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# PRIVACY POLICY

We, Spreading Northland Limited take our obligations regarding personal information seriously.

*Personal information* is information about an individual who can be identified.

We have adopted this Privacy Policy to enable us to collect, store and use personal information we hold about our prospective, current and former customers, shareholders, employees, contractors, suppliers and others, in accordance with relevant laws, including the Privacy Act 1993 up to 30 November 2020 and the Privacy Act 2020 from 1 December 2020 (in each case, the Act).

As someone who deals with us and provides us with personal information, you agree to be bound by this policy.

## 1. What information do we collect, and how?

### **The information we collect**

In order to provide products and services to the best of our ability, we collect a range of information from different people. We may collect and hold personal information about:

- current, prospective and former customers and shareholders
- suppliers (and their employees and contractors)
- current and prospective Spreading Northland employees and contractors
- other people who deal with us from time to time.

### ***Customers/shareholders***

If you are a current or prospective customer and/or shareholder of Spreading Northland, we may collect:

- identifying information about you, such as your name, address and contact details
- payment details and other financial information
- information you provide to help us assist you with any application process, including a credit application and/or application to become a shareholder
- information captured on your property, including information relating to mapping, nutrient management and soil, plant, feed and water testing
- reports generated from that information captured on your property
- information about your property obtained from other third parties helping to provide services to you, such as spreading businesses
- information about your transactions with Spreading Northland, including for the purpose of determining any rebates, other distributions or bonus issues
- other information relating to your use of our products and services.

### ***Employees/contractors/suppliers***

If you are a current or prospective Spreading Northland employee, contractor or supplier, we may collect:

- information about your occupation, educational qualifications, employment history and suitability for the role or relationship, including information provided during an employment application (such as your criminal history)
- employees' banking, tax and superannuation details
- name and details of emergency contacts
- contact details and any personal information provided when you commence a business or service relationship with us
- surveillance footage (for safety and security purposes)
- information about your performance in the role or relationship, including results of drug testing (if applicable).

### ***Other***

We may collect other personal information from time to time. We will only collect information where needed for us to deliver our products or services or where required by law.

The personal information that we collect from you is held in accordance with the Act (in particular, the Privacy Principles contained in the Act).

Providing the above information is generally optional for you. However, if you do not provide information to us when requested, we may not be able to provide products and services to you or the service you receive may not be as appropriate or relevant as it could be.

### **How we collect your information**

We may collect the personal information you provide us in a variety of ways. We will generally collect personal information from you directly, including through the following means:

- when you first apply to become a customer, shareholder or employee, or otherwise commence a business or service relationship with us or one of our joint venture companies
- while providing any of our products or services to you (or where our joint venture companies do so)
- from website registration or contact forms, shareholder applications and credit applications
- during your interactions and correspondence with us or with one of our joint venture companies
- when you use our website
- through surveillance devices that may be situated on our premises
- while conducting customer satisfaction and market research surveys
- through promotions.

We may also collect your personal information from third parties where you have authorised this, this is permitted by law, or where the information is publically available. This may include information from:

- a contractor or other third party helping to provide services to you, such as spreading businesses
- suppliers of services to us (e.g. recruitment firms).

We may store the above information for possible future communications.

If you have provided us with information about another person, you must have that person's permission to do so. As part of this you need to comply with your obligations under the Act. For example, you may need to tell that other person that you have done so, that they have a right to

access their information and that we will handle their personal information in accordance with this policy.

## **2. How do we use your information?**

We may use the personal information we collect from you for a number of purposes connected with our business. These include the following.

### ***General***

In general we may use your personal information:

- to verify your identity and application details
- to supply or provide you with any products or services you have requested
- to administer your account (including credit checks, processing, administering and collecting payments from or making payments to you)
- to interact and communicate with you
- to engage third parties on your behalf (where authorised)
- to deal with your requests, enquiries or complaints and other customer care or business related activities
- to improve our products and services
- to contact you about our products or other initiatives we think you might be interested in
- for marketing, publicity or market research that we might undertake
- to comply with our legal obligations, including our reporting obligations
- for other purposes for which you have given permission or which is allowed by law.

### ***Customers/shareholders***

If you are a current or prospective customer we may use your personal information:

- to verify your linking with a property or group of properties
- to assist you to apply to be a customer and/or creditor
- to assess your requirements and how we can best provide products and services to you
- to provide you with, or facilitate the provision of, products or services, including property inputs
- to maintain and administer our records
- as otherwise required or allowed by law.

### ***Employees/contractors/suppliers***

If you are a current or prospective employee, contractor or supplier, we may use your personal information:

- to assess your suitability or performance
- to manage and meet obligations in relation to our employees and contractors
- to purchase products or services
- to perform drug and alcohol searching and testing, in accordance with our relevant policies.

### ***Other***

We may use surveillance footage, if required, for detecting and deterring inappropriate or criminal behaviour at our premises, and monitoring the safety and security of our customers, suppliers, staff and property.

We may also use your information in an anonymised aggregated form, to carry out analysis of our products, services and customer interactions.

### **3. Disclosure of your information**

We want you to know that any information you supply to us may be shared with and used by the following, where relevant to them:

- our employees, contractors, suppliers and agents
- affiliated and related companies
- other third parties who help provide products and services
- our advisors
- a business that supports our services and products (e.g. a business that hosts or maintains our IT system, data centre or website)
- credit risk assessment agencies and debt collection agencies
- any court, tribunal or regulatory authority where disclosure is required or allowed by law
- any other person authorised by you or by law.

We will not share your information with third parties, except as outlined in this policy, or where you have authorised that disclosure. In particular, except as required by law, we will not share your information with local government agencies or authorities or industry groups without your prior written consent. We will never sell your information to third parties.

Your information may be hosted with a third party service provider. Our agreements with them prohibit the information that we collect from you being used by them in a way that we have not authorised.

We may from time to time transfer personal information to third parties outlined above who are located outside New Zealand. If we do so, we will ensure your personal information will be protected by comparable safeguards to those in New Zealand law. If your personal information will not be protected by comparable safeguards to those in New Zealand law, we will tell you that this is the case, and only transfer your personal information with your consent.

### **4. Storage and protection of your information**

We may record and store personal information we collect from you. We take reasonable steps to ensure that your personal information is stored securely and is protected from misuse, loss and unauthorised access, modification or disclosure (including through the use of firewalls, secure passwords and login processes).

We cannot promise that your personal information will be completely free from access by an unauthorised person (e.g. a hacker). However, we use reasonable safeguards to minimise the risk of this occurring.

If a privacy breach occurs which has caused or may cause serious harm to you, we will notify you of this as soon as practicable either directly or, if that is not reasonably practicable, by public notice.

We may store your personal information using a third party service provider (including providers outside New Zealand) and so your personal information may be held outside New Zealand. These providers are specialists in the areas of data storage and protection and are therefore well-placed to maintain systems that protect your information.

We keep personal information only for as long as it is needed and will take reasonable steps to securely destroy or delete personal information where it is no longer required. Personal information may continue to be stored in a backup computer system and we may be required by law to retain certain personal information.

## **5. Your right to access and correct your information**

We take reasonable steps to keep your personal information accurate, complete and up-to-date.

Aside from some circumstances set out in the Act, you have a right to access and correct the personal information we hold about you. To do so, please mail or email our Privacy Officer at the following address or email address:

Spreading Northland Ltd  
14 Day Street  
Dargaville 0310

Email: [jhwilliamson@xtra.co.nz](mailto:jhwilliamson@xtra.co.nz)

In some cases, there may be a charge associated with providing copies of your personal information to you. If so, we will let you know before sending your information to you.

## **6. Internet use and cookies**

### ***Cookies***

A cookie is a small file that resides on your computer and can be used by a website to remember things like your preferences for that site. For example, a cookie can be used to store registration information so that you do not need to re-enter that information on a subsequent visit to the site. We may send cookies to your computer while you are accessing our website.

We do not use cookies to collect any personal information about you, although we may collect non-attributed (anonymous) information regarding your use of our website.

Some web browsers enable you to decline the receipt of cookies. If you use this function you will still be able to visit our website but some pages may not fully function and you may not be able to access certain information on the website.

### ***Statistical information and analytics***

To improve our website and products and services, we may collect statistical information about your visit and use patterns and other meaningful information gathered from website analytics tools. This information is aggregated and doesn't identify you personally.

In addition, we may use third party cookies from third party services such as Google Analytics and/or Microsoft Application Insights. These services give us insight into behavioural information

relating to users' interests in our services, on an anonymous and aggregate level. This helps us to understand browsing behaviour to give a better experience while using our services.

You can access Google's Privacy Policy <https://policies.google.com/privacy?hl=en-US> and Microsoft's Privacy Policy <https://privacy.microsoft.com/en-ca/privacystatement>.

### ***Links to third party sites***

This Privacy Policy only relates to our website and services. Our site may contain links to other third party sites. We are not responsible for the privacy practices or the content of other websites. You should check their privacy policies before providing personal information to them or any other third party.

## **7. Changes to our Privacy Policy**

We may change this policy at any time and notify you by posting an updated version of the policy on our website. Any change applies from the date we post it on our website.