

# NAMOI COTTON GROUP PRIVACY POLICY

January 2023

www.namoicotton.com.au



#### 1. PURPOSE

Namoi Cotton Limited (ACN 76 010 485 588) and its related bodies corporate (collectively the **Namoi Cotton Group**) is committed to protecting the privacy of any personal information it holds about individuals in accordance with applicable laws, including the *Privacy Act 1988* (Cth).

This policy describes the way Namoi Cotton Group collects, holds and discloses personal information about individuals.

# 2. KINDS OF PERSONAL INFORMATION WE COLLECT

The kinds of personal information that Namoi Cotton Group collects and holds about you may include:

- identifying information, such as your name, date of birth, gender, passport and driver's licence;
- contact information, such as your postal address, email address and telephone number;
- social media handles and other social media profile information that you make available to us or to the public;
- information collected when acquiring Namoi Capital Stock or Namoi Grower Shares, such as tax file numbers, Australian Business Numbers and bank account details;
- names and locations of individual growers' properties, payment details, information used to assess any credit application;
- details of your occupation;
- details of any products and services we provide to you;
- records of our communications with you, including any messages you send to us;
- for job applicants, your identifying information (described above) and medical information and records; and
- information about you that is collected through individual surveys you may provide on-line or through customer representatives.

# 3. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information about you in the following ways:

- when you order products or services from us;
- when you submit a query or request to us;
- when you correspond with us (e.g. via email);
- when you respond to a survey that we run or complete forms in hard copy, through our website or over the phone with Namoi Cotton Group representatives;
- by tracking your use of our websites;
- from public sources;

Page	Document Title	Date Approved	Version #
2	NAM.PP.002 Privacy Policy	19.01.2023	2.0



- in the case of incidents, through CCTV footage, statements and medical consultants;
- when you apply for employment or finance with the Namoi Cotton Group;
- when you apply to do business under the Namoi Cotton Group's Australian Finance Services Licence;
- when you provide information via the Namoi Cotton Group Grower Portal;
- when you acquire or sell Namoi Capital Stock or Namoi Cotton Group Grower shares;
- from third parties who are entitled to disclose that information to us; and
- when you apply for a job with us.

We may collect "Government Related Identifiers", such as your 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.

In some cases, we may be required by law to collect certain types of personal information about you.

Where we collect personal information from you, we will generally do so directly ourselves. However, in some cases we may collect personal information from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

#### 4. USE OF PERSONAL INFORMATION

We collect information about you for the following purposes:

- to verify your identity when you are dealing with us;
- to manage our business relationship with you this includes providing you with information or services, improving our products and services and communicating with you;
- to promote and market current pricing, products and other products and services to you;
- to carry out market analysis and research;
- to monitor your use of our products and services;
- to assess, maintain, upgrade and improve our website, products and services;
- to carry out education and training programs for our staff;
- to respond to a query, complaint or issue raised by you;
- to comply with our legal and regulatory obligations, including the investigation of any complaints; and
- to satisfy any Namoi Cotton Group audit and accounting requirements.

If you are a grower, we also use your information to determine your eligibility for grower finance, to assess your agricultural growing capacity and satisfaction of contracts ability, and to provide you with access to the Grower Portal.

Page	Document Title	Date Approved	Version #
3	NAM.PP.002 Privacy Policy	19.01.2023	2.0



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

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

We may also collect and process your personal information for any other purposes that you have provided your consent for or if there is another lawful basis for doing so.

If we do not collect your personal information, it may affect our ability to perform these functions.

You can opt-out of receiving marketing communications from us by contacting our Privacy Officer on 07 4631 6100 or by email at <a href="mailto:coysec@namoicotton.com.au">coysec@namoicotton.com.au</a>.

#### 5. COOKIES AND HYPERLINKS

Our websites may use cookies. Cookies are small pieces of data stored on the web browser of your device. We may use these for site administration and analysis purposes and to deliver tailored content. You are able to configure your browser not to accept cookies (although this may limit website functionality).

Our websites contain links to third party websites. We are not responsible for the content of other websites or the privacy practices of the third parties who operate those sites.

#### DISCLOSURE OF PERSONAL INFORMATION

We may share personal information about you with:

- your representatives, advisers and others you have authorised to interact with us on your behalf;
- our staff who need the information to discharge their duties;
- related bodies corporate within our corporate group;
- our business partners, agents and service providers (including those service providers who assist in our marketing services);
- consultants and agents or contractors representing the Namoi Cotton Group such as auditors, corporate advisers, valuers;
- our financiers, credit reporting agencies and guarantors, sharefarmers under a split allocation;
- prospective purchasers of all or part of our business or of any shares in a Namoi Cotton Group entity;
- regulatory authorities who ask us to disclose that information, or to other people as required by law;
- Monsanto under the end point royalty program (if applicable); and
- Cotton Australia under the levy collection policy (if applicable) and as advised by Cotton Australia.

Page	Document Title	Date Approved	Version #
4	NAM.PP.002 Privacy Policy	19.01.2023	2.0



# 6. 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* (Cth) and the ASX Listing Rules. For more information on how Computershare handles personal information, please refer to its "Personal Information Management Statement" which is available at <a href="www.computershare.com.au">www.computershare.com.au</a>. 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.

#### 7. STORAGE AND SECURITY OF PERSONAL INFORMATION

We store personal information for as long as it is needed for the purposes which it was collected or as required by law. We generally store the personal information that we collect in electronic databases, some of which may be held by on our behalf by third party data storage providers. Sometimes we also keep hard copy records of this personal information in physical storage facilities.

We take reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. The Namoi Cotton Group has security systems for personal and confidential information that restricts access to those who need the information for the purpose of carrying out their designated duties.

# 8. ACCESS AND CORRECTION OF PERSONAL INFORMATION

If you want to access any of the personal information that we hold about you or to correct some aspect of it (e.g. because you think it is incomplete or incorrect), please contact us using the details below.

To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases, we may charge a fee for providing access to personal information, but we will inform you of this before proceeding. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

# 9. COMPLAINTS

If you are concerned about the way in which we are managing your personal information and think we may have breached the Australian Privacy Principles, or any other relevant privacy- related obligation, please contact the Namoi Cotton Group's Privacy Officer using the contact details set out below. We will deal with the matter within a reasonable time, and will keep you informed of the progress of our investigation.

Page	Document Title	Date Approved	Version #
5	NAM.PP.002 Privacy Policy	19.01.2023	2.0



If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns. You are also entitled to make a complaint to the Office of the Australian Information Commissioner. Contact details are available at the OAIC's website: <a href="https://www.oaic.gov.au">www.oaic.gov.au</a>.

# **10. CHANGES**

We may make changes from this policy from time to time. The latest version of this policy will always be available on our website.

# **11. CONTACT DETAILS**

If you need to contact us or want any further information from us on privacy matters, please contact our Privacy Officer at:

Privacy Officer Namoi Cotton Group PO Box 1333 Toowoomba Qld 4350 Australia

Telephone: 07 4631 6100

Email: <a href="mailto:coysec@namoicotton.com.au">coysec@namoicotton.com.au</a>

Page	Document Title	Date Approved	Version #
6	NAM.PP.002 Privacy Policy	19.01.2023	2.0