



Privacy Policy

Status:	Approved
Policy Owner:	General Manager Corporate Affairs
Policy Approver:	Chief Executive Officer
Date of Last Approval:	23 June 2020

Privacy Policy

Purpose The Privacy policy covers how Agritrade, a division of PGG Wrightson Limited (Agritrade) will manage individual customer, employee and third party information to ensure compliance with the Privacy Act.

Key Points This policy covers:

- Personal information that we collect, and why
- How we collect it
- Where we store it
- Our storage security procedures
- Keeping it complete, up to date and accurate before we use it
- How long we can keep it
- What we can use it for
- When we can disclose it
- Allowing the person who is the subject of the information to access it
- Correcting it if it is wrong.

Scope Agritrade Operations

Date of issue 11 February 2015

File retention Agritrade Website

Review This policy is reviewed every 2 years by General Manager Corporate Affairs with input from General Managers.

Related Policies and Documents

Privacy Act 1993 <http://legislation.govt.nz/>

Code of Conduct <https://www.pggwrightson.co.nz/Our-Company/Governance>

1. Policy Standard

1.1 Purpose

This policy explains how Agritrade will manage all personal information from any source in accordance with the Privacy Act 1993 twelve information privacy principles.

Agritrade is committed to ensuring the privacy of personal information is protected and we strive to uphold the best practice privacy standards in the collection, storage and use of personal information.

1.2 Definition

Personal Information means information about an identifiable individual.

1.3 Scope

This Privacy policy applies to personal information held about individuals. The Privacy Act and this Privacy policy do not apply to information we hold about companies and other organisations as they are not identifiable individuals covered by the Privacy Act. However Agritrade does keep confidential all information that we hold about companies and other organisations regarding their strategies, business affairs, accounts, finance or contractual arrangements.

This Privacy policy is applicable to:

- Agritrade customers, suppliers and third parties;
- Directors and Officers of PGW Group Companies;
- Employees (full time and part time);
- Temporary and Casual employees;
- Independent contractors
- Third party contractors (e.g. consultants); and
- The PGW Group of Companies (e.g. PGG Wrightson Ltd, subsidiaries of PGG Wrightson Ltd, associated companies over which PGW has significant influence; JV companies or consortia which are under the day to day management of PGW or a subsidiary of PGW).

1.4 Privacy Act 1993 Principles

The 12 Privacy Principles can be viewed [here](#).

How Agritrade complies with the Privacy Principles is set out below.

1.5 Personal information that we collect, and why

Personal information collected by Agritrade is collected for the purpose of managing customer transactions for products and services, supplier and other third party relationships, and employee relationships.

The personal information we collect differs depending on the nature of the relationship which of our products and services you are involved in, and may include:

- name, address and contact details
- date of birth
- gender
- account and newsletter preferences
- for employees, all employment related information
- for customers, information about a product or service you purchased from or sold to us, the place of purchase, deliveries and returns, and information about your ownership of the product
- information about any call to us, including a recording of the call, details about the product(s) you bought, the reason why you contacted us and the advice we gave you
- your business contact details, type of business and other business information, place of employment and position
- product reviews, comments, photos and forum posts that you have submitted
- credit and financial information and checks, including validation of identity and property ownership
- information about your social network profile such as your social network ID, profile picture, gender and location
- the fact that you have clicked on a 'like' or 'tweet' or similar button in one of our websites or services or one of our pages on a social network site, which we may associate with the details that we store about you
- information about your visit to our website, such as your browser software, which pages you viewed and which items you 'clicked' on
- service, product or server logs, which hold technical information about your use of our service, product or websites, such as your IP address, domain, device and application settings, errors and hardware activity
- information about where your device is physically located (for example, when you are using a geo-location service or application and you have provided consent to your location being shared)
- interests and preferences that you specify during setup of an Internet enabled product or service
- in the case of candidates seeking employment with us, and our employees, information relevant to your employment history.

If we request personal information from you and you do not supply it, we may not be able to provide you with the product or service you request. We also sometimes collect information about people who are not our employees or customers as part of providing a product or service, for example the other party to a sales transaction that you are involved in.

1.6 How we collect personal information

We collect personal information directly from you when you:

- become an Agritrade customer or employee and during the course of our relationship with you;
- set up an account;
- visit or use an Agritrade website, including any forums for example chatbot, (this may include the address of your Internet service provider, the name of the web page directing you and your clicks and activity on our website);
- place an order with us;
- subscribe to marketing and sales material or communications;
- complete an online form on one of our social media channels (for example, Facebook) or that is placed on a third party website;

- complete a survey;
- enter a trade promotion or competition;
- complete a hard copy form or provide information in one of our offices or warehouses;
- request delivery of products;
- make a purchase, return or exchange a product where we request you to verify your identity;
- provide information or feedback via phone, e-mail, chat or social media;
- speak with us, or one of our representatives directly during a product or other enquiry; or
- contact us directly by telephone, via mail, e-mail or online (inbound and outbound calls to the Agritrade Call Centre will be recorded).

Where we can, we will allow you to deal with us anonymously or by using a pseudonym. For example, if you wish to review a product or make a comment about our service, you are able to do this anonymously.

As listed above, information may be collected in various ways, such as mail, internet, telephone, face to face conversation, email, and in various formats such as forms, letters, electronic file notes and recorded conversations. Customers will be identified by a customer number and password (if applicable). Employees will be identified by an employee number and password (where applicable).

We may also collect personal information from other people, organisations and sources, such as when collection from you is impractical or where you have consented to us collecting it from someone else. These may be parties related to Agritrade or third parties such as your agent, where you have appointed an agent to act on your behalf in dealings with us (e.g. a broker or lawyer), or employment referees that prospective employees have given us.

1.7 Where we store personal information

Agritrade stores customer and employee personal information in a number of locations, including:

- customer and employee documentation is scanned into Agritrade's computer systems, various equipment, programmes, databases and digital archives
- physical paperwork is filed in a secure location
- electronic files are stored securely with third party cloud-hosting providers

These storage mechanisms may be managed internally by Agritrade and held locally in New Zealand, or they could be managed by a third party storage provider with whom Agritrade has a contractual relationship and be held on a server locally or overseas, including in the cloud. When information is stored overseas (e.g. Amazon Web Services or Microsoft Azure), we will ensure that the storage complies with our New Zealand privacy obligations.

1.8 Agritrade's storage security procedures

Agritrade will use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use or disclosure, such as:

- storing the personal information you provide in computer servers with limited access that are located in controlled facilities secured by surveillance and security technology
- following certain procedures, for example checking your identity against available data when you telephone us and using secure passwords for our computer systems and softwares
- limiting physical access to Agritrade's premises
- limiting access to personal information to those who specifically need it to conduct their business responsibilities
- requiring our third party providers to have acceptable security measures to keep personal information secure
- putting in place physical, electronic, and procedural safeguards in line with industry standards; and
- destroying personal information pursuant to the law and our record retention policies.

Agritrade cannot guarantee that your personal information cannot be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur. If we provide you with any passwords or other security devices it is important that you keep these secret and confidential and do not allow them to be used by any other person. Please notify us immediately if the security of these devices is breached to prevent the unauthorised disclosure of your personal information.

1.9 Keeping personal information complete, up to date and accurate before we use it

Agritrade will not use any personal information about our customers or employees without taking reasonable steps to ensure that the information is up to date, complete, relevant and not misleading.

Please take care when submitting personal information to us, in particular when completing free text fields or uploading documents and other materials. Some of our services are automated and we may not recognise that you have accidentally provided us with incorrect or sensitive information.

If you believe that any of the personal information that we hold about you is not accurate, complete or up-to-date, please let us know.

1.10 How long we can keep personal information

Agritrade will keep personal information about customers or employees for as long as they continue to hold that relationship with Agritrade.

Thereafter, personal information will not be used after six years of the termination of the relationship, unless required by law.

1.11 What we can use personal information for

Personal information will be used by Agritrade in association with any past or future sales, transactions, interactions or proposals between Agritrade and the customer or employee including to:

- identify you when you telephone us to make an enquiry. For example, we may ask for your date of birth so that we can avoid disclosing information to a person who is not authorised by you to receive it
- provide or contact you about any services, products, loyalty, survey or marketing programmes provided by us previously, now or in the future
- answer your enquiries and provide customer service to you
- tell you about other products or services that we think may be of interest to you, for example using remarketing capabilities
- enable us to undertake a credit assessment
- manage and resolve any legal, consumer or commercial complaints and issues
- help prevent or detect fraud or loss
- contact you by any means (including mail, email or telephone) in relation to a particular service or product
- contact you for research/feedback purposes
- make changes to your Agritrade account details
- provide you with a product or service you have requested, including checking that a payment is not made fraudulently, delivering your purchase to you or ensuring that you benefit from any relevant special offer or promotion
- train staff and for quality assurance purposes
- obtain opinions or comments about Agritrade products and/or services, including conducting marketing research and analysis and product surveys
- respond to your requests for information when you contact us about Agritrade and its products and services
- conduct prize draws, contests and other promotional offers

- consider employing you if you contact us via one of Agritrade's job application websites
- record statistical data for marketing analysis
- manage employee information, including using it for human resources, payroll and health and safety matters, and data-matching.

1.12 When we can disclose personal information

Agritrade may disclose personal information:

- if it is one of the purposes for which the information has been obtained (for example to undertake a credit check for the purpose of processing an application for credit, or for bank transaction business);
- to you or someone acting on your behalf including those persons nominated by you, executors, trustees and legal representatives;
- to another Agritrade business;
- to companies that perform services on our behalf such as printers, post suppliers, delivery and distribution companies, data entry service providers, trade promotion or gift card administration, account management providers, IT companies that manage and maintain our database, survey companies acting on our behalf and digital marketing agencies (for the purposes of targeting on social media);
- to professional advisers (such as lawyers or auditors);
- to payment systems operators and financial institutions;
- to organisations authorised by Agritrade to conduct promotional, research or marketing activities;
- upon lawful request from law enforcement agencies or government authorities;
- if it is necessary to enable a sale of Agritrade's business;
- if it is necessary to prevent a serious or imminent threat to public health or safety;
- if it is authorised by the Privacy Commissioner;
- where the personal information is publicly available;
- if it is necessary to avoid prejudice to the maintenance of law; or
- where the information will not be used in a form which identifies you.

We prepare anonymous, aggregate or generic data (including "generic" statistics) for a number of purposes, including for product and service development, business promotion and research purposes. As we consider that this is not personal information, we may share it with any third party (such as our suppliers, advertisers, industry bodies, the media and/or the general public).

1.13 Allowing the person who is the subject of the information to access personal information

Any individual is entitled to confirmation from Agritrade as to whether we hold personal information and are entitled to request a copy of that personal information, which will be provided within 20 working days if it is readily retrievable.

To protect the privacy of our customers, Agritrade will verify our customer is who they say they are before we provide access to or change information.

Any requests made by an agent on your behalf (such as a lawyer or broker) must be accompanied by a written authority from you authorising that particular agent to act on your behalf.

Any requests from outside of Agritrade for access to personal information should be made to the General Manager Corporate Affairs.

Any requests from Agritrade employees for access to personal information should be made to the General Manager Human Resources.

The Act outlines circumstances under which we may refuse to allow you access to some or all of your personal information. In such cases, we will give you a reason for our decision.

1.14 Correcting personal information

Individuals have the right to request access to personal information we hold about them, and request us to correct any inaccurate, out-of-date, incomplete, irrelevant or misleading personal information.

1.15 Unique identifiers

A “unique identifier” is a tag that does not use the individual’s name. Agritrade will only assign a unique identifier, e.g. a customer account number or employee number, if this is necessary to enable us to carry out our functions effectively.

1.16 Direct Marketing

Agritrade may use your information to provide you with newsletters and direct marketing communications by post, email, telephone and/or text message, if you have provided consent for your information to be used in this way (for example, through a catalogue, email, SMS/TXT message or direct mail permission), or we are otherwise permitted to do so under applicable law.

When we contact you, it may be by mail, telephone, email, SMS/text message or social media message.

- You can change your marketing communication preferences at any time: if you would like to unsubscribe from an email sent to you, follow the ‘unsubscribe’ link and/or instructions placed (typically) at the bottom of the email. But note that:
- if you use more than one e-mail address to contact Agritrade, you will need to unsubscribe separately for each email address; and
- this method will only unsubscribe for the newsletter or other communication that you have received and you should use one of the other methods if you wish to opt-out of all our marketing communications,
- you can contact us in order to change your marketing communication preferences.

1.17 Agritrade’s websites

Please also refer to our Website Terms of Use located on our websites.

From time to time, Agritrade may enable third parties to advertise on its websites. If the link is followed to the third party website from the Agritrade website, the website privacy policy of that third party applies, and Agritrade accepts no liability for breaches of privacy once such a link has been followed.

Agritrade’s websites collect the domain names, not the email addresses of visitors. Our web server may require you to place a “cookie” (small data file) on your computer’s hard drive or device, in order to track statistical information about navigation to and throughout certain areas of the site. If you are just surfing and reading information on our website, then we collect and store the following information about your visit:

- the IP address of your machine when connected to the Internet and the domain name from which you are accessing the Internet
- the operating system and the browser your computer and/or device uses, and any search engine you are using
- the date and time you are visiting
- the URLs of the pages you visit
- if you provide it, your email address.

We use that information to measure the number of visitors to different parts of the site and, for example, to measure the effectiveness of advertising. Although we may publish aggregated information about usage patterns, we do not disclose information about individual machines except for the reasons set out below in this section. We may gather more extensive information if we are concerned, for example, about security issues. If we think it is necessary, we can disclose information to relevant law enforcement authorities, such as the Police or the Department of Internal Affairs.

Some of our online services may allow you to upload and share messages, photos, video and other content and links with others and/or create a publicly accessible profile for your account. For example:

- the communities and forums area of our websites, allows you to post comments (with your account name), which are visible to other users of that service; and
- other services allow you to share a link which if clicked on may allow the recipient to access your uploaded content.

You should not expect any information that you make available to others via Agritrade's online services to be kept private or confidential. Content and links that you share might, for instance, be forwarded by your recipients to others. You should always exercise discretion when using such services.

1.18 Monitoring communications

Agritrade may monitor and record communications we receive, including recording and storing phone calls. This may be done for quality and training purposes to improve the service that we provide, to ensure compliance with our practices and procedures and/or to provide evidence of a transaction such as where a contract is entered into, or a claim is made.

2. Clarification and Breaches

2.1 Clarification

Further clarification of this policy can be obtained from:

- for Agritrade employees and contractors – the General Manager Human Resources
- for legal issues, the General Manager Corporate Affairs
- for customers and third parties – Agritrade’s Business Support Services Manager or Contact Centre Manager.

2.2 Breaches of policy

If you want to report a suspected breach of your privacy or you do not agree with a decision regarding access to your personal information, please contact us. We have an internal complaints process to address such issues and will promptly acknowledge and investigate complaints.

Any enquires or complaints can be made direct to the Agritrade managers outlined in section 2.1.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the office of the Privacy Commissioner phone toll free 0800 80 39 09.