Australian Agricultural Company Limited

Privacy Policy

Effective Date	*Approved By*
18/11/2026	Board of Australian Agricultural Company Limited

1 About Us and this Privacy Policy

1.1 Australian Agricultural Company Limited ACN 010 892 270, of Level 1, Tower A, Gasworks Plaza, 76 Skyring Terrace, Newstead Queensland 4006, and its subsidiaries including those trading as Westholme, Darling Downs and 1824 (**AACo**), recognise the importance of protecting the rights of individuals in relation to their personal and private information. Other than as stated below, this Privacy Policy (**Policy**) relates to Personal Data obtained by AACo as a Data Controller, which includes Personal Data relating to our customers, business contacts, website visitors and others.

1.2 This Policy excludes personal data about our employees and other personnel and personal data obtained when a person is applying for employment, which is managed separately in our *Workforce and Applicant Personal Data Privacy Policy*.

2 Definitions

AACo, we, our, or **us**	means Australian Agricultural Company Limited ACN 010 892 270 and its subsidiaries.
Data Controller	means an organisation (in this case, AACo) that determines the ways in which your Personal Data is processed and why.
Data Processor	means an organisation that processes Personal Data on behalf of a Data Controller.
Personal Data	means any information that personally identifies you (or others) or can be used to personally identify you (or others) and is described in section 3.
Privacy Laws	means all privacy and data protection laws that apply to us when we handle your information, including applicable health information laws, the United Kingdom General Data Protection Regulation (the **UK GDPR**); the UK Data Protection Act, the Privacy and Electronic Communications Regulations (**PECR**); the Australian Privacy Act 1988 (Cth) (the **Privacy Act**) and the Australian Privacy Principles contained therein; and the Spam Act 2003 (Cth).
Privacy Officer	means AACo's Privacy Officer (who is also our representative under the UK GDPR) who is described in section 16.
Process or processing	means any operation performed on Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, and any other handling of Personal Data.
Sensitive Information	means Personal Data considered sensitive under applicable Privacy Laws including information about a person's racial or ethnic origin, political opinions, memberships of a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a professional association or trade association, membership of a trade union, sexual orientation or practices, criminal record, health or medical information, genetic information biometric information where used for identification purposes and biometric templates . The inclusion of a category of information in this definition does not mean that AACo collects that information in all circumstances.

3 What data does AACo collect?

3.1 We collect, hold and process various categories of data, including Personal Data about our customers, business contacts and people who visit our website. AACo will only collect Personal Data in a fair and lawful manner.

3.2 If you are a customer or potential customer, or otherwise deal with us (including through our website), we collect, hold and process your Personal Data to provide you with our products and services and otherwise facilitate your dealings with us. For example, we use your information to process payments, provide after-sale services, respond to enquiries, resolve complaints, and conduct promotional activities.

3.3 The kinds of Personal Data we collect or otherwise process will depend upon the circumstances in which the Data is collected. Set out below are the main categories of Personal Data we collect, hold and process when you engage with us.

Category	Details
Account registration information	If you register an account with us, we will ask you to provide us with certain information, including your name, contact details, address, country and postcode, date of birth, and industry role. We may also ask for this information when you attend our events or interact with our sales team.
Using our websites or social media sites	We may collect website usage information through cookies, web beacons and other technologies, such as the IP address you are using, the name of your internet service provider, your browser version, the web site that referred you to us and the next website you go to, the pages you request and the date and time of those requests. We may also collect information that you provide to us via our website. For example, when completing an online contact form, we will ask for your name, email address, country location, industry role and enquiry type, in addition to your comments. If you apply for employment with AACo using our website, your Personal Data will be managed in accordance with our *Workforce and Applicant Personal Data Privacy Policy*.
Market and product development research information	If you participate in our market research or product development research (including focus groups, panels and surveys), we may collect information from you including: your name and contact details, date of birth, industry role, demographic information, and your opinions about our products or services, or potential products or services.
Information from third-party sources	We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

Category	Details
Visitor information	If you visit an AACo site, we may collect your name, contact details (including your phone number), the organisation you represent, details of your visit, emergency contact details, vehicle details, site induction records and acknowledgements, and other information reasonably required to manage your access to and safety at the site. We may also collect Personal Data about you through surveillance technologies deployed at our premises. This includes CCTV footage, thermal and automatic number plate recognition (ANPR) camera imagery captured by on-site camera systems at AACo properties.

3.4 We do not typically collect or otherwise process Sensitive Information relating to individuals however, we may do so in limited circumstances where required or permitted under law. We will provide further notice to you and/or seek your consent when we collect or process Sensitive Information.

3.5 If you wish to do so, you may choose to remain anonymous or use a pseudonym when dealing with AACo, unless it is not practicable for us to deal with you on that basis.

4 When and how do we collect your personal data?

4.1 Personal Data may be collected by us in certain circumstances, including when you:

a) engage with us to purchase our products;

b) visit any of our websites;

c) subscribe to our marketing communications on various AACo products or communicate with us via our website or our other social media sites;

d) interact or follow our social media pages/profiles like Twitter, Facebook and Instagram (including through the use of Meta Pixel);

e) otherwise contact us in respect of us providing you with a product or other information (including, for example a request for a copy of our Privacy Policy);

f) participate in any of our research projects;

g) when we partner with you, or your organisation;

h) visit an AACo site, complete a site induction or provide information required to obtain or manage access to the site, including where surveillance cameras (including CCTV, thermal imaging and ANPR cameras) are in operation;

i) authorise someone else to act on your behalf and they provide us with your Personal Data;

j) submit feedback; or

k) submit any query to the Privacy Officer.

4.2 We may also collect Personal Data about you in the event of a merger, alliance or joint venture with, or acquisition of, another organisation; or from third-party sources made publicly or commercially available.

4.3 Data you provide when you subscribe to our marketing communications will be captured within AACo's CRM database.

5 How will we use your Personal Data?

5.1 We use the Personal Data we collect for the purposes for which it was provided to us, other related purposes, as permitted by law and as required by law. The key purposes for which we use your Personal Data include the following:

a) providing or promoting our products and services to you;

b) contacting you to obtain your feedback, to find out your level of satisfaction with our products and services and for other market research activities;

c) determining the number of visitors to our websites and conducting reviews of our websites;

d) personalising user experience on our websites;

e) customer segmenting and profiling;

f) conducting contests and promotions;

g) managing loyalty programs;

h) managing event and webinar registration;

i) partner marketing opportunities;

j) keeping you informed about any changes to our websites as well as goods and/or services;

k) conducting product and market research (including focus groups, panels and surveys) so that we can better understand the needs of our customers and tailor our future products and services accordingly;

l) responding to any complaints, enquiries and feedback;

m) unsubscribing your details from our database;

n) managing access to and attendance at our sites, administering site inductions, communicating site requirements and contacting you or your emergency contact in connection with an emergency, safety incident or other site-related matter;

o) security and asset protection at our sites, including preventing and investigating unauthorised entry, theft and equipment tampering;

p) incident investigation and response at our sites;

q) preventing fraud, comply with any legal obligation or as otherwise required by law, and

r) any other purposes identified at the time of collecting your Personal Data.

5.2 If our information practices change at any time in the future, only Personal Data collected from the time of the policy change going forward will adhere to our updated practices.

6 How do we use your data for marketing?

6.1 AACo does not provide your Personal Data to other entities or organisations for the purposes of direct marketing. We may issue direct marketing communications if you have consented to receiving it or where Privacy Laws otherwise permit us to do so.

6.2 At any time you may opt-out of receiving our marketing communications by using any "unsubscribe" facility provided in the marketing communications you receive or by contacting the Privacy Officer with details of the communication and your wish to "opt-out". We will then take steps to remove your Personal Data from the direct marketing database from which your Personal Data was sourced.

7 Automated decision-making and profiling

This section describes how AACo uses automated decision-making and profiling in relation to your Personal Data.

7.1 Profiling activities (UK GDPR)

Under the UK GDPR, AACo uses Personal Data to automate decisions through profiling in the following ways:

Personalised communication: When Personal Data is collected through our website, we will use this information to profile a person based on their role, location and business type to determine the communications that person will receive.

Personalised marketing: We may use Personal Data to market messages based on a person's behaviour and preferences, which may include: sending personalised emails, showing personalised product recommendations, delivering personalised advertising, and targeting and communicating with individuals on third party platforms.

Testing and optimisation: We may use profiling to run effective A/B tests to ensure that we are assessing variations on the right groups of people.

Customer journey mapping: We may use profiling to serve communications based on a person's attributes.

7.2 How we use automated tools in our decisions (Australian Privacy Act):

- We use computer-based tools to help our personnel make some decisions about prospective customers and suppliers.
- We use these tools when assessing whether to onboard a customer or supplier and on what credit or trading terms.
- Our personnel review the outputs of these tools and make the final decision.

7.3 The kinds of personal information our tools use:

Customer and supplier onboarding: your name, contact and address details; business details; credit information and credit history obtained from third-party credit and business information services; publicly available information about you; and information you provide through our supplier onboarding process.

7.4 The kinds of decisions we use our tools for:

Customer and supplier onboarding: whether we can onboard you, or a business you are associated with (for example, as a sole trader, partner, director or guarantor), as a customer or supplier; and the credit or trading terms that may apply.

7.5 How these tools influence decisions and what this means for you:

Our tools, which include third-party credit and business information services, risk screening tools and an internal assessment tool, may analyse the information we hold to generate risk ratings and risk indicators. Our personnel consider these outputs together with other information and make the final decision. We do not make these decisions solely by the operation of a computer program.

Decisions supported by these tools may affect whether we enter into a contract, agreement or arrangement with you (or with a business you are associated with), and on what terms, including any credit or trading terms. If you would like more information about how these tools were used in your circumstances, or would like us to review a decision, please contact our Privacy Officer using the details in section 16.

Information about automated decisions relating to job applicants, employees and contractors is set out in our *Workforce and Applicant Personal Data Privacy Policy*.

8 What are our legal bases for processing your data?

8.1 AACo relies on the following legal bases for our data processing (including our marketing) activities.

Legal basis	Details
Consent	We may ask for your consent for Personal Data collection and processing – for instance where we can give you a clear choice about what information you need to provide. You may withdraw your consent at any time, without affecting the Personal Data that we previously processed based on your consent. As outlined in section 6 above, we will ask for your consent before we send you marketing communications unless we are otherwise permitted to do so by law.
Legal compliance	If any law requires us to, we may need to collect, process and hold your Personal Data. For example, under certain tax laws we are required to retain financial data for seven years.
Public interest or vital interests	In limited situations we may use your Personal Data where it is necessary for the performance of a task carried out in the public interest or to protect the vital interests of either you or another person. It is likely to be in the public interest or required to protect someone's vital interests to collect data to prevent crime or dishonesty or safeguard the wellbeing of other people.
Contract compliance	We may collect and process your Personal Data where a contract (including a binding MOU), or any steps necessary before entering into a contract, requires us to do so.

Legal basis	Details
Legitimate interests	In specific situations, we process your Personal Data to pursue our legitimate interests in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests. AACo's legitimate interests include carrying out tasks such as providing our products and services, managing our distribution, customer and supplier arrangements, intra-group transfers, managing and improving our products and services, assessing interest in our products and services, sharing insights with our retail partners, managing our website and its visitors, administering and protecting our organisation (including IT and physical security), and sending updates and marketing information to you or keeping you updated on our projects.

9 Who do we share your Personal Data with?

9.1 We will not share or sell your Personal Data with any third party for their own marketing purposes.

9.2 We may share your personal data with:

- **our employees, contractors and related companies** – who help us run our business;
- **our third-party suppliers, service providers, distributors, and customers (who on sell our products and services)** – who help us and provide our products and services. In many cases, these suppliers are Data Processors who will only act under our instructions and are subject to equivalent contractual data protection obligations as we describe in this Privacy Policy. We do not allow these organisations to use your Personal Data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your Personal Data secure. In other cases, these suppliers are Data Controllers and are required to comply with Privacy Laws in their own capacity;
- **payment systems operators** (e.g., merchants receiving card payments);
- **regulatory authorities** – in order to comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies, where it is in the public interest or for the prevention and detection of crime);
- **other parties in response to legal process** or when necessary to conduct or protect our legal rights (for example, insurers);
- **anyone to whom our assets or businesses** (or any part of them) are transferred; and
- **other third-parties** where you provide consent.

10 Do we store or share your Personal Data overseas?

10.1 AACo may disclose or transfer your Personal Data to third party suppliers outside of the country where you are based (including countries which may not have been determined by the UK Information Commissioner's Office (*UKICO*), Office of the Australian Information Commissioner or equivalent authorities to have a similar data protection regime as your home country). Jurisdictions where we may process your Personal Data include:

- **countries where we have related companies**;
- **countries where our employees and contractors may be located**; and
- **countries in which our service providers may be located**:

At the date of this Policy, these countries include, the United States of America, the United Arab Emirates, India, the Netherlands, Sri Lanka, Singapore, the United Kingdom, countries within the European Union, New Zealand, the Philippines, Korea and Canada.

10.2 When we disclose Personal Data to third parties in overseas locations, we do so by taking reasonable steps to ensure adequate safeguards are put in place to protect your Personal Data. This may include (where applicable) entering into the UK ICO's International Data Transfer Agreement with overseas third-party recipients or anything else which is required or permitted by applicable Privacy Laws.

11 How do we protect your Personal Data?

11.1 AACo is committed to maintaining the confidentiality of all Personal Data that it collects and will take all reasonable steps, and implement appropriate technical controls, to ensure that the Personal Data we collect from you is held securely and protected from misuse and unauthorised access, modification or disclosure. However, AACo cannot and does not guarantee that unauthorised access to your Personal Data will not occur. Accordingly, where consistent with applicable legislation, any Personal Data you provide to AACo will be at your own risk.

12 How long do we keep your Personal Data?

12.1 We only keep your Personal Data for as long as is reasonable and necessary for the purposes described above in section 5 or to comply with our legal obligations, resolve disputes and enforce our legal agreements and policies.

12.2 The period that we retain Personal Data is determined by the type of Personal Data, the category of user to whom the Personal Data relates, and the purposes for which we collected the Personal Data. Other factors impacting the retention period include: legal and regulatory requirements, purposes of safety, security and fraud prevention, or by issues relating to our website and the services we offer you. For example, if you contact us to delete your account, we will delete the information that we collected from you in order to administer your account.

13 What are your rights in relation to your Personal Data?

13.1 You have various rights in relation to your Personal Data, including rights to access, update, delete, restrict processing, or object to or withdraw the use of, your data. You can contact our Privacy Officer to exercise any of your rights in relation to your Personal Data at any time (see section 16 for contact details).

13.2 In particular, here are the things you can ask us to do in relation to Personal Data we hold about you at any time. Please note that these rights may operate differently depending on the country in which you reside – please contact our Privacy Officer if you would like to find out more.

Category	Details
Access	You can request a copy of your Personal Data, including how we first obtained your details. We will provide this as soon as possible, and within 30 days unless there are specific reasons why

Category	Details
	this would not be possible. We will always let you know if this is likely to be the case.
Correct	You can ask us to correct or update your Personal Data when it is incorrect, out of date or incomplete.
Delete	You can ask us to delete or permanently de-identify your Personal Data from our systems. We will do so upon your request, to the extent that we are permitted to do so at law.
Withdraw consent for marketing	You can withdraw your consent for us to use your Personal Data for direct marketing (either through specific channels or all channels).
Restrict processing	Under the UK GDPR, you can request that we no longer engage in profiling or other forms of automated decision-making about you. Such requests may lead to you not hearing from us in future. Please note that this right arises under the UK GDPR and may not be available under Australian law. Under the Australian Privacy Act, you have the right to access and seek correction of Personal Data held about you, and to make a complaint about a breach of the Australian Privacy Principles.
Complain	You can express your concerns or complaints to us about your privacy or the way we are handling your information. We take your concerns seriously and will seek to resolve any issue or concern as soon as possible.
Object	You can object to any form of processing which is based on our legitimate interests (including profiling based on these provisions) or to our direct marketing activities. We will consider your objection and stop processing your Personal Data where justified.

13.3 To protect the confidentiality of your Personal Data, we will ask you to verify your identity before proceeding with any request you make under this Privacy Policy.

13.4 If you have authorised a third party to submit a request or complaint on your behalf, we will ask them to prove they have your permission to act.

13.5 If you are not happy with the way we handle your query or handle your Personal Data (including our response to your request to exercise your rights outlined above), you have a right to lodge a complaint with the relevant privacy or information commissioner in your jurisdiction (the details are set out at section 17 below).

14 Children's online privacy protection

14.1 AACo does not knowingly collect any information from persons under the age of 18 who do not have the consent of their parents or guardians. Our databases may nevertheless contain Personal Data of children under 18 because it is not always possible for us to determine precisely the age of an individual.

15 Changes to AACo's Privacy Policy

15.1 AACo may update or vary this Privacy Policy from time to time and changes will apply immediately. You should review our Privacy Policy regularly to ensure you are familiar with any changes. Your continued use of our website, platforms or our services after any changes to this Privacy Policy will be taken as your acceptance of those changes.

16 AACo's Privacy Officer's Contact Details

16.1 You can contact AACo's Privacy Officer (and representative under the UK GDPR) for any query relating to privacy or this Privacy Policy using the contact details below.

Email	privacy@aaco.com.au
Phone	+617 3368 4400
Address	Attn: Privacy Officer Australian Agricultural Company Limited Level 1, Tower A, Gasworks Plaza, 76 Skyring Terrace Newstead QLD 4006 AUSTRALIA

17 Find out more

17.1 You can find out more about the various privacy laws and other rules, regulations and standards we have mentioned in this Policy, or lodge a complaint where you are not satisfied with the way we've handled your query or your information (as explained in section 13), by visiting the website of the relevant privacy or information commissioner in your jurisdiction. These details are set out below.

Australia	Office of the Australian Information Commissioner https://www.oaic.gov.au/
European Union	European Data Protection Board https://edpb.europa.eu/about-edpb/about-edpb/members_en
UK	Information Commissioner's Office https://ico.org.uk/
USA	Office of Privacy and Civil Liberties https://www.justice.gov/opcl
UAE	UAE Artificial Intelligence and Data Authority

18 Review

18.1 This Policy will be reviewed as required or at minimum every three years.

19 Policy Version History

Policy Information	
Version	Version 1.1
Owned by	General Counsel & Company Secretary
Approval Date	18/11/2026
Approved By	Board of Australian Agricultural Company Limited
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Next Review Date	18/11/2029