



Namoi Cotton Group

Privacy Policy

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Privacy Policy.

1. PURPOSE

The purpose of this document is to outline the policy for the way the Namoi Cotton Group collects, uses, discloses and manages your personal information and compliance with the Privacy Act. The policy applies to Namoi Cotton Limited (ACN 76 010 485 588) and its subsidiaries, associates, equal or majority joint ventures and related entities (known as the “Namoi Cotton Group”).

2. SCOPE

This policy and procedure applies to all Employees of the Namoi Cotton Group and external contractors which may be engaged to manage personal information for individuals providing information to the Namoi Cotton Group. Employees of the Namoi Cotton Group include without limitation part-time and full-time employees, casual employees and directors.

3. PERSONAL INFORMATION AND WHAT IS COLLECTED

Personal information for the purpose of this privacy policy has the same meaning as in the Privacy Act. Personal information generally relates to a natural living person (i.e. does not include entities such as a company) and is information from which a person can be identified. Personal information may include the person’s name, address, email address or occupation. If the information collected can reasonably identify you then it will be considered to be personal information.

Personal Information the Namoi Cotton Group may collect includes:

- names, physical address, date of birth, gender, telephone number(s);
- tax file numbers, Australian Business Numbers and bank account details, driver’s license;
- names and locations of the individual growers’ properties, payment details, information used to assess any credit application;
- your personal lifestyle preferences and leisure activities;
- individual surveys you may provide on-line or by customer representatives;
- incident details or statements;
- medical information and records; and
- information collected when acquiring Namoi Capital Stock and Namoi Grower Shares.

Personal Information is collected by:

- collection of forms, over the phone with Namoi Cotton Group representative’s;
- general conversations with Namoi Cotton Group representative’s;
- completion of contracts and client confirmation forms whether on-line or hard copy;
- completion of surveys online and hard copy;
- in case of incidents cctv footage, statements and medical consultants;

- when you apply for employment with the Namoi Cotton Group;
- when you apply for finance with the Namoi Cotton Group;
- when you apply to do business under the Namoi Cotton Group's AFSL;
- when you provide feedback by the Namoi Cotton Group Grower Portal;
- acquisition of Namoi Capital Stock and Namoi Cotton Group Grower shares;
- completion of forms online or hard copy for acquisition and sale of Namoi Capital Stock; and
- data agencies, credit report agencies, law enforcement agencies and government entities public and available by application.

Sensitive information is a category of personal information which is provided an additional level of protection. Sensitive Information includes information on your health, race, ethnic origin, religious beliefs, sexual orientation and criminal record. For the purposes of this policy references to personal information includes Sensitive Information.

The Namoi Cotton Group may collect "Government Related Identifiers", such as tax file number or driver's licence number. Such information will be collected if reasonably necessary to verify your identity to carry out business with you, or as part of your employment, or if the collection and use is required under law. The Namoi Cotton Group do not have an adoption process for Government Related Identifiers to identify you.

4. USE OF PERSONAL INFORMATION

If you are a client of the Namoi Cotton Group, the personal information we collect is used to:

- provide cotton ginning and marketing and associated services and products;
- determine eligibility to provide grower finance;
- manage our cotton business relationship with you;
- promote and market current pricing, products and other products and services to you;
- carryout research for the provision of services and products with you;
- assess your agricultural growing capacity and satisfaction of contracts ability;
- to provide access to the Grower Portal;
- to keep your contact details up to date;
- to respond to a query, complaint or issue raised by you;
- to comply with any law or determination by a court or regulator or authority; and
- to satisfy any Namoi Cotton Group audit and accounting requirements.

If you are a service provider to the Namoi Cotton Group we use your information to manage our business relationship.

If you are a job applicant, the information we collect is used to assess your job application and suitability for employment at the Namoi Cotton Group.

It is important to note that you do not have to give the Namoi Cotton Group your personal information. However, if you elect not to provide personal information, the Namoi Cotton Group may be unable to provide products and services, credit terms, process applications for employment, finalise payments required or otherwise do business with you or a related entity.

You have the option of dealing with the Namoi Cotton Group anonymously or by use of a pseudonym if practical to do so. If you elect to deal with the Namoi Cotton Group using a pseudonym we will not link this to your personal information.

The Namoi Cotton Group collects personal information to enable it to carry out its business specified above, to provide agricultural products and services and to communicate with its customers and service providers and investors. Such personal information collected will be shared between the Namoi Cotton Group's businesses, related companies and majority or equally owned joint ventures.

If the Namoi Cotton Group receives unsolicited personal information about you, which is not reasonably necessary for the provision of services, or to carry out business, prompt steps will be taken to destroy or de-identify that information within a reasonable practical time. Such obligations are subject to the law.

5. COOKIES AND IP ADDRESSES

In addition to any personal information you give to us via the Namoi Cotton Group Grower Portal or website, such as when you complete an online form, survey or submit other information or other documents. The Namoi Cotton Group may use cookies to capture certain data about your internet activity. If you do not want to use cookies, you can set up your browser to reject them. A "cookie" is a data file that will be stored on your computer or browser recording the way you use the Namoi Cotton Group website. The information collected may include your server address, your domain name, the date and time you visited the Namoi Cotton Group website, the type of internet browser you used, the type of operating system used by you.

The Namoi Cotton Group does not use your IP address to personally identify you.

6. DIRECT MARKETING AND BUSINESS OFFERS AND OPTING OUT

The Namoi Cotton Group may send you direct marketing communications by (phone, email, sms, facebook, telephone call, fax, in person, website links):

- about cotton ginning, cotton, seed, cotton marketing, agricultural commodity products and services; and
- offers and promotions how to use a product and service.

You have consented to such direct marketing options.

You can ask us at any time to stop sending you direct marketing communications (opting out) by contacting the Privacy Officer on 07 4631 6103 or by email at bgarcha@namoicotton.com.au

7. DISCLOSURE OF PERSONAL INFORMATION

In circumstances where the Namoi Cotton Group discloses your personal information to third party service providers, the Namoi Cotton Group requires them to comply with the Privacy Act and Australian Privacy Principles.

The Namoi Cotton Group in providing products and services to you may disclose your personal information to third parties. The third parties which the Namoi Cotton Group may disclose your personal information to include:

- consultants and agents or contractors representing the Namoi Cotton Group such as auditors, corporate advisers, valuers;
- the Namoi Cotton Group financiers, credit reporting agencies and guarantors, sharefarmers under a split allocation;
- regulatory authorities when required by law;
- Monsanto under the end point royalty program (if applicable);
- Cotton Australia under the levy collection policy (if applicable) and as advised by Cotton Australia;
- Parties which the Namoi Cotton Group has outsourced services such as IT systems and administrators, payment processors, contractors, lawyers, marketing company for a Namoi Cotton Group survey, debt collectors, professional advisers, couriers and otherwise for purposes necessary as part of Namoi Cotton Group's business.

Otherwise, the Namoi Cotton Group may disclose your personal information to third parties if you authorise us to do so, your health or the safety of others is at risk, permitted under the Privacy Act to do so or the Namoi Cotton Group is authorised or required to do so under law.

8. SHAREHOLDING INFORMATION

Namoi Cotton Shareholders and Namoi Cotton Residual Stockholders information may also be personal information. The Namoi Cotton Group has an arrangement with Computershare Investor Services Pty Limited ABN 48 078 279 277 (Computershare) to collect, store, use and disclose the personal information of Namoi Cotton Shareholders and Namoi Cotton Residual Stockholders for corporate maintenance and obligations under the ASX Listing Rules.

As our share registry manager, Computershare is required to comply with the Corporations Act 2001 and ASX Listing Rules. For more information on how Computershare handles personal information, please refer to its "Personal Information Management Statement" which is available at www.computershare.com.au. If your security holding is sponsored by a broker Computershare will not be able to update your

personal information, in this case you will need to have your broker update the information with Computershare.

9. JOB APPLICATION INFORMATION

We will collect and use your personal information to assess your application for employment with the Namoi Cotton Group. Your application may not be able to be processed without the collection and use of such personal information. Such personal information may be used for background checks and criteria checks for the position you have applied for with the Namoi Cotton Group. The Namoi Cotton Group may retain the information to assess your suitability for employment in the future.

The Namoi Cotton Group may collect personal information for job applications from third parties and service providers and from publicly available sources such as media and social media by publicly available search tools.

Personal information collected may be disclosed to the Namoi Cotton Group employees, recruitment agencies appointed by you, or if compelled by law to do so to a third party.

10. INFORMATION OVERSEAS

The Namoi Cotton Group is not likely to send or disclose your personal information to overseas entities or recipients.

11. PERSONAL INFORMATION AND SECURITY

The Namoi Cotton Group takes reasonable steps to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure.

Consideration must be continually given as to whom has access to this information, whether there are security mechanisms in place and how this information is protected from unauthorised access. The Namoi Cotton Group has security access systems for personal and confidential information for those who need the information for the purpose of carrying out their designated duties.

12. ACCESS AND CORRECTION OF PERSONAL INFORMATION

The Namoi Cotton Group must give an individual reasonable access to personal information it holds about that individual. You can access your personal information by standard formats, such as statements. You may also access your personal information by the Grower Portal.

The Namoi Cotton Group may refuse to provide this personal information, if:

- providing access would have an unreasonable impact upon the privacy of other individuals or not comply with the law or the Namoi Cotton Group Rules;
- the information relates to existing or anticipated legal proceedings between the Namoi Cotton Group and the individual and the information would not be accessible by the process of discovery in those proceedings;

- providing access would reveal the intentions of the Namoi Cotton Group in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law; or
- providing access would be likely to prejudice an investigation of possible unlawful activity.

In addition, where providing access would reveal evaluative information generated with the Namoi Cotton Group in connection with commercially sensitive decision making process, the Namoi Cotton Group may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.

The Namoi Cotton Group may charge for providing access to personal information, such charges must be reasonable.

The Namoi Cotton Group must provide reasons to the individual for denial of access or a refusal to correct personal information.

If the personal information we hold about you is incorrect or incomplete, you may make a request to amend such personal information that the Namoi Cotton Group has in its record keeping.

You may request the Namoi Cotton Group to update your personal information by completing and lodging a Change of Details Request Form. If for a reason we do not update the personal information requested by you, it will be noted we have not agreed with your change.

We will not charge you for updating the personal information however we will ask to you to verify your identity prior to reviewing your request.

You can request details of your personal information the Namoi Cotton Group holds by emailing the Privacy Officer below or by writing to the address below. Importantly, the Namoi Cotton Group will need to verify your identity before giving you access to the requested personal information. The Namoi Cotton Group will respond to your request within a reasonable timeframe.

You can contact the Privacy Officer on 07 4631 6103 or by email bgarcha@namoicotton.com.au

13. PROCESS FOR MAKING A COMPLAINT ABOUT BREACH OF PRIVACY

For further information regarding this Privacy Policy, or to make a complaint or raise any other concerns about your personal information or privacy, please contact the Namoi Cotton Group's Privacy Officer by calling 07 46316103 or by [email](#) or by post. The Namoi Cotton Group will investigate any complaints we receive. Contact details below:

Privacy Officer
Namoi Cotton Group

1b Kitchener St, Toowoomba QLD 4350

Telephone 07 46316103 EMAIL: bgarcha@namoicotton.com.au

If you are not satisfied with the result of your complaint by the Namoi Cotton Group, you can refer your complaint to the:

Office of the Australian Information Commissioner

Phone: 1300 363 992

Post: GPO Box 5218

Sydney

NSW 2001

Online form: www.oaic.gov.au (Privacy Complaint Form)

14. DOCUMENTATION

The Namoi Cotton Group has the right to amend this Privacy Policy at any time and the updated version will be placed on the Namoi Cotton Group's website. This document was last updated on 10 October 2017.