

Privacy Policy

T-Ports Pty Ltd ACN 620 129 544 of Level 4, 91 King William Steet, Adelaide SA 5000 (**we, us or our**) is committed to protecting the privacy of your personal information.

Personal information is information that identifies you or information by which your identity can reasonably be ascertained and may include an opinion about you (**Personal Information**).

We collect, use, store, manage and disclose all Personal Information in accordance with this Privacy Policy and otherwise with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Privacy Act**).

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1. About this Privacy Policy

This Privacy Policy explains how we collect, use, manage and disclose Personal Information and how you can contact us if you have queries about our management of your Personal Information.

This Privacy Policy applies to all Personal Information submitted to or collected by us through the use of our services including our website (www.tports.com), app or social media sites, or where you otherwise contact or interact with us through other forms of communication.

By submitting personal information to us (including via our website or social media sites or using our services), you accept the terms of this Privacy Policy, and consent to our use, collection, disclosure and retention of Personal Information as described in this Privacy Policy.

If you do not agree to any provisions in this Privacy Policy, you should not disclose any Personal Information to us.

You are welcome to print or download this Privacy Policy at any time at www.tports.com.

Please note that this Privacy Policy may be updated or revised from time to time without notice and changes will apply immediately. Changes to this Privacy Policy will be published by posting an updated Privacy Policy on our website. Therefore, you should review our Privacy Policy regularly to ensure you are familiar with any changes.

If you do not agree with the changes to our Privacy Policy, please notify us immediately in writing. Unless we hear from you, or if you continue to use our services, website or social media sites, you are taken to have accepted the changes to our Privacy Policy.

This Privacy Policy was last updated on 3 October 2023.

2. What kind of Personal Information do we collect and hold?

2.1. General

As part of offering our services to you, it is likely that we will collect Personal Information about you. In addition, you may need to create a user account as a registered user to use some of our services. The Personal Information we collect may include:

- your first and last names;
- your phone number (including mobile numbers);
- your mailing address, business address and email address;
- user name of your account;
- any further information, instructions or comments given by you;
- details of the services you have purchased, considered or enquired about, together with any additional information necessary to deliver those services and respond to your queries;
- payment information such as name, account number and payment card details for payments processed by us or third party payment gateway;
- any additional information relating to you that you provide to us directly or indirectly through our representatives or our website or social media sites, including via customer surveys or user feedback;
- any photos that is captured as a result of using our services; and
- any other Personal Information you provide to us from time to time.

2.2. Sensitive Information

We do not collect “sensitive information” as defined by the Privacy Act (such as information about ethnic origin, religious or political views, health information, tax file numbers etc) from you.

If you voluntarily submit sensitive information to us, you consent to our collection of such sensitive information and we will only use or disclose such information:

- for the purpose for which it was provided or another directly related purpose; or
- as allowed by law.

3. How do we collect Personal Information?

3.1. Personal Information

We may collect Personal Information via a variety of avenues, including when you:

- create a user account with us as a registered user on our website (via our web portal) or on our app;
- telephone, email or online communicate with one of our representatives;
- access or use our website or social media sites; or
- participate in surveys.

We may also collect Personal Information about you from a third party (e.g. National Grower Register and social media platforms).

3.2. Choosing not to Disclose Personal Information

You have the option of not disclosing Personal Information to us or to use a pseudonym when dealing with us in relation to a particular matter. If you choose to withhold any Personal Information, we may not be able to provide you with part or all of our services or resolve a particular matter raised by you.

3.3. When you Browse our Website

When you only browse our website, we do **not** collect your Personal Information until you have created a user account with us as a registered user. Our internet service provider or we may make a record of your visit and records your email address (if provided) and other non-personal information such as your server address; your internet protocol address; the pages you accessed and documents downloaded; the previous site you visited; and the type of browser being used. The non-personal information assists us to analyse web traffic and improve your site navigation experience.

We do not identify you or your browsing activities except, in the event of an investigation, where a law enforcement agency may exercise a warrant or other such power to inspect the internet service provider's logs.

3.4. Cookies

We may also obtain anonymous information from our website using a technology called "cookies". Cookies are small text files that are placed on your computer, tablet, or mobile device when you visit a website. They are widely used to enhance your browsing experience, remember your preferences, and collect information about how you interact with websites. We use the following cookies:

- **Necessary Cookies:** These cookies are essential for the proper functioning of our website. They enable you to navigate our site and use its features, such as accessing secure areas.
- **Analytical Cookies:** We use analytical cookies to gather information about how visitors use our website. This data helps us improve our website's performance and user experience. These cookies do not collect personally identifiable information.
- **Third-Party Cookies:** Some of our pages may display content from third-party websites, such as social media sharing buttons. These third-party sites may use their cookies, and we do not have control over their cookie policies.

If you wish, you can disable your web browser from accepting cookies.

3.5. Other Social Platforms

There may also be occasions when we collect Personal Information (to the extent it is available) from social media platforms such as Facebook, Twitter, Instagram and LinkedIn.

If you engage or contact us on one of our social media platforms or otherwise direct us to communicate or engage with you via social media, you agree to allow us to receive information (which may include Personal Information) from our social media platforms. You also allow us to receive information about your visits and interaction with the sites and services of any of our third party partners that include our cookies and similar technologies unless you opt out.

In addition to cookies, we use the Facebook Pixel, a tracking tool provided by Facebook, Inc. When you visit our website, the Facebook Pixel may collect data that allows us to track the effectiveness of our Facebook advertising campaigns. This data may include information such as the pages you visit on our website and your interaction with our content.

4. How we use your Personal Information

4.1. General

We may use the Personal Information you provide to us for the purposes for which it was initially collected or purposes related to such initial purpose (if such purpose would be within your reasonable expectations). We may use the Personal Information you provide to us to:

- provide you with services you have requested from us;
- respond to your queries and requests, to resolve complaints and to respond to social media;
- keep a record of our dealings with you and enable us to contact you when necessary;
- promote relevant services which may be of interest to you via direct marketing or tailored advertising; and
- enabling the connection of registered grain buyers to growers in relation to the purchase of products or services of interest to them (including, where you are a grower, the transmission of your Personal Information to the registered buyers to facilitate the connection).

We may also use your Personal Information for purposes authorised by laws or regulations, such as to prevent or investigate alleged crime or fraud.

4.2. Text message updates

By supplying us with your Personal Information, you give us permission to use your Personal Information to contact you to provide you with updates regarding the services you have requested from us such as opening and close times of our sites, notices of meetings and other update relevant to site operations. You can choose to opt out of such updates in the future by contacting us using the contact information provided in this Privacy Policy or via text message.

4.3. Direct Marketing

By supplying us with your Personal Information, you give us permission to use your Personal Information to contact you to inform you about services we think would be of particular interest to you, including from other businesses operated by or related to us. This may include contacting you through direct marketing, events and competitions, public relations and social media. This permission is not limited in time unless you choose to opt out by contacting us using the contact information provided in this Privacy Policy, or by utilising an 'unsubscribe' facility on a communication we send to you in which case we will take steps to ensure you do not receive any such direct marketing information in future.

4.4. Polls and Surveys

We or third parties may contact you in relation to your participation in polls and surveys, such as our annual grower surveys, deliver incentives to you to participate in such surveys or polls, or target advertisements to you based on your answers to the poll. We may share the aggregated demographic information in these polls and surveys with our sponsors, advertisers and partners. If, however, we conduct a poll or survey and wish to disclose your Personal Information to any third party, we will first explicitly seek your consent to do so. If a third party conducts a poll or survey and receives your Personal Information, then your Personal Information will be used and disclosed in accordance with the privacy policy of that third party.

4.5. Rate and Review

If you submit a review, rating, photograph or comments in relation to our services, you agree that we may publish part or all of your review, rating, photograph or comments together with your first name.

5. How your Personal Information may be Disclosed

We do not sell, rent, lease or provide your Personal Information to other entities unless outlined in this Privacy Policy. We may disclose your Personal Information where you have consented or when disclosure is necessary to achieve the purpose for which it was submitted (as outlined above). In addition, we may receive and disclose Personal Information from or to our related entities.

5.1. Business Associates and Contractors

We may disclose your Personal Information to organisations that carry out functions on our behalf, or assist us to deliver our services, such as our business associates, contractors, agents or service providers. These third parties may change from time to time. Some examples include:

- carefully selected suppliers and other third parties with whom we have commercial relationships, for business, marketing and related purposes, including grain buyers;
- financial services providers, such as our banks or third party supplier for securing payment of the services we provided to you, and, where applicable, debt collectors;
- technology service providers, such as internet service providers, database management services, data storage providers, website hosting companies, website developers and digital mail providers who send communications on our behalf;
- sponsors or organisations that partner with us; and
- our professional advisers, accountants, lawyers and auditors.

You agree that third parties which receive Personal Information from us may use and disclose the Personal Information subject to their respective privacy policies. We endeavour to take reasonable steps to enter into agreements with third parties that collect, store, disclose and retain Personal Information in accordance with the Australian Privacy Principles, except as otherwise required by law.

5.2. Statistical Data

From time to time, we may provide third parties with information in the form of statistical representations about our users collectively and for the purpose of statistical analysis. Where we provide such information to third parties for this limited statistical purpose, we will not provide Personal Information in such a way that your identity may be obtained.

5.3. Permitted Disclosures by Law

We may also release your Personal Information under the following circumstances:

- when required to do so by a court or under applicable laws or regulation (for example, a subpoena) or where requested by a government agency;
- where we consider a company or an individual may be engaged in fraudulent activity or other deceptive practices that a governmental agency should be made aware of; or
- to appropriate persons, where your communication suggests possible harm to others.

5.4. International Disclosures

We do not generally transfer Personal Information outside of Australia.

5.5. Links to Other Sites or Social Platforms

We may provide links to third party websites within our website and social media sites. These linked sites are not under our control, and we do not accept responsibility for the conduct of companies the websites of which are linked to the website. Before disclosing your Personal Information to any third parties on such websites, we advise you to examine the terms and conditions of using that website and its privacy statement.

6. Security

We consider confidentiality of Personal Information collected from you to be of utmost importance.

To prevent unauthorised access to, disclosure, misuse or loss of, or interference with, your Personal Information, we have implemented a number of procedures to safeguard the security and confidentiality of your information including:

- instructing our staff and advisers who handle personal information to respect the confidentiality of user information and the privacy of individuals;
- encrypting data packets, implementing secure authentication and authorisation procedures (including passwords and controls) and installing equipment to safeguard your information;
- implementing procedures and installing equipment to safeguard your information; and
- continually reviewing privacy procedures and arrangements to ensure we are doing all that we can reasonably and technically feasible at the time.

We store the Personal Information in our Secure CSM (Commodity Stock Management System) and our finance platform (Xero, where applicable). Unfortunately, since no system is 100% secure or error-free, we cannot guarantee that your Personal Information is totally protected, for example, from hackers or misuse. Except to the extent that liability cannot be excluded or limited due to applicable law, we assume no liability or responsibility for disclosure of your Personal Information due to unauthorised third party access, errors in transmission or other causes beyond our control.

If you enter or upload Personal Information on our website, software or app, you should exercise due care to safeguard any passwords and usernames created by you.

We will take reasonable steps to destroy or permanently de-identify any Personal Information from our records and systems which is no longer required by us. We may retain your Personal Information even after you have completed your transactions with us if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, prevent fraud or abuse or enforce this Privacy Policy and our terms and conditions. We may retain Personal Information for a limited period of time, if requested by law enforcement.

7. How to access and amend Personal Information you provide

We strive to keep your Personal Information accurate, up to date and complete. Our policy enables you to find out what information we hold about you and correct that information if it is wrong.

If you become aware that any Personal Information we hold about you is incorrect or out of date, you may correct the Personal Information by logging into your customer account. Otherwise, please let us know immediately. We will be happy to accept updated Personal Information in writing from the owner of that information at any time. However, in order to protect your privacy and security, we will take reasonable steps to verify your identity before granting you access or enabling you to make corrections of your Personal Information. Except where the Privacy Act provides otherwise, we reserve the right to recover any reasonable costs involved in providing extensive access to Personal Information, for example the cost of supplying information held in archives.

Our objective is to respond to any request to access personal information within a reasonable timeframe and no later than thirty (30) days. We will endeavour to inform you if this timeframe is not achievable.

In some circumstances, we may not be in a position to grant access to your Personal Information, such circumstances include where:

- providing access is likely to pose a serious threat to the safety of an individual or the public;
- providing access is likely to unreasonably impact on the privacy of others;
- the request for access is frivolous or vexatious;
- providing access would reveal information which relates to existing or anticipated legal proceedings or otherwise impact on any negotiations;
- providing access is unlawful (including being unlawful as directed by a court or tribunal order) or is likely to impact on actions being taken in relation to alleged unlawful activities relating to our functions and activities; or
- granting access would impact on a commercially sensitive decision-making process.

8. Contact Us

If you have any questions about our Privacy Policy, or have a problem or complaint, please let us know. We will respond to a complaint as soon as possible, but within ten (10) working days, to let you know who is responsible for managing your complaint. We will also try to resolve the complaint within 30 days. When this is not possible, we will endeavour to contact you within that time to let you know how long it will take to resolve the complaint.

Our contact details are:

Privacy Officer
T-Ports Pty Ltd ACN 620 129 544
Address: Level 4, 91 King William Street, Adelaide SA 5000
Phone: 1800 87 67 87
E-mail: admin@tports.com

If you believe we have not adequately dealt with your complaint, you may complain to the Privacy Commissioner, whose contact details are found on their web site <http://www.oaic.gov.au/>.