

Regal Cream Products Pty Ltd trading as Bulla Dairy Foods ACN 005 144 481 Privacy Policy

Regal Cream Products Pty Ltd and its related entities (referred to as **Bulla, we** or **our**) are committed to the protection of your Personal Information in accordance with the Australian Privacy Principles (**APPs**) as set out in the *Privacy Act 1988 (Cth)*.

This Privacy Policy describes the manner in which Bulla collects, holds and uses Personal Information that is covered by the Privacy Act. It is not intended to cover categories of information that are not covered by the Privacy Act. If you wish to make any inquiries regarding this Privacy Policy, you should contact Bulla's Privacy Officer in any of the ways specified in clause 12.

Bulla may, from time to time, review and update this Privacy Policy including, to take into account new laws, regulations and technology. All Personal Information held by Bulla will be governed by our most recent Privacy Policy, posted on our website (www.bulla.com.au) (**Website**). Our most recent Privacy Policy will apply to our collection, use and disclosure of Personal Information.

1. What is "Personal Information"?

"Personal Information" is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in a material form or not.

2. What kind of Personal Information do we collect?

- 2.1 Bulla may collect Personal Information about you such as your name, gender, date of birth, contact details (including your address, phone numbers and emails, whether personal or for work), payment details, or products and services information and preferences.
- 2.2 We may also collect Personal Information when you visit our Website, buy products or services, request information about Bulla, our products or our services, provide feedback, fill in a form on our Website, participate in a promotion or competition, or contact us by telephone, facsimile, email, post or in person.

3. Why do we collect Personal Information?

- 3.1 Bulla collects Personal Information from customers, employees, contractors and other individuals that is reasonably necessary for one or more of our functions or activities, including: in order to allow us to conduct our business functions, to meet any regulatory requirements which apply to our business, to market and sell our products and services and to conduct employee related activities.
- 3.2 You have the option to deal with us anonymously or by using a pseudonym. However you acknowledge that where this is impractical (for example when you enter into a contract with us) or where the law or a court order provides otherwise we are not required to provide these options to you.
- 3.3 If you choose not to provide your Personal Information to us, we may not be able to undertake certain activities for you such as providing you with requested information, products or services.

4. When do we collect Personal Information?

- 4.1 Bulla collects Personal Information directly from you when you: visit our Website, supply or buy products or services, request information about us or our products or services, provide feedback, respond to a survey, enter a competition, change your content or email preferences, enter into an agreement with us, fill in a form or a request for services (including an application for an account with us or an application to participate in a promotion), fill in a form on our Website (including a registration form to register as a member), or contact us by telephone, facsimile, email, post or in person.
- 4.2 If you provide Personal Information about other individuals to us, you must ensure that you have informed those individuals that you are providing their Personal Information to us and that you have obtained their consent and advised them of our Privacy Policy.

- 4.3 Bulla may also collect Personal Information about you via third parties including from our suppliers, merchants, direct mail, events or online marketing.
- 4.4 In some circumstances Bulla may receive Personal Information that we have not requested. If this occurs, we will comply with our obligations under the Privacy Act. You acknowledge that we may de-identify and/or destroy this information unless we are required to keep it by law.

5. Information collected via our website

Website terms of use

- 5.1 This Privacy Policy together with Bulla's Website usage terms and conditions (**Website Terms of Use**) govern how we use, collect or disclose Personal Information provided on our Website. By using the Website you agree to the terms and conditions contained in this Privacy Policy and the Website Terms of Use. Both the Privacy Policy and the Website Terms of Use are posted on the Website (www.bulla.com.au).
- 5.2 Bulla will not collect any Personal Information about users of our Website except when they knowingly provide it or as otherwise described below. For example, Bulla will collect Personal Information from users of our Website when they:
- (a) complete an online form, including subscribing as a member to our Website, registering to receive updates, promotional material or other information, registering an account to purchase products or services from Bulla, or, requesting information or providing feedback; and/or
 - (b) otherwise correspond with Bulla.

Click Stream Data

- 5.3 When you visit and browse our Website, our Website host may collect Personal Information for statistical, reporting and maintenance purposes.
- 5.4 Subject to clause 7.2 the Personal Information collected by our Website host will not be used to identify you. The information may include:
- (a) the number of users visiting our Website and the number of pages viewed;
 - (b) the date, time and duration of a visit;
 - (c) the IP address of your computer; or
 - (d) the path taken through our Website.
- 5.5 Bulla's Website host uses this information to administer and improve the performance of our Website, including to assist with the diagnosis of and to provide support for any issues with our Website or services.

Cookies

- 5.6 Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns.
- 5.7 If you access our Website, a cookie is downloaded onto your computer's hard drive when you first log on to our Website. We use cookies to allow us to personalise your browsing and online shopping experience on our Website.
- 5.8 You can adjust your internet browser to disable cookies, however Bulla may not be able to provide you with all the service or functionality you require on our Website if you choose to do so.

Web Beacons

- 5.9 Web beacons are images that originate from a third party site to track visitor activities. Bulla does not currently use web beacons to track the visiting patterns of individuals accessing our Website.

Advertising

- 5.10 We may use Google and/or other third-party service providers to serve ads on our behalf across the Internet and sometimes on our Website. They may collect anonymous information about your visits to our Website (not including your name, address, email address or telephone number), and your interaction with our products and services. They may also use information about your visits to the Website and other websites to target advertisements for goods and services in order to provide more relevant advertisements about goods and services of interest to you.

Links to external websites

- 5.11 If you follow any links to external websites from our Website, the Privacy Policy and the Website Terms of Use will not apply to those websites which may have their own policies relating to privacy and data collection and website usage. If you choose to access any linked website or to provide any Personal Information on such websites you should review their policies and terms of use to learn more about how they may use your Personal Information. We are not responsible for and will not be liable for the operations or policies of any external website.

6. How Bulla uses the Personal Information it collects about you

- 6.1 Bulla uses the Personal Information it collects about you for our business functions and activities, which may include the following:
- (a) to provide you with information, products or services you have requested including where we engage third parties to provide you with goods or services on our behalf;
 - (b) to promote and market our products and services to you, including to communicate with you via SMS or email newsletters;
 - (c) to provide you with information about other products or services offered by us;
 - (d) to personalise and customise your experiences on our Website;
 - (e) to help Bulla research the needs of its customers and to market its products and services with a better understanding of your needs and the needs of customers generally;
 - (f) to conduct research for the purposes of improving existing products or services or creating new products or services;
 - (g) to provide you with ongoing information about Bulla and our activities in which we believe you may be interested;
 - (h) to allow us to provide third party information and offers in which we believe you may be interested;
 - (i) to use aggregated or de-identified information for the purposes of data analysis, research and reporting;
 - (j) to comply with regulatory or other legal requirements;
 - (k) for purposes related to the employment of our personnel and providing internal services to our staff; and
 - (l) for any other use required or permitted by law or any other purpose communicated to you at the time that the Personal Information was collected or for which you provided your consent.

- 6.2 Bulla may collect and use your Personal Information for a secondary purpose if that secondary purpose is related to the purposes listed above if we have your consent or if otherwise provided for under the Privacy Act.
- 6.3 Generally, Bulla will only collect and use your Personal Information in accordance with this Privacy Policy. In the event that we collect or use Personal Information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with the Privacy Act.
- 6.4 If you choose not to provide your Personal Information to Bulla for the purposes set out in this Privacy Policy, we may not be able to undertake certain activities for you such as providing you with requested information, products or services.
- 6.5 We may use your Personal Information to provide you with direct marketing materials if you would reasonably expect us to or if you consent to receive direct marketing materials. We will seek your consent to provide you with direct marketing materials if we have obtained your Personal Information from a third party. Direct marketing material may include promotional material about us or the products or services we offer.
- 6.6 You may opt out of receiving direct marketing material by contacting us in any of the ways specified in the direct marketing materials or as set out in clause 12.

7. When do we disclose Personal Information?

- 7.1 Depending on the nature of your relationship with Bulla, we may disclose your Personal Information to our shareholders, officers and employees, other businesses within our group of companies, service providers who assist us in our business operations (including third party service providers based overseas), government agencies, parties involved in the purchase or sale of any of our businesses, other third parties, (including parties that we engage to provide you with goods or services on our behalf or who are connected with or involved in our relationship with you), or otherwise as required by law.
- 7.2 Bulla may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner. To the extent that we do share your Personal Information with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this Privacy Policy.
- 7.3 We may also share non-personal, de-identified and aggregated information for research or promotional purposes in connection with providing requested information or services to you, or for the purpose of improving our services. We will not sell your Personal Information to third parties for marketing purposes.
- 7.4 Unless otherwise specified in this Privacy Policy, we or our Website host will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law, is otherwise permitted by the Privacy Act, or is with your consent.

8. Disclosure of Personal Information overseas

- 8.1 Your Personal Information may be disclosed outside of Australia to an entity in a foreign country, including entities in which we have an ownership interest or to third party service providers (**Overseas Entities**). It is possible that Overseas Entities may be subject to foreign laws that do not provide the same level of protection of information as in Australia. Bulla does not currently disclose Personal Information to Overseas Entities.

9. Finding out what Personal Information Bulla holds about you

- 9.1 You are entitled to access Personal Information that Bulla holds about you. If you request access to your Personal Information, we will grant your request unless providing you with access would unreasonably impact upon the privacy of others or is not otherwise permitted under the Australian Privacy Principles or at law. If Bulla refuses your request to access your Personal Information, it will provide you with written reasons for the refusal.
- 9.2 A request for access can be made by contacting Bulla's Privacy Officer in any of the ways specified in clause 12.

10. Storage and security of Personal Information held by Bulla

- 10.1 Bulla will take reasonable steps to protect your Personal Information from misuse, interference and loss and from unauthorised access, modification or disclosure. We will comply with our obligations under the Privacy Act in relation to any Personal Information that we handle, including information which is held on our computer systems.
- 10.2 Any Personal Information that is collected via our Website or which is held on Bulla's computer systems is protected by safeguards including physical, technical (eg firewalls, SSL encryptions etc) and procedural methods.
- 10.3 Personal Information that is held by Bulla in hard copy is stored securely on its premises and is only disclosed or used for the purposes described in this Privacy Policy.

11. Updating and correcting your Personal Information

- 11.1 Bulla takes reasonable steps to ensure that the Personal Information that we hold is accurate, up-to-date and complete.
- 11.2 You can update your contact and Personal Information by contacting us in any of the ways specified in clause 12 or at any time on the Website – just follow the prompts. Bulla welcomes any changes to your details so as to keep our records up to date.
- 11.3 We will keep your Personal Information only for as long as required for our business purposes and otherwise as required by Australian law. Where we no longer need to keep your Personal Information, we will take reasonable steps to destroy or de-identify your Personal Information. If you wish to have your Personal Information destroyed or de-identified, please let us know and we will take reasonable steps to do so (unless we need to keep it for legal, auditing or internal risk management reasons, or as otherwise required by law).

12. How to contact us for more information or to make a complaint

If you feel that your privacy has not been respected or that Bulla has conducted itself inconsistently with this Privacy Policy, the Australian Privacy Principles, a registered APP Code and/or the Privacy Act in respect of your Personal Information, or for any other queries, problems, complaints or communication in relation to this Privacy Policy, please contact our Privacy Officer in any of the following ways:

email: service@bulla.com.au

write to: Attn: Privacy Officer

Regal Cream Products Pty Ltd, PO Box 318, Sunshine, MDC, Vic, 3020.

You can find out more information about the Privacy Act and the Australian Privacy Principles from the Office of the Australian Information Commissioner. The Information Commissioner may be contacted at www.oaic.gov.au or by email at enquiries@oaic.gov.au.

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