

## Privacy Policy

Food Ladder (registered charity, ABN 89 132 323 347) (**Food Ladder, we, our, us**) recognises the importance of protecting the privacy and rights of individuals in relation to their personal information. This document is our privacy policy and it explains how we collect and manage your personal information.

We respect your rights to privacy under the *Privacy Act 1988 (Cth)* (**Act**) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

### 1. What is your personal information?

When used in this privacy policy, "**personal information**" means any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

### 2. What is your sensitive information?

When used in this privacy policy, "**sensitive information**" means any personal information that is sensitive such as information about a person's health, criminal record, racial or ethnic origin or sexual orientation or practices.

### 3. What type of personal information do we collect and hold?

Food Ladder may collect the following types of personal information:

- name;
- age bracket;
- email address;
- mailing or street address of relevant food production system;
- telephone number;
- any additional information (including sensitive information) relating to you that you provide to us directly through our website, written forms, in-person, by email, telephone or indirectly through use of our website or online platform, or interaction with our social media accounts or otherwise.

**4. How do we collect your personal information and sensitive information?**

We collect your personal information and sensitive information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in the following ways including:

- through the use of our website or online platform;
- through survey questions you have responded to either online, in-person, written or by telephone;
- during conversations between you and our representatives in person or online including via our website, online platform, email or social media.

**5. What happens if we can't collect your personal information?**

When we do require your personal information, and you do not provide us with such information, such as non-completion of our monthly surveys, we may not be able to provide you with the requested services which may include access to our online platform, either to the same standard or at all.

**6. For what purposes do we collect, hold, use and disclose your personal information?**

Food Ladder collects, holds, uses and discloses your personal information for the following purposes:

- the administrative, planning, service development and related purposes of Food Ladder and its related bodies corporate, contractors and service providers;
- to answer enquiries and provide information, advice or support for our horticultural and social enterprise programs;
- processing applications for employment or volunteering with Food Ladder;
- to provide services to you and to send communications requested by you;
- to assess the performance of our website or online platform and to improve the operation of the website or online platform;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or mandatory reporting obligation, or in co-operation with any governmental authority of any country.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

## **7. To whom may we disclose your information?**

We may disclose your personal information to:

- our employees, contractors or service providers for the purposes of operating our website or online platform, or our business activities, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, and professional advisors such as accountants, solicitors, business advisors and consultants;
- if required by law; and
- any organisation for any authorised purpose i.e. with your express consent.

We may disclose information that has been de-identified, meaning that it does not personally identify you and is therefore no longer “personal information” under the Act.

## **8. Direct marketing materials**

We may use your personal information to provide you with marketing information or material by post, email or telephone. If we do so, we will identify Food Ladder as the sender and provide you with an opportunity to opt-out of receiving direct marketing materials. By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future.

## **9. How can you access and correct your personal information?**

You may request access to any personal information (including sensitive information) we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or email). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information (including sensitive information) we hold about you is incorrect, incomplete or inaccurate, then you may make a request for us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for

amendment, then we will add a note to the personal information stating that you disagree with it.

#### **10. Overseas disclosure**

We may disclose personal information to our third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

#### **11. Security**

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. We will take reasonable steps to destroy or de-identify your personal information once it is no longer needed.

As our website and online platform are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

#### **12. Links**

Our website or online platform may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party websites and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

#### **13. What is the process for complaining about a breach of privacy?**

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can ensure the accuracy of the complaint. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receiving your complaint to discuss your concerns and outline options to resolve it in timely and appropriate manner.

#### **14. Contacting us**

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

Please contact our Privacy Officer at:

Post: Po Box 423, Manly, NSW 1655

Email: [privacy@platform.foodladder.org](mailto:privacy@platform.foodladder.org)

#### **15. Changes to our privacy policy**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. Please review it regularly.

This privacy policy was last updated on 13 November 2020.