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UNITED FOODSERVICE PRIVACY POLICY

United Foodservice is wholesaler of quality products including fresh and frozen foods, drygoods and paper products. Our brands support the HACCP Safety Program. We supply the finest ingredients to our trading partners to create a stronger relationship between our Company and yours.

We are typically a wholesale to merchant operation (B2B) from electronic ordering at your fingertips and provide logistics to your store or warehouse. As part of our systems, we are dedicated to the integrity of our customers' private and personal information and data and such United Foodservice has a duty and is committed to protecting your personal information.

This Policy outlines our obligations in managing personal information about our clients, potential clients, contractors and others. We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

Information we collect and hold

Information or an opinion about an identified individual, company, trust or entity, that is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

In general, the type of information we collect and hold includes (but is not limited to): names, birth dates, addresses, contact details, occupations, medical history and treatment, memberships and associations, financial and tax records, family situations and other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations.

Some personal information which we collect is 'sensitive information'. Sensitive information includes information about a person's racial or ethnic origin, political affiliation, religious affiliation, mental health, disability, trade union or other professional or trade association membership, sexual preferences and criminal record, and other health information

Personal information is generally collected and held about clients, associates and potential clients, suppliers and their employees, and prospective employees, employees and contractors.

Some of the functions may include:

- Online ordering;
- Complaints handling
- Managing employee records;
- Website operations;
- Sending out newsletters;
- Liaising with overseas entities
- Liaising with competitors
- Liaising with alternative and substitute wholesalers
- Sales and marketing management
- Financial and management accounting functions such as financial modelling and forecasting and budgeting

Our entity will link personal information across business processes in cases to advance the customer's interest or would expect it to do so, or only by consent if the information is sensitive.

Our entity will never sell information about individuals to anyone unless we have prior written consent by you. Our entity will only disclose information overseas.

Privacy Risk

Our entity implements a holistic approach to privacy and data protection risk management.

We liaise with the relevant third party consultants and prepare for assessments by a regulator such as the Office of the Australian Commissioner ("OAIC") or independent auditor.

If the cases requires, we will engage in assessing privacy compliance against local Australian regulations such as the *Privacy Act 1988* (Cth), as well as global regulations such as the European Union General Data Regulation ("EU GDPR"), China's cyber security law and any other regulation if required from time to time;

By implementing such steps and by educating employees, developing awareness strategies throughout our business. We minimise our risk from both governance and operational perspective. Statistics have shown that the greatest risk for data breach comes from internal staff. If required we may implement an organisational culture assessment to demonstrate where the weaknesses are in the entity that may arise from time to time so that we can proactively assess new risks which may emerge.

How we collect and hold on to Personal Information

We will generally collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards, telephone conversations and from third parties. We also collect personal information from our web site and the internet, through receiving subscription applications and emails. We also use third parties to analyse traffic at that web site, which may involve the use of cookies. Information collected through such analysis is anonymous.

In some circumstances we may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another person.

We hold personal information in secure and confidential files maintained in paper and/or electronic form. Sometimes personal information held by us is securely stored with third party data storage providers. We take all reasonable steps to protect personal information held by us from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records.

The privacy of your information is important to us and we will take reasonable steps to ensure that information about you is not subject to the danger of being lost, destroyed or damaged or of being accessed by unauthorised parties. However we cannot guarantee the security of information about you and do not accept liability if, despite our efforts, loss or damage arises from a failure to maintain privacy.

Why we collect, hold, use and disclose Personal Information

We collect, hold, use and disclose personal information for the purposes of:

- (a) providing legal and related services including the establishment, exercise or defence of a legal or equitable claim, the utilisation of a confidential alternative dispute resolution process, and securing litigation and/or disbursement funding
- (b) assessing and processing inquiries and requests for the provision of our services
- (c) marketing, including direct marketing and market research and analysis
- (d) the general conduct and management of our business, including provision and enhancement of our services and purchasing goods and services from others
- (e) meeting our legal obligations.

If the personal information we request is not provided, we may not be able to provide the relevant service.

Access Your Personal Information Held by us

You have rights to access and seek correction of your personal information held by us, as set out in Australian Privacy Principles 12 and 13. Please address all requests for access and correction of personal information to our administration on 03 9354 3110 or sales@unitedfoods.net.au

Complaints

If you are unhappy with the manner in which we have dealt with your personal information, or if you believe that we have breached our obligations under Australian privacy law, please contact our administration or sales@unitedfoods.net.au and we will do our best to respond to you within a reasonable time (normally, one month). If after that time we have not resolved your complaint, you may refer your complaint to the Office of the Australian Information Commissioner on 1300 363 992 or enquiries@oaic.gov.au.

Disclosure of Information to overseas entities

From time to time, as the our entity may require, we will be disclose your information to recipients outside Australia, in accordance with the Australian Privacy Policy principles (APP) and this Policy. To the best of our knowledge at this time, any such recipients would likely be located in Australia, New Zealand, United Kingdom, Canada, United States of America, Canada, Ireland (and Northern Island) the Netherlands, Singapore, the United Kingdom, the United Arab Emirates, Qatar, Saudi Arabia, Oman, Lebanon, France, Italy, Egypt, Turkey or Greece.