

Privacy and Data Protection policy

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1.0 Purpose

The Privacy and Data Protection policy explains how Hastings Co-op collects, stores, uses, discloses and manages your personal information.

By providing personal information to us, you consent to our collection, use, storage, disclosure and management of your personal information in accordance with the Privacy Act 1988 (Cth) ("Privacy Act") and this policy.

2.0 Scope

This policy applies to all personal information collected, stored, used, or disclosed by Hastings Co-operative Limited (the Co-op) in the course of its operations.

It covers the personal information of the following groups:

- **Members:** Individuals who hold membership in the Co-op and whose personal information is collected and maintained as part of membership records.
- **Customers:** Individuals who interact with the Co-op through purchasing products, using services, or participating in loyalty programs.
- **Employees:** Current and former employees, job applicants, and volunteers whose personal information is collected as part of employment and HR processes.
- **Contractors and Service Providers:** Individuals or entities engaged to perform services or supply goods to the Co-op.
- **Visitors and Guests:** Individuals who visit Co-op premises, including those captured on CCTV systems.

- **Website and Online Users:** Individuals who access or interact with the Co-op's websites, mobile applications, or digital platforms.
- **Third-Party Contacts:** Individuals whose personal information is provided to us by third parties (e.g., for business, marketing, or legal purposes).

This policy outlines how the Co-op collects, uses, stores, and discloses personal information from these groups and how individuals can manage their privacy preferences.

3.0 Personal information we collect

The types of personal information Hastings Co-op collects about you depends on the nature of your interactions with us.

We may collect the following types of personal information:

- information to verify your identity including your name, date of birth, gender, address, email address and telephone number;
- financial information including bank accounts, credit card details, your income and credit worthiness;
- details of your employment history, and other information provided as part of our recruitment process;
- your preference of our products, services, facilities and lifestyle activities;
- information about you and your family and any characteristics, preferences or requirements that are relevant to the products and services that we may provide to you;
- your image and/or voice and other personal information (such as your car licence plate) collected via CCTV surveillance systems installed in our workplaces and premises;
- your device ID, device type, geo-location information, IP address, browsing information and any personal information that you may provide to us directly or indirectly via our websites, mobile applications or other digital media; and
- any other personal information that may be required in order to facilitate your dealings with us.

4.0 Collection of sensitive information

In some cases we may also collect sensitive information, for example if you are involved in an accident, we may collect medical information and incident reports.

CCTV footage may contain sensitive information, and as such its use and release is governed by additional policies. This is covered in more detail in the section dealing with access to personal information.

5.0 How we collect personal information

We will generally collect personal information from you:

- directly, when you communicate with us;
- indirectly, anytime you communicate or interact with us, whether by phone, email, face to face meeting, online or social media interaction;
- when you use our websites or applications;
- through your participation in our surveys, competitions, membership or loyalty programs or promotions;
- when you visit our workplaces, retail outlets or car parks through our CCTV systems; and
- through our recruitment process when you apply for a position with us.

We may also collect your personal information from third parties such as:

- marketing agencies, data collection and research organisations;
- medical professionals (for example if you are involved in an accident);
- credit reporting bodies, law enforcement and government entities; and
- other individuals (for example employment references).

6.0 If you do not wish to provide us with personal information

You are not required to provide personal information to us. If you wish to deal with us anonymously or you decide not to provide us with the personal information described above, we may not be able to provide or tailor our products, services or information to you, either to the same standard or at all (for example certain functions of our website may not function properly if you disable cookies).

7.0 Why we collect, store, use and disclose personal information

We may collect, hold, use and disclose your personal information for the following purposes:

- to provide and market our products and services;
- to communicate with you;
- to do business with you;
- for the general management and conduct of our business;
- to comply with our legal obligations;
- to investigate incidents (including potential incidents) which occur on or at our premises;
- to consider the suitability of prospective employees;
- for security and risk management purposes; and
- to help us manage, develop and enhance our services, including our websites and applications.

We will not use or disclose your personal information for any purpose other than the purpose for which it was collected (or a related purpose) unless you have consented to that purpose or we are permitted to do so by law.

8.0 Disclosing your personal information

We may disclose your personal information (including in some circumstances, your sensitive information) for the purposes for which it was collected or related purposes (as described above) to:

- Operational third parties for example financial institutions, IT and cloud hosting providers, loyalty program partners, insurers, auditors and contracted service providers who assist us in operating our business.
- regulatory authorities, police or government agencies or bodies where required by law.

9.0 Social Media and Public Communications

We maintain an active presence on social media platforms (such as Facebook, and Instagram) to share news, promote community initiatives, and engage with members and customers. We do not post or disclose any personal or sensitive information about individuals on our social media channels without their prior consent.

The types of information we may share include:

- General updates about Co-op activities, events, and services;
- Images of facilities, products, or community events where individuals are not identifiable; and
- Photographs or stories featuring individuals only where **explicit consent** has been provided.

If you wish to have an image or post removed from our social media channels, please contact our head office at marketing@hastingscoop.com.au

10.0 CCTV at Hastings Co-op sites

We use CCTV surveillance systems to monitor and record activities at Hastings Co-op properties and premises (including our workplaces). The main purpose is to maintain a safe and secure environment for our employees, customers and visitors to our premises. This means we may use your personal information gathered from CCTV for security and risk management, loss prevention, incident investigation purposes and other purposes set out in this policy, or as permitted by the law.

We also use the data collected from our CCTV surveillance systems to maintain or improve our properties, premises and services, we may do this by:

- collecting and analysing customer behaviour;
- monitoring patterns of foot traffic; and
- analysing customer demographics.

When used for these purposes the data is aggregated anonymously. We do not identify individuals for these uses. We securely discard the data collected from our CCTV surveillance systems when it is no longer required for business or legal purposes.

11.0 Use of External Systems for Direct Marketing

Hastings Co-op may use external service providers, such as MailChimp, to manage and send direct marketing communications. These third-party platforms may store personal information on servers located outside Australia.

We take reasonable steps to ensure that these providers comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) and have adequate safeguards in place to protect your personal information.

By providing your contact details, you consent to the use of your information for direct marketing via such external systems. You may opt out of receiving marketing communications at any time by following the unsubscribe link in the communication or by contacting our Privacy Officer.

12.0 Handling of Employee Personal Information

Hastings Co-op collects and uses personal information from employees as part of its employment and HR processes. This may include personal details, contact information, employment history, qualifications, payroll details, and other necessary data.

We collect this information to manage employment relationships, process payroll, administer benefits, and meet legal obligations.

Employee personal information is stored securely and accessed only by authorised personnel. We use secure HR systems to manage this data and take reasonable measures to protect it from unauthorised access or misuse. If an employee has any concerns regarding the handling of their personal information, they should contact the Privacy Officer.

13.0 Updates to the Privacy and Data Protection policy

We may update this policy from time to time to reflect changes in the law, technology, or our business practices. The most recent version of the policy will always be available on our website.

We encourage you to periodically review the policy to stay informed about how we protect your personal information.

14.0 Direct marketing communications

We and/or our third party service providers may send you direct marketing communications and information about:

- products, services, discounts, competitions and special promotions that we consider may be of interest to you;
- offers or promotions based on how you use our products and services.

These communications may be sent in various forms, including by telephone, post, email, SMS or any other form of electronic communication in accordance with the Privacy Act and the Spam Act 2003 (Cth).

By providing your contact details you consent to Hastings Co-op and/or third-party service providers we engage, sending you the direct marketing messages described above.

15.0 Cookies

Cookies are pieces of information that a website transfers to your device to store and sometimes track information about your use of the website. We use cookies to distinguish you from other users in order to better serve you when you revisit our website. You can set your browser to notify you when you receive cookies, providing you with the opportunity to either accept or reject it. You can also refuse all cookies by turning them off in your browser. However, if you do this, certain parts of our website may not function properly. We handle personal information collected by cookies in the same way that we handle all other personal information as described in this policy.

16.0 Security of Information

We may hold your personal information in either electronic or hard copy form. Where possible, personal information is stored on secure servers located in Australia. When data is stored or processed overseas by approved cloud service providers (such as Microsoft Azure, AWS, or Google Cloud), Hastings Co-op ensures those providers maintain security safeguards equivalent to Australian privacy requirements.

The confidentiality and security of your information is very important to us, and we take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to protect your personal information, including encryption at rest and in transit, multi-factor authentication, access controls, audit logging, and regular security reviews.

You should also be aware that email communications are not usually encrypted and should not be considered secure.

Where we no longer require your personal information for business or legal reasons, we will take reasonable steps to destroy or de-identify it.

Where required by applicable law, we will notify you, and the Office of the Australian Information Commissioner and/or other relevant regulatory authorities, of data breaches affecting your personal information.

17.0 Third party links

Our websites and mobile applications may contain links to websites owned and operated by other organisations. When you click on one of these links, you are moving to another website. We are not responsible for the privacy practices of, or any content on, those linked websites. We encourage you to read the privacy policies and other terms that apply to those websites as they may differ from this policy, and if you have any privacy concerns, we encourage you to contact those website providers directly.

18.0 Access, correction and deletion of personal information

You have a right under the Privacy Act 1988 to access and correct your personal information held by Hastings Co-op.

If you wish to seek access to, correct or delete your personal information that we hold about you, please contact our Privacy Officer. Requests will be acknowledged within 5 business days. Verification of identity will be required, for example through provision of government-issued identification or equivalent means.

Depending on the nature of your request, we may ask you to provide us further information in order to verify your identity and ask you to put in writing the information you require. Hastings Co-op will provide a written response within 30 calendar days, either granting access/updates or explaining the reasons for refusal in accordance with the Privacy Act.

There may be instances where we cannot grant you access to, or are not able to delete, the personal information we hold, for example, if a legal exception applies or where granting access would interfere with the privacy of others or result in a breach of confidentiality, or where we are required to retain or cannot delete the information for legal or regulatory compliance reasons. If that happens, we will give you written reasons for refusal (if permitted by law to do so).

In the case of requesting access to CCTV footage, we have a corporate procedure, developed to conform with the Privacy Act that governs our use and release of CCTV footage. It may also be the case that we are unable to release CCTV footage if there is an investigation or legal action pending.

If we disagree that there are grounds for amending your personal information, we will inform you of the reasons and add a note to the personal information stating that you disagree with it. We will not charge you for requesting access to, corrections or deletion of your personal information, however, we may recover reasonable expenses associated with providing you with access to your personal information.

19.0 Complaints and concerns about your privacy

If you have any questions about how we handle your personal information, or if you wish to make a complaint about our information handling practices, please contact our Privacy Officer.

Email: admin@hastingscoop.com.au
Post: Privacy Officer
Hastings Co-operative Corporate Centre
Level 1, 9-13 High Street
Wauchope NSW 2446

Our Privacy Officer will acknowledge receipt of your complaint within 5 business days. Once our investigation is complete, we will contact you (usually in writing) to advise the outcome within 30 calendar days. You will also be invited to respond to our findings. If your complaint cannot be resolved at this stage, it may be escalated to the CEO for further review. Hastings Co-op aims to resolve all complaints within 30 calendar days; however, if more time is required, we will provide you with an update and a revised timeframe.

If you consider that we have been unable to satisfactorily resolve your concerns about our handling of your personal information, you can contact the Office of the Australian Information Commissioner:

Email: enquiries@oaic.gov.au
Phone: 1300 363 992
Post: Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2000
Please visit the OAIC website at www.oaic.gov.au for further information.

20.0 Roles, responsibilities and delegations

Role	Responsibility
Board	Ensure that the Co-op's Privacy and Data Protection policy complies with the Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs), review and approve significant changes to the policy, oversee the Co-op's data protection and privacy compliance.
CEO	Implement privacy management strategies and policies approved by the Board, ensure that employees adhere to privacy practices and policies, report any significant privacy incidents to the Board.
Privacy Officer	Act as the main point of contact for privacy-related inquiries and complaints, monitor compliance with privacy laws and internal policies, investigate and manage data breaches, including notifications to affected individuals and regulatory authorities and maintain the Privacy and Data Protection policy and update it as required.
Managers and Supervisors (Leaders)	Ensure that their teams understand and comply with privacy procedures, facilitate training on privacy obligations for employees and report any potential breaches or concerns to the Privacy Officer.
Employee	Follow privacy policies and procedures when handling personal information, report any suspected data breaches or privacy concerns to their supervisor or the Privacy Officer and participate in privacy training as required.
IT and Data Management Team	Implement technical safeguards to protect personal data, monitor data systems for potential security breaches, support data management practices to ensure the secure storage and transmission of personal information.

21.0 Definitions

For the purposes of this policy and related policy documents, the following definitions apply:

Personal information has the meaning given to it in the Privacy Act and includes any information or opinion, whether true or not, about an identified individual or an individual who is reasonably identifiable.

Sensitive Information is a subset of personal information that includes information about an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, health information, genetic data, biometric data, sexual orientation, and criminal record. Handling of sensitive information is subject to higher standards under the Privacy Act.

Employee Personal Information refers to personal information collected in relation to the employment of an individual, including details such as employment history, payroll data, tax file numbers, and performance records.

Data Breach is an incident where personal information held by the Co-op is lost or subjected to unauthorized access, modification, disclosure, or misuse.

Direct Marketing is the practice of contacting individuals to promote products or services, often via email, SMS, phone calls, or other digital communication channels.

External Service Providers includes third-party companies or platforms, such as MailChimp, that process or store personal information on behalf of Hastings Co-op.

Privacy Officer is the designated individual responsible for managing the Co-op's privacy compliance and responding to privacy-related inquiries and incidents.

Data Subject is any individual whose personal information is collected, held, or processed by the Co-op.

Consent is a voluntary agreement by an individual to allow their personal information to be collected, used, or disclosed for specific purposes. Consent may be implied or explicit, depending on the context and legal requirements.

Australian Privacy Principles (APPs) are the principles outlined in the Privacy Act 1988 (Cth) that govern the handling of personal information by organizations.

22.0 Information

Title	Privacy and Data Protection policy
Category	Governance
Approval date	28 July 2026
Review date	28 July 2029, or as required due to business or legislation changes.
Policy advisor	Company Secretary
Approving authority	CEO

23.0 Related Policy Documents and Supporting Documents

Legislation	Privacy Act 1988 (Cth)
Policy	Not applicable
Procedures	Not applicable
Forms	Not applicable