for any other purpose for which you have authorised;
- where we are permitted or required to do so by law; and
- to our related companies in connection with the purposes set out in this Policy.

Some of the recipients we may disclose your personal information to include our related companies and third party service providers who help us to deliver our products and services to you and to conduct our business. These third parties provide a variety of services, including client contact, customer support, archiving, auditing, professional advisory, banking, data processing and storage, marketing and advertising, promotions and discounts, recruitment, data analysis, business intelligence, website and

technology services. Each of these third parties are carefully selected, and are only permitted to use your personal information to the extent necessary for them to provide their services to us.

Offshore disclosure

As at the date of this Policy, we are only likely to disclose personal information to our related companies and third parties located in Australia and New Zealand.

We will take reasonable measures to ensure that any cross-border disclosure is in compliance with the requirements of the relevant Privacy Laws. For example, by taking such steps as are reasonable in the circumstances to ensure that those organisations are either subject to comply with applicable privacy laws that, overall, provide comparable safeguards to those under the relevant Privacy Laws, or are otherwise required to protect the information in a way that, overall, provides comparable safeguards to those under the relevant Privacy Laws.

Security of your personal information

We take reasonable steps to protect personal information held by us from misuse and loss and from unauthorised access, modification or disclosure, for example through the use of technical and physical security measures, including restricting access to electronic records through technical access restrictions.

Access, correction and retention of your personal information

Access

You are entitled to access the personal information we hold about you, and may do so by contacting our Privacy Officer. In processing your request, we will comply with our obligations under the Privacy Laws, noting that we may need to verify your identity before we allow you to access your personal information, and are permitted to withhold the disclosure of personal information in prescribed circumstances.

Correction

If you believe the personal information we hold about you is inaccurate, incomplete or out of date, please contact our Privacy Officer. If you satisfy us that any personal information we hold about you is not accurate, complete or up-to-date, we will amend our records accordingly. If you are located in New Zealand, if we do not make any corrections you request, you may provide us with a statement of the correction sought and request that it be attached to the information you have asked to be corrected so that the statement is read with the information.

Retention

We will retain your personal information for as long as we require it to fulfil the purpose for which it was collected, unless a longer retention period is required for the purpose of discharging our legal, accounting and reporting requirements.

Where we no longer require your personal information, we will use reasonable endeavours to comply with our legal obligations in respect of that information (e.g. by de-identifying or destroying such personal information).

Marketing and opting out

If you consent to receiving direct marketing communications from us, we may use your personal information to contact you from time to time by whether by email, phone or SMS, to identify a product or service that you may be interested in or to tell you about new products or services, special offers, promotions and events.

If you do not want us to contact you for these purposes, you can withdraw your consent and let us know at any time by unsubscribing from the mailing list by clicking on the link in the marketing communication or contacting the Privacy Officer (at the contact details below).

Cookies and links to other sites

To improve our Sites and advertising, and to help us better understand browsing behaviour, when you use our Sites we may use website measurement software and other analytics tools and services (including Google Analytics) to gather information such as traffic patterns, mouse click activity, IP addresses, and any

other information you may provide through use of our Sites. We may also use analytics tools available on our Channels. This information is aggregated and anonymised so that you cannot be identified.

Like many other websites on the internet, Hellers may use 'cookies' to store and track information about you when you are on our Site or Channels. A cookie is a data file that is sent to your browser from a web server and stored on your computer (or other device), then sent back to the server by your browser each time you access certain sections of our Site or Channels.

This information helps us to remember your preferences and can help us to provide a tailored experience and customised content and material on our Sites and Channels. This information may be retained in an anonymous or aggregated form after we have erased personal information that identifies you from our systems.

You can choose to disable cookies via your device's website browser settings. However, if you choose to reject cookies, you may not be able to use or access some features of the services that we offer.

Hellers may have links or references to other websites from our Sites or Channels. This Policy does not apply to those websites and we take no responsibility for any information collected by such third parties.

Changes to this Policy

We may amend and update this Policy from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The most current version of this Policy is located at www.hellers.co.nz and www.hellers.com.au and can also be obtained by contacting our Privacy Officer via the details below.

We will provide you with reasonable notice before we implement any change by posting a statement on our website, or we may also announce it by email (if we have your email address). The date of this Policy will otherwise inform you as to whether there have been updates since your last visit.

By continuing to use our product, services or Site, or otherwise continuing to deal with us, you accept these changes and this Policy as it applies from time to time. However, if you do not agree to an amendment, you should notify our Privacy Officer at the contact details set out below.

How to contact us and complaints

If you have any questions about personal information or are unhappy with how we've handled your personal information, please contact our Privacy Officer using the following contact details:

By post: HELLERS LIMITED
67 Main North Road
Kaiapoi 7644
Christchurch
New Zealand
Attention, Privacy Officer

By email: privacy@hellers.co.nz

We will investigate any complaint and respond to you as quickly as possible (usually within 20 working days of hearing from you). For further information about making a privacy complaint, or the progress or outcome of any investigation, please contact the Privacy Officer using the details below.

If you're not satisfied with how we've handled your complaint, you can contact (as applicable):

- the Office of the Privacy Commissioner at: PO Box 10-094, The Terrace, Wellington 6143, phone 0800 803 909, <http://privacy.org.nz/>; or
- the Office of the Australian Information Commissioner at: GPO Box 5218, Sydney NSW 2001 or by email to enquiries@oaic.gov.au.

Hellers Group Companies

- Hellers Limited
- Hellers Australia Pty Limited

- HLRS BidCo Pty Limited
- HLRS HoldCo Pty Limited
- HLRS BidCo Limited
- HRLS HoldCo Limited
- Hellers Group Holdings Limited