



Privacy Policy

This Privacy Policy explains how The Arnott's Group uses the personal data we collect from you when you:

- make a consumer related enquiry or complaint (including via letters, telephone calls, text messages and emails to our Consumer Experience Centre);
- enter into our competitions and promotions;
- complete our surveys;
- sign up to our newsletters;
- sign up to join our online communities;
- complete registration processes when you purchase a product;
- transact with us; and
- use our website.

The Arnott's Group includes the entities listed in Section 13. A reference to "our Company" in this Privacy Policy is a reference to each of these entities.

By providing your personal data to us, you acknowledge that we will collect, hold, store, use, disclose and otherwise handle your personal data in accordance with this Privacy Policy.

This Privacy Policy applies subject to the country specific terms set out in the Annexures which will take precedence to the extent of any inconsistency.

1. What data do we collect?

Our Company collects the following data:

- Personal identification and contact information, including your name, date of birth, gender, email address, phone number, address and other contact details.
- Information relevant for promotions and competitions.
- Transaction details, if you make a purchase with us or choose to store details in your online profile.
- Information we require to facilitate or improve our transactions and dealings with you.
- Information that helps us to improve our products and develop new products.
- A record of any enquiries you make.

- If you make a consumer related enquiry or complaint to us, health and other sensitive personal data if needed in connection with your enquiry or complaint.

2. How do we collect your data?

You directly provide our Company with most of the data we collect. We collect data and process data when you:

- Contact us, including when you make a consumer related enquiry or complaint to our Consumer Experience Centre via our website, email or telephone, and in subsequent communications with the Consumer Experience Centre.
- Enter our competitions and promotions.
- Voluntarily complete a customer survey or provide feedback via our website, any of our social media pages or email.
- Use or view our website, via your browser's cookies.
- Use or view our social media pages or use our apps.
- Sign up to our branded newsletters.
- Sign up to join our online communities.

We will always seek your consent to collect any personal data about you.

Our Company may also receive your data indirectly from the following sources:

- Our agents and contractors in connection with any of our competitions or promotions.
- Our customers if you contact them and we reasonably believe you have authorised them to refer your inquiry to us.
- Third parties if it is not reasonable or practicable to collect the data from you.

3. How will we use your data?

Our Company collects your personal data for the purposes of our business and activities, and in our efforts to improve and grow our business. More specifically, the purposes for which we collect your personal data, and the legal basis for processing your personal data under European Union and United Kingdom data protection laws, is set out below:

Purpose	Legal Basis
Confirm your identity.	This is in our legitimate interest, for example, to ensure we have confirmed the identity of the person making a request to us. We also process this personal data where necessary for us to comply with a legal obligation that we are subject to.
Provide products and services to you.	This is in our legitimate interest in order for us to provide products and services to you. In addition, where we have a contract with you, it may be necessary for us to process your personal data in order for us to perform that contract with you.

Deal with your consumer related enquiry or complaint.	This is in our legitimate interest in order to respond to your enquiry or complaint.
Administer and manage promotions and competitions.	This is in our legitimate interest in order to manage and administer our promotions and competitions. In addition, where we have a contract with you regarding the promotion or competition, it may be necessary for us to process your personal data in order for us to perform that contract with you.
Conduct marketing activities as described in Section 7.	We process your personal data in order to send you marketing materials. Where required under applicable data protection laws, this will be on the basis of your consent.
Obtain your feedback on our products and services and conduct consumer research.	This is in our legitimate interests in order to conduct research and obtain feedback to improve our products and services.
Conduct a business or professional relationship we have with you.	This is in our legitimate interests in order to manage and conduct our relationships with third parties in a business or professional capacity.
Personalise and enhance your online experience.	This is in our legitimate interests in order to improve our website and online experience for our customers and visitors.

Sometimes we extract information from our collected records to produce aggregated data. This aggregated data does not identify individuals. We use the aggregated data for research and product development and may share the data with third parties in connection with those purposes.

You are not required to provide any personal data to us. If you do not, or you inform us that you do not want us to use your personal data to contact you, we may not be able to deal with you effectively for the above or other purposes.

4. How will we disclose your data?

Our Company may disclose your data in the following ways:

- If you consent, our Company will share your data with our partner companies so that they may offer you their products and services.
- We may provide your data to third parties that we engage to perform functions on our behalf, such as processing credit card information, mailing information or prizes, data analysis, research, and advertising.
- In certain circumstances, we may disclose your personal data where required or authorised to do so by law, including in emergency situations, for health and safety reasons, and to assist law enforcement agencies.

- If you purchase a product, we may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

5. How do we store your data?

Our Company uses various systems and services to safeguard the personal data we store, as part of our business systems and processes.

Our Company securely stores your data both at an onsite secure server and offsite using trusted third party storage providers. Our staff are required to sign in and use multi-factor password when accessing our secure systems. We provide training for relevant staff to ensure that they are aware of our privacy commitments and our obligations in relation to the collection, use and disclosure of personal data.

Our Company will keep your personal data for as long as it is required for the purposes for which it was collected, or longer if required by applicable laws. Once your personal data is no longer required, we will de-identify or delete your data in our systems, or ensure we are no longer able to access and use it.

6. Cross border transfer of personal data

Our Company's systems and services may involve other entities within The Arnott's Group and third party service providers located outside the country in which our Company is located.

Your personal data may be held and processed outside the country in which our Company is located by other entities within The Arnott's Group and our service providers. The Arnott's Group entities and our service providers are based in various countries, including Australia, New Zealand, Japan, Hong Kong, Malaysia, Indonesia, Singapore, Taiwan, India, the United Kingdom and United States.

When we transfer personal data to others or outside the country in which our Company is located, we will comply with applicable privacy and data protection laws and will take steps to ensure it is treated in the same way that we would treat it. If you are located in the European Union ("EU"), European Economic Area ("EEA") or the United Kingdom ("UK"), your personal data may be transferred outside of the jurisdiction in which you are located. We may transfer your personal data to jurisdictions that are deemed as adequate for the purposes of EU/EEA and UK data protection laws and, where that is not the case, we will ensure appropriate safeguards are in place under EU/EEA and UK data protection laws, such as standard contractual clauses. For more information or to obtain a copy of the standard contractual clauses that we use, please contact us using details in Section 11.

7. Marketing

Our Company would like to send you information about our products and services that we think you might like. This may include updates on special offers, events and rewards, and other communications through our newsletters, online communities and/or loyalty clubs.

We will only do so if you have consented to receive marketing from us. If you have consented to receive marketing from us, you may always opt out at a later date. If we send a marketing offer directly to you, we will provide a way for you to opt out of future marketing offers.

You have the right at any time to stop our Company from contacting you for marketing purposes or giving your data to other members of The Arnott's Group.

If you no longer wish to be contacted for marketing purposes, please contact us using the details in Section 11. You can also follow the instructions to unsubscribe or opt out that we include in every electronic marketing communication.

8. What are your data protection rights?

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following rights under this Privacy Policy (which may exceed your rights under applicable law):

- **Access** – You can ask us to confirm whether we hold personal data about you. You have the right to request our Company for copies of your personal data. We will handle and respond to your request in accordance with applicable privacy laws, including if we are unable to provide you with the access you request. We do not impose any charge for a request for access, but where permitted under applicable data protection laws, we may charge you a reasonable fee for our costs associated with retrieval and providing you with access.
- **Rectification** – You have the right to request that our Company correct any information you believe is inaccurate. You also have the right to request our Company to complete information you believe is incomplete. You should contact us if you believe that any of the personal data we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, and provide us with a statement of the correction that you seek.
- **Erasure** – You have the right to request that our Company erase your personal data, under certain conditions.
- **Restrict processing** – You have the right to request that our Company restrict the processing of your personal data, under certain conditions.
- **Object to processing** – You have the right to object to our Company's processing of your personal data, under certain conditions. For example, you have the right to object to our processing of your personal data on the basis of our legitimate interests, under certain conditions. You also have the right to object to our processing of your personal data for direct marketing purposes as set out in Section 7 above.
- **Data portability** – You have the right to request that our Company transfer the data that we have collected to another organisation, or directly to you, under certain conditions.
- **Withdrawal of consent** – If we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time.

If you make a request, we will use reasonable endeavours to respond to you within a month (or any shorter period required by applicable law), and we will inform you if we need longer to respond to you. If you would like to exercise any of these rights, please contact us using the details in Section 11.

9. Cookies

Our Company uses cookies which are a small piece of information or file that is placed on your computer or device by websites or apps to collect standard Internet log information and visitor behaviour information for record-keeping purposes and to enhance functionality on the website or app.

For more information regarding our use of cookies, please see our ***Cookies Policy***.

10. Privacy policies of other websites

Our Company websites contain links to other websites. Our Privacy Policy applies only to our websites, so if you click on a link to another website, you should read their Privacy Policy.

11. How to contact us

If you have any questions about this Privacy Policy, the personal data we hold about you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us using the details below:

Email us at: Privacy@arnotts.com

Call us:

- Australia: 1800 24 24 92 or 1800 66 33 66
- New Zealand: 0800 88 19 66
- Hong Kong: +852 2811 3806
- Indonesia: 0 800 1 80 8000
- Japan: 0120 801639
- Malaysia: +60 3 7787 6288
- Singapore: +65 6273 0889

Or write to us at:

Attention: Privacy Officer

24 George Street, North Strathfield NSW 2137, Australia

12. How to contact the appropriate authority

You can also contact us to report any misuse of your personal data or if you wish to make a complaint about how we use your personal data (including in relation to any breach of applicable privacy and data protection laws). We aim to deal with any complaints under this Privacy Policy promptly.

We will inform you of any applicable dispute resolution avenues that you may pursue if you are not satisfied with our response. Should you wish to report a complaint or if you feel that our Company has not addressed your concern in a satisfactory manner, you have the right to contact the relevant authority in your country. These include:

<p>Australia: Office of the Australian Information Commissioner <u>Website:</u> https://www.oaic.gov.au/ <u>Phone:</u> 1300 363 992 <u>Email:</u> enquiries@oaic.gov.au</p>	<p>Hong Kong: Office of the Privacy Commissioner for Personal Data <u>Website:</u> https://www.pcpd.org.hk/ <u>Phone:</u> 2827 2827 <u>Email:</u> complaints@pcpd.org.hk</p>
<p>Japan: Personal Information Protection Commission, Japan <u>Website:</u> https://www.ppc.go.jp/en/ <u>Phone:</u> 03 6457 9680</p>	<p>Malaysia: Personal Data Protection Department <u>Phone:</u> 03 8000 8000 <u>Email:</u> aduan@pdp.gov.my</p>
<p>New Zealand: New Zealand Office of the Privacy Commissioner <u>Website:</u> https://privacy.org.nz/ <u>Phone:</u> 0800 803 909 <u>Email:</u> enquiries@privacy.org.nz</p>	<p>United Kingdom: Information Commissioner's Office <u>Website:</u> https://ico.org.uk/ <u>Phone:</u> 0303 123 1113 <u>Address:</u> Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF</p>
<p>EU: If you are located in the EU, you may contact the data protection authority in your jurisdiction. A list of contact details for EU data protection authorities is available at https://edpb.europa.eu/about-edpb/about-edpb/members_en</p>	

13. The Arnott's Group entities

The Arnott's Group includes the following entities. If you are located in one of the jurisdictions below, the entity/entities listed are the data controller in respect of your personal data unless otherwise indicated:

<p>Australia:</p> <ul style="list-style-type: none"> • Arnott's Biscuits Ltd (ABN 44 008 435 729) • Campbell Australasia Pty Ltd (ABN 28 004 456 937) • Good Food Partners Pty Ltd (ABN 38 104 048 400) 	<p>Hong Kong:</p> <ul style="list-style-type: none"> • Campbell Foods HK Ltd
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<p>Indonesia:</p> <ul style="list-style-type: none"> • PT Arnott's Indonesia 	<p>Japan:</p> <ul style="list-style-type: none"> • Campbell Japan Inc
<p>Malaysia:</p> <ul style="list-style-type: none"> • Campbell Cheong Chan (Malaysia) Sdn Bhd • Campbell Soup Southeast Asia Sdn Bhd 	<p>New Zealand:</p> <ul style="list-style-type: none"> • Arnott's New Zealand Ltd • 180 Degrees Ltd
<p>United Kingdom:</p> <ul style="list-style-type: none"> • Campbell Foods UK Ltd (data controller: Arnott's Biscuits Ltd (ABN 44 008 435 729) (Australian company)) 	

All entities in The Arnott's Group can be contacted using the details in Section 11.

14. Changes to our Privacy Policy

Our Company keeps this Privacy Policy under regular review and places any updates on this website. If we have your email address, we will notify you via email of any significant changes to this Privacy Policy.

This Privacy Policy was last updated in December 2022.

Appendix 1: Indonesia

If you reside or otherwise find yourself in the Republic of Indonesia territory, we are committed to respecting your rights as a data subject under the prevailing laws of Republic of Indonesia. This Privacy Policy serves as an agreement with you on the collection and processing of your personal data.

For all personal data that we have about you, please note the following:

Accuracy of Personal Data: You warrant that all personal data that you have provided or will provide to us is true and accurate.

Data Breach Notification: If there is any failure to protect the confidentiality of your personal data, you agree that the breach notification can be sent electronically by us.

Language Requirement: This Privacy Policy is written in both the English Language and in the Indonesian language. Both texts are equally original. In case of any inconsistency or different interpretation between both texts, the Indonesian language shall be deemed to be automatically amended to conform with and to make it consistent with the relevant English text.

Data Retention: If you reside in Indonesia, we will keep your personal data for as long as required by the applicable laws. You agree that we will delete your personal data from our system when we deem that your personal data is no longer relevant to us, which can be evidenced by your decision to withdraw your consent to our processing of your personal data.

Appendix 2: Hong Kong

For Hong Kong data subjects, Section 7 of the Privacy Policy shall be replaced with the following:

Our Company intends to use your personal identification and contact information to send you information about our food and merchandise products and related services that we think you might like. This may include updates on special offers, events and rewards, and other communications through our newsletters, online communities and/or loyalty clubs.

We may only do so if you have consented to receive marketing from us. If you have consented to receive marketing from us, you may always opt out at a later date. If we send a marketing offer directly to you, we will provide a way for you to opt out of future marketing offers.

Our Company also intends to share your personal identification and contact information with our service providers and other members of The Arnott's Group, so that they may supply or offer the same or similar type of products and services to you. We may only do so if you have provided written consent to us.

You have the right at any time to stop our Company from contacting you for marketing purposes or giving your data to other members of The Arnott's Group.

If you no longer wish to be contacted for marketing purposes, please contact us using the details in Section 11. You can also follow the instructions to unsubscribe or opt out that we include in every electronic marketing communication.

Appendix 3: Japan

For Japanese data subjects the following additional terms apply.

Our Company website in Japan is operated by Campbell Japan Inc (address: 10th Floor, 5-8-14 Hiroo, Shibuya-ku, Tokyo 150-0012, representative: Lim Mooi Cheng).

1. Personal Information Protection Desk

If you have any comments or complaints regarding the handling of your personal data, please contact us at Campbell Japan Inc toll-free number (0120-801639). We will strive to take appropriate and prompt action.

2. Cross border transfer of personal data

Our Company may provide your personal data to other entities within The Arnott's Group and third party service providers located outside the country in which our Company is located, as described in Section 6 of the Privacy Policy. The entities handle the personal data in accordance with the Privacy Policy and internal policies.

The information of the current country-specific data protection systems of those countries is as shown below.

In order to select an appropriate entity for entrustment, we may entrust personal data to a foreign trustee other than those listed in Section 6, although the trustee and its country have not been identified at this time. In such cases, we may start entrustment to a new trustee without obtaining your consent again.

- Name of the foreign country to which the personal data may be transferred: Australia, New Zealand, Hong Kong, Malaysia, Indonesia, Singapore, Taiwan, India, the United Kingdom and United States.
- Outline of country-specific data protection system:

	EU Adequacy Decision	Enrolment in CBPR system	Fulfilment of OECD's Eight Principles
Australia	x	✓	✓
New Zealand	✓	x	✓
Hong Kong	x	x	✓
Malaysia	x	x	No provisions regarding Accountability Principle
Indonesia	x	x	No provisions regarding Use Limitation Principle and Accountability Principle
Singapore	x	✓	No provisions regarding Security Safeguards

			Principle and Accountability Principle
Taiwan	✗	✓	No provisions regarding Accountability Principle
India	✗	✗	Mostly only for sensitive data
United States	✗	✓	✗

Note: Information for United Kingdom is excluded because UK's data protection system is certified to be at the same level as that of Japan in protecting the rights and interests of individuals.

- For further information of the outline of data protection system in these countries, click and see https://www.ppc.go.jp/files/pdf/offshore_DPA_report_R3_12.pdf (from Personal Information Protection Commission's website, Japanese).
- The Company will ensure that third party service providers located outside the country from which personal data is transferred are contractually required to implement measures to protect the personal data received from the Company in accordance with applicable laws and the Privacy Policy.

Appendix 4: New Zealand

For New Zealand based data subjects, in respect of the rectification rights in section 8 of the Privacy Policy you have a right to provide our Company with a statement of correction. If our Company chooses not to make a correction that you have requested and you have provided us with a statement of correction, we will take reasonable steps to ensure that the statement of correction is attached to the information in a manner that ensures that it will always be read with your information.