

March 2015

## **Sydney Markets Website Policy**

Sydney Markets Limited (ABN: 51 077 119 290)

### **1. Application of Policy**

Sydney Markets Limited (ABN: 51 077 119 290) ("Sydney Markets Limited" or "we" or "us" or "our") is strongly committed to protecting your privacy. The following Privacy Policy applies to Sydney Markets Limited and its affiliates including but not limited to "Sydney's Paddy's Markets" and the "Fresh For Kids" program. The Policy provides a clear outline of how and when personal information is collected, used, stored and processed by us.

### **2. Our Commitment**

We handle personal information provided by and about people every day. Personal Information, for the purposes of this Policy and the Privacy Act 1988 (Cth) ("Privacy Act"), means any information or opinion about a person whose identity is apparent or can reasonably be ascertained by that information or opinion.

The aim of Sydney Markets Limited is both to support and to ensure that we comply with the Privacy Act and the Australian Privacy Principles ("APPs") contained in the Privacy Act. Sydney Markets Limited also seeks to comply with the Spam Act 2003 (Cth) ("Spam Act") which is aimed at reducing the number of unsolicited electronic commercial messages that you receive.

The information set out below is largely a summary of our obligations under the Privacy Act, in particular the relevant APPs. We believe that this Policy will address any potential concerns you may have about how



personal information you provide Sydney Markets Limited is collected, held, used, corrected, disclosed and transferred.

On request you can obtain more information about the way we manage the personal information we collect, hold, use and process, via the contact details at the end of this Policy.

### 3. Collection of Personal Information

In the course of our providing our products and services, we collect, hold, use and process your personal information. Personal Information may also be collected when individuals make enquiries about Sydney Markets Limited's products and when individuals provide personal information intended for publication on the Sydney Markets Limited website, such as in the provision of online blogs, newsletters and articles (if any). Personal Information may also be collected when using one of our mobile applications.

The main purposes for Sydney Market Limited collecting personal information include:

- to provide our services;
- to manage employee records (including job applications), contractor records and lessee or occupier records;
- to handle complaints;
- to operate and run websites managed by us (including but not limited to the Sydney Markets Limited website, the Sydney's Paddy's Markets website or the Fresh for Kids website);
- when we are contacted for further information;
- when you participate in surveys and other types of research, or when we conduct publicity or marketing campaigns;
- to send out newsletters and updates on our mailing lists, and when you subscribe to our mailing list (including but not limited to





lists for Sydney Markets Limited, Sydney Paddy's Markets and Fresh For Kids);

- when you register your details on the Sydney Markets Limited website, the Sydney's Paddy's Markets website or the Fresh for Kids website;
- when you express an interest in a service provided by us;
- when you enter a competition or promotion run by us;
- when you submit information through various mobile applications including the Paddy's App.

We will only collect personal information from you that is necessary for one or more of our functions and activities.

We will only collect personal information from you by lawful and fair means, without being unreasonably intrusive, such as when you complete an application form or make an enquiry with us. At or before the time we collect personal information from you we will take reasonable steps to inform you why we are collecting that personal information, who else we might disclose that personal information to and what will happen if you do not provide personal information to us.

Where reasonable and practicable, we will only collect personal information about you, from you. Wherever it is lawful and practicable, we will give you the option of not identifying yourself or not providing personal information when entering transactions with us. However, failure to provide full and complete information we request may mean that we are unable to provide services to you fully and properly.

Once we hold personal information we will take reasonable steps to keep it accurate, complete and up-to-date.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may





collect, use and disclose such information for the purposes described in this Policy.

#### **4. Use and Disclosure of Personal Information**

We will only use your personal information for the main purpose we told you it was needed for, except where you consent to us using that personal information for another purpose, where the other purpose is related to the main purpose and you would reasonably expect us to use the personal information for that other purpose, or where it is permitted or required by law, or we reasonably believe it is necessary on health or public safety grounds to use the personal information for another purpose.

In order to fulfill the purposes set out above, we may provide access to your personal information to third parties with whom we have a business relationship, for example those who maintain and update our database (including those who manage our websites).

Where possible (for example, where not otherwise required by law, regulatory standards or as reasonably necessary in the provision of our services), we will take steps to de-identify your personal information, if such information does not require disclosure.

Where possible (for example, where not otherwise required by law or regulatory standards), prior to the online publication of personal information we will ensure the de-identification of personal information is undertaken. This enables the value and utility of information published and provided on online resources to be maximised.

Sydney Markets Limited will de-identify personal information by removing or modifying identifying features such as name, address, or date of birth, remove or modify quasi-identifiers such as general, profession or income and /or by suppressing or modifying data with broader categorisations.





You accept that not all recipients of your information may have privacy policies equivalent to Sydney Markets Limited's and you consent to the disclosure of your personal information for those purposes.

There are some circumstances where by law we are required to disclose your personal information, including to Courts, Tribunals or law enforcement agencies.

In relation to direct marketing, where practicable we will seek your consent before we use your personal information for this purpose. You may tell us at any time you do not wish to receive any further direct marketing materials – if you do, we will stop sending you such materials.

In accordance with the Spam Act, should you wish to unsubscribe from commercial electronic messages from Sydney Markets Limited, all future commercial e-mail from Sydney Markets Limited, Sydney's Paddy's Markets or Fresh For Kids will enable you to unsubscribe from that particular type of electronic message and this can be done at any time. If you do not unsubscribe, we will continue to send you relevant information of the types described above.

Sydney Markets Limited may also use messaging methods other than email.

## **5. Access and Correction of Personal Information**

If you ask, we will tell you what personal information we hold about you, and what we do with it. Following receipt of your request, we will facilitate access by allowing you to inspect your personal information, providing copies of or a summary of the relevant documents or by providing access by other means appropriate in the circumstances.

If you can show us that the personal information is inaccurate, we will take reasonable steps to correct it. Note we do not need to provide access to personal information in several types of situation, including but not limited to where the request is frivolous, or where to provide access





would pose a threat to health or public safety, unreasonably interfere with another person's privacy, or be a breach of the law.

If access is refused, we will provide you with our reasons for doing so.

## 6. Security

We will protect personal information from misuse and loss, and destroy or permanently de-identify personal information we no longer need.

## 7. Online Publications

This part specifically relates to articles, newsletters blogs and any other information published online by Sydney Markets Limited and/or guest contributors to the Sydney Markets Limited website and Sydney Markets Limited publications. Sydney Markets Limited, and Individuals (including you) must adhere to this Policy, and any other relevant policy or document, when making use of online publications and resources. Where possible, Sydney Markets Limited will make use of pseudonyms when publishing articles, blogs and any other online material, unless consent is expressly provided.

## 8. Cookies

When you visit Sydney Markets Limited website, the Sydney's Paddy's Market website or the Fresh For Kids website, details may be collected and recorded about your visit, such as the time and date of your visit, your server or IP address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

For the same reason, we may use cookies to identify your browser so that next time you visit our website we remember your website and search preferences. A cookie is a small file which remains on your computer's hard drive and contains information enabling our website to recognise your browser and your browser preferences. If you do not wish to use cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.





Please note that third party websites that are accessed from our website may also use cookies, however we are not liable or responsible for this.

#### **9. Identifiers**

We will not adopt as our own any identifiers that you may provide to us including but not limited to tax file numbers, Medicare numbers etc.

#### **10. Third Party Websites and Links**

Sydney Markets Limited website, the Sydney's Paddy's Market website and the Fresh For Kids website contains a number of links or "hot buttons" to various third party websites. Links also exist where it is necessary to lead to a relevant technology download site, which may be required to run an application.

Sydney Markets Limited accepts no responsibility for the content of these linked website, or the privacy practices and privacy policies of the linked third party websites.

We recommend that you read and privacy policy displayed on these linked sites if you decide to visit them.

#### **11. Overseas Disclosure of Personal Information**

We may from time to time transfer and/or store your personal information we collect outside Australia in accordance with the Privacy Act, to countries whose privacy laws do not provide the same level of protection as Australia's privacy laws.

We may also use cloud storage and IT servers that are located offshore.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and, when permitted by law to do so on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian privacy laws in relation to your information.





## 12. Fresh for Kids Privacy

Sydney Markets Limited encourages kids (and their parents, guardians or teachers) to get as much as possible out of the “Fresh for Kids” website, which is operated and maintained by Sydney Markets Limited. However, we also want to ensure that all “Fresh for Kids” visitors know as much as they can about protecting the private and personal information of visitors.

This component of the Policy applies only to the Fresh for Kids website, and not to the websites of other companies and organisations that are linked to Fresh for Kids, or to other websites operated by Sydney Markets Limited.

The following is a list of simple guidelines about kids’ privacy and safety on the World Wide Web:

- Kids, always get your parents, guardian or teacher’s permission before giving out any information or any details that you think might be personal. This includes your name, address, phone number or age.
- Parents, guardians and teachers, talk to your kids about the release of personal information and ensure everyone understands what the reasons for giving it out are.
- Kids, never give information out to people or on websites without your parent, guardian or teacher’s permission.

The Fresh for Kids website allows you to choose what kind and how much information you provide to us, and to control how we use the information provided.

On the Fresh for Kids website there is a wide range of information, activities, entertainment and competitions, the vast majority of which does not require the collection of personal information.







There are however some parts of the Fresh for Kids website that do ask for users to enter personal information. If you choose not to register or enter personal information, or a parent, guardian or teacher does not give you permission, you will still be able to use most of the Fresh for Kids website.

Children living in NSW and the ACT may also join the “Fresh for Kids Club” (the Club). The Club offers an enhanced experience by giving members the opportunity to receive prizes not available to users who are not members of the Club. Members are also able to log into the Fresh for Kids website using a password, without having to resupply their personal information every time they visit the Fresh for Kids website. It is not compulsory for users to become members of the Club in order to use the Fresh for Kids website.

Information is collected primarily to make it easier and more rewarding to use our services, including the ‘Fresh for Kids,’ website. Depending on the service you are accessing, you could be asked to provide information such as your name, email address or information about what you like or do not like (remember you must ask your parents for their permission). We will use the information that you provide to respond to your questions and requests (as well as sending out any prizes to which you may be entitled). It is entirely your choice whether to respond to these requests for personal information or not and we will indicate when certain information is necessary before we are able to respond to you. Where possible we will make clear why we are collecting your personal information at the time it is collected.

The personal information collected by the ‘Fresh for Kids,’ website is not on sold to any third party. In some circumstance we may need to disclose personal information to third parties where we have retained those third parties to assist us in relation to the ‘Fresh for Kids,’ program and providing the products or services you have requested, such as our IT service providers and delivery people. Personally identifiable information is not displayed anywhere in the ‘Fresh for Kids,’ website.





E-mails from 'Fresh for Kids,' website visitors that are sent to the 'Fresh for Kids,' e-mail address are responded to (if appropriate) and then deleted from Sydney Markets Limited's readily accessible systems. Sydney Markets Limited does not engage in mass e-mailing unless 'Fresh for Kids Club' members elect to receive update emails. 'Fresh for Kids Club' members may choose not to receive email updates. From time to time, Sydney Markets Limited may conduct research via competition entries. Only non-personally identifiable information is used for this research, such as favourite type of fruit and vegetable, postcode and the age of the entrant. This research will not be used for any purpose other than to help us make both the 'Fresh for Kids,' website and the Fresh for Kids Program both fun and interesting for kids, parents, guardians and teachers.

All other aspects of the Sydney Markets Limited Policy apply to the use of the Fresh for Kids website and service.

### **13. Complaints resolution**

We are committed to providing customers, clients, and other parties whose personal information we hold, a fair and responsible system for the handling of their complaints.

If at any time you have any complaints in relation to privacy, please contact our Privacy Officer at one of the points referred to below. We will seek to address any concerns that you have through our complaints handling processes. If you wish to take matters further you may refer your concerns to the Office of the Australian Information Commissioner the details of which are further below.

### **14. Changes to this Policy**

We are constantly reviewing our statements and policies in an attempt to keep up to date with market expectations and legal developments. Subsequently, we may change and update this Policy from time to time as the need arises.





A copy of this Privacy Policy will be available on the Sydney Markets Limited website, the Sydney's Paddy's Market website and the Fresh For Kids website and will also be available on request. Clients, consumers and other parties whom which personal information is collected from, acknowledge and agree to comply with this Privacy Policy as amended from time to time.

#### **15. Contact Us and Further Information**

If you seek further information from Sydney Markets Limited or have any comments about this Policy, or information on how we deal with privacy generally, please contact our Privacy Officer at one of the reference points below:

Email: [info@sydneymarkets.com.au](mailto:info@sydneymarkets.com.au)

Address: PO Box 2

Sydney Markets NSW 2129

Phone: 02 9325 6200

Fax: 02 9325 6288

Note if you are under the age of 18 you will require permission from your parent or guardian to contact us.

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au)

#### **Sydney Markets Limited**

