

## **Privacy Policy**

### **About this Policy**

Vitasoy Australia Products is committed to protecting the privacy of any personal information held about individuals in accordance with the applicable laws. "Personal information" is information about an identifiable individual, or an individual who is reasonably identifiable, as defined by applicable law. Vitasoy has implemented measures to comply with its obligations under the relevant Australian and New Zealand privacy laws.

This policy applies to Vitasoy Australia Products Pty Ltd (18 088 959 835) and its subsidiaries ("**Vitasoy**" or "**we**" "**us**" or "**our**"), and describes the way that Vitasoy collects, holds and discloses personal information about individuals. This policy forms part of our Terms and Conditions for use of this website, which you should also read.

Privacy statements in relation to our websites and in relation to calls received by our Vitasoy Customer Enquiries Centre are also incorporated into this policy.

### **Why does Vitasoy collect my personal information?**

Vitasoy collects and holds your personal information to allow it to perform its business functions. For example, Vitasoy may collect your personal information to enable you to participate in a Vitasoy promotion, for the uses listed below or to allow Vitasoy to market its current and future products and services to you.

### **What personal information does Vitasoy hold?**

During the course of our business, we may collect personal information from you. If you are a customer of a Vitasoy distributor or franchise owner, we may also collect information about you from the distributor or franchise owner.

The types of personal information Vitasoy collects will depend on the nature of your dealings with Vitasoy and may (but does not always) include:

- Your name;
- Gender;
- Date of birth;
- Address;
- Personal and/or work contact details (including phone/fax number/email address, business name and authorised representative name and contact details, address);
- Your transaction records, product preferences and purchase history and if you are a distributor or supplier, your other dealings with us;
- Records of any queries or complaints that you may make;
- Any information about you which you provide through promotions, competitions or customer surveys; and/or
- Payment details (e.g. credit card number).

If necessary, Vitasoy may also ask you to provide it with additional personal information from time to time, including when you call our Vitasoy Customer Enquiries Centre line.

### **What if you don't provide Vitasoy the personal information it requires?**

If you can't, or won't, provide Vitasoy with the personal information it reasonably requires, Vitasoy may be unable to provide you with the information, goods or services you have requested.

### **How does Vitasoy collect my personal information?**

Vitasoy tries to collect personal information directly from you. That collection generally occurs when you:

- Request information from, or have dealings directly with Vitasoy or one of its related companies;
- Participate in a competition or trade promotion conducted by Vitasoy or one of its related companies;
- Participate in a survey conducted by Vitasoy or one of its related companies;
- Purchase tickets or merchandise from a website operated by Vitasoy or one of its related companies;
- Access or request information from Vitasoy's website, its facebook account, other social media sites or the website of one of its related companies; or
  - Provide information to Vitasoy's Customer Enquiries Centre.

In some circumstances however, Vitasoy may also collect your personal information from other entities covered by this policy or third parties (including Vitasoy distributors or franchise owners), but where it does so, it will ensure that it acts in accordance with relevant privacy laws.

Vitasoy will such take steps as are reasonable in the circumstances (if any) to ensure that you are aware of the purposes for which it collects your personal information. Such notification may be from a Vitasoy distributor or franchise owner where your information is collected (for disclosure to, or on behalf of, Vitasoy) by such an entity.

### **How does Vitasoy use my personal information?**

Vitasoy uses your personal information for the purpose for which it was collected, including (but not limited to):

- Providing you with the Vitasoy goods or services you request;
- Promoting and marketing Vitasoy's current and future products and services (including to you);
- Informing you of upcoming events, special promotions and offers, discounts and other matters which Vitasoy considers may be of interest to you;
- Conducting research (including but not limited to client surveys) concerning Vitasoy's current and future products or services;
- Administering, reviewing and optimising the performance of Vitasoy's distribution network (including allocating customers to distributors/franchise owners) and improving the effectiveness of any software used by the distribution network; and
- Improving the operation or navigation of Vitasoy's website.

Vitasoy may also use your personal information for other purposes which are related to those listed above and which will be made clear to you at the time Vitasoy collects that information, or for such purposes as may be required or permitted by law.

If Vitasoy uses your personal information for direct marketing purposes, all correspondence sent to you by Vitasoy will give you the opportunity to "opt out" of receiving any further direct marketing correspondence. If we use your personal information to send you any direct marketing

communications, you have the right to request that we provide you with the source of that personal information. There is no fee for requesting this information. Unless it is impracticable or unreasonable to do so, we will provide you with the source of the personal information.

### **Vitasoy Australia Products Consumer Enquiries Privacy Statement**

Calls to the Vitasoy Customer Enquiries Centre line (**Calls**) may be recorded for quality, training and verification purposes. Even if your Call is not recorded, in addition to the information set out in the rest of this Privacy Policy, the Vitasoy Customer Enquiries Centre may collect personal information that you provide during the Calls. In relation to personal information provided during Calls, Vitasoy collects, uses and discloses personal information in the following ways:

- **Customer Service:** Vitasoy will use the personal information you provide during Calls to assist in answering your query or addressing your complaint. This may include using information you provide to contact you following the Call in response to your query or complaint.
- **Quality:** If your query or complaint relates to the quality of products or services provided by a Vitasoy stockist or distributor then the personal information may be used to address that issue with the stockist or distributor in question. Generally, it will not be necessary to identify you when the complaint is raised with the stockist and distributor. If it is necessary, we will seek your consent first.
- **Training:** Vitasoy may use the recording of the telephone conversation for internal training purposes.
- **Verification:** If you have a complaint in relation to the quality of Vitasoy products then Vitasoy may retain the recording of the telephone conversation for verification purposes. Vitasoy may also disclose the recording to third parties, including its professional advisors, in order to address the complaint or any action you may take in relation to the complaint.

### **Will Vitasoy give your personal information to anyone else?**

In providing you the information, goods or services you request, Vitasoy may be required to disclose your personal information to:

- Vitasoy's related companies;
- Vitasoy's consultants, contractors and service providers performing services including (but not limited to) promotions agencies, advertising agencies, legal and accounting services, credit reporting, mail-house, transport, prize providers, marketing, data analysis and processing and printing services; and/or
- Vitasoy distributors/franchise owners.

which may operate or hold data in Australia or in overseas countries which may include (but are not limited to) New Zealand and Hong Kong and Japan. If Vitasoy provides your personal information to such a party, Vitasoy generally requires the third party to protect your personal information in the same way Vitasoy does. Please note that Australian law may not apply to some of these entities.

Vitasoy may also disclose your personal information to other third parties where it is required or permitted to under any applicable law.

### **Is my personal information secure?**

Vitasoy takes reasonable steps to ensure personal information it holds about you is protected from risks such as misuse, interference, loss and unauthorised access, use, destruction, modification or disclosure.

No data transmission over the internet is totally secure. As a result, any personal information you send to Vitasoy over the Internet (including via email) is sent at your own risk.

### **Your rights of access and correction**

The accuracy of your personal information is important. Vitasoy takes reasonable steps to ensure personal information it holds about you is accurate, complete, up-to-date, relevant and not misleading. If you believe that any personal information Vitasoy holds about you is incorrect, please contact us on our Vitasoy Customer Enquiries Centre line on 1800 677 852 (Australia) or 0800 730 732 (New Zealand) or please go to our 'Get In Touch' page:

<http://www.soy.com.au/about-vitasoy/get-in-touch/>.

You have a general right to access the personal information Vitasoy holds about you. You may contact Vitasoy Customer Enquiries Centre line on 1800 677 852 (Australia) or 0800 730 732 (New Zealand) or please go to our 'Get In Touch' page: <http://www.soy.com.au/about-vitasoy/get-in-touch/> page to request details of your personal information. Vitasoy can deny your request in some circumstances and if it does so, will provide you with written reasons for that denial. We will take reasonable steps to give access in a way that meets both Vitasoy's needs and your needs.

While there is no fee for requesting access to the personal information Vitasoy holds about you, Vitasoy reserves the right to charge a reasonable fee for the preparation and provision of that information to you.

You also have the right to request the correction of personal information which Vitasoy holds about you. You may do so at any time by contacting our Vitasoy Customer Enquiries Centre line on 1800 677 852 (Australia) or 0800 730 732 (New Zealand) or please go to our 'Get in Touch' page on <http://www.soy.com.au/about-vitasoy/get-in-touch/>. Vitasoy does however reserve the right to refuse to correct your information in some circumstances. If Vitasoy refuses to correct any personal information about you, and subsequent agreement cannot be reached between the parties on this issue, you may request that a note or statement regarding the correction requested be attached to your personal information. We will not charge you a fee for requesting a correction to your personal information, correcting that information or for attaching a statement to your personal information (as relevant).

Even if you don't submit such a request, if we are satisfied that, having regard to the reasons for which we hold your personal information, that personal information is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

### **Changes to this Privacy Policy**

Vitasoy reserves the right to change this Privacy Policy from time to time. If Vitasoy changes this Privacy Policy, it will post a copy of the updated policy on this website and your continued use of this website or interactions with Vitasoy or a distributor or franchise owner following that posting will constitute your acceptance of the terms of the updated policy.

### **How do I obtain more information or lodge a privacy complaint?**

If you:

- Require further information regarding this Privacy Policy or any other steps Vitasoy has taken to protect your personal information or privacy;
- Have any concerns or a complaint regarding Vitasoy's privacy practices or its management of your personal information; or
- Consider that we have breached the APPs,

please contact [Vitasoy Australia Products Consumer Enquiries] on 1800 677 852 (Australia) or 0800 730 732 (New Zealand) or please go to our 'Get In Touch' page on

<http://www.soy.com.au/about-vitasoy/get-in-touch/>.

We acknowledge and take very seriously every privacy query and complaint that we receive. Vitasoy will endeavour to respond to you within 14 business days.

If you're not satisfied with how we have handled your matter, you may wish to contact the Office of the Australian Information Commissioner via the contact details listed at

<http://www.oaic.gov.au/about-us/contact-us-page>.