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## Policy Statement

Drake Supermarkets Pty Ltd (ACN 109 544 416) and its related bodies corporate (“we”, “our” or “us”) are committed to the protection of personal privacy within the scope of the applicable law. This Privacy Policy covers our treatment of personal information that we collect, use and disclose.

## Types of personal information collected

The types of personal information that we collect and hold will vary depending on your dealings with us. The information may include any or all of the following:

- name, address(es), telephone number(s) and other contact details;
- electronic address(es);
- payment information (such as credit card or bank details);
- standard employment information for recruitment purposes;
- other personal information required to provide our services; and
- transaction details relating to your use of our products, services or benefits.

We will also collect your date of birth (and driver’s licence number) where required (eg, to comply with any legal requirements).

We may collect sensitive information but only if you agree to provide it to us. If you agree to provide us with sensitive information, we will only use it in accordance with the *Privacy Act 1988*.

From time to time, you may provide us, and we may collect from you, personal information of a third party (for example, for delivery purposes). Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this Privacy Policy, understand it and agree to accept it.

You do not have to provide us with any personal information, however if you do not do so, we may not be able to provide you with the products, services or benefits you have requested.

## How we collect personal information

Generally, we collect personal information directly from you, such as:

- when you submit information through our website;
- when you submit information via our social media sites and smartphone applications;
- in person;
- when you enter into a promotion conducted by us or a third party;
- when you complete a survey or provide feedback;
- when you order goods or services;
- in the course of us providing you with a requested product, service or benefit; or
- when you have other dealings with us.

We collect personal information through:

- our related bodies corporate;
- our business partners; and
- third parties who supply services to us.

## Why we collect, use and disclose personal information

We will use the personal information we collect for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent, or where authorised or required by the law.

We will collect personal information for the following purposes:

- to establish and maintain your relationship with us;
- to provide the products and services you have requested from us;
- to register you for events and promotions;

- to assist us to make our services and products more valuable or useful to you;
- to answer any inquiry you make; or
- to screen your suitability for a job.

We may also disclose your personal information to third parties who work with us in our business to provide, promote or improve the products or service you have requested or are interested in, such as:

- manufacturers and suppliers;
- marketing consultants and promotions companies; and
- consultants and professional advisers.

### Direct Marketing

We will also use and disclose your personal information to send direct marketing to you from:

- us;
- our related bodies corporate.

The direct marketing may relate to:

- our products and services;
- the products and services of other parties;
- promotions run by us or other parties; or
- new developments we believe may be of interest to you.

You may opt-out of receiving direct marketing through the unsubscribe function that will be made available to you with each direct marketing communication.

### How we store and protect personal information

We store personal information in a combination of computer storage facilities, paper-based files and other records. In doing so, we have taken numerous steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure. Additionally, we take reasonable steps to destroy or permanently personal information when we no longer need it.

The internet is not a secure method of transmitting information. Accordingly, other than where we use secure socket layer technology (SSL) to ensure information is securely transmitted and processed, we cannot and do not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

### Do we send personal information overseas?

We will not transfer your information outside Australia.

### How you can access your personal information

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. If your personal details change, such as your address or phone number, please contact our Privacy Officer.

At your request, we will provide you with a copy of any personal information which we hold about you, unless an exception under the *Privacy Act* 1988 applies. We may charge a fee for retrieving this information, in which case we will inform you of the fee and obtain your agreement to that fee before providing the information.

We will promptly acknowledge and investigate any complaint about the way we manage personal information.

### Cookies

Our website may use cookies to track user traffic patterns and to better serve you when you revisit a website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie can contain information, such as a user ID which the website uses to track the pages you have visited. You can refuse all cookies by turning them off in your browser. However, full functionality for our website requires the use of cookies.

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Information is also generated whenever a page is accessed on our website that records information such as the time, date and specific page. We may collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

### How to contact us or make a complaint

If you have any questions about this Privacy Policy, if you wish to update information we hold about you or if you wish to make a complaint about our collection, use or disclosure of your personal information under this Privacy Policy, please contact:

#### The Privacy Officer

Upper Level, 159 Henley Beach Road  
Torrensville SA 5031

(08) 8416 6100  
Privacy@drakes.com.au

We will take reasonable steps to remedy any issue resulting from our failure to comply with our privacy obligations.

This policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and practices. The most current version of the policy is located on our website and can be obtained by contacting our Privacy Officer.



**Roger Drake**  
**Managing Director**

February 2014