BUNGE

Privacy policy

This privacy policy (the **Policy**) sets out in accordance with the Privacy Act 2020 (New Zealand) (**Privacy Act**) including the Information Privacy Principles (**IPPs**), the way in which Bunge Operations Pty Ltd and its associated entities (together **Bunge, we, our, us**) may collect. store, use, manage and protect your Personal Information.

By:

a) using the Bunge website;
b) accessing, requesting, enquiring about. ordering or purchasing Bunge's products and services (either online or in person);
c) entering into agreements or other contracts with Bunge; or
d) providing Personal Information to Bunge, its officers, agents or employees,

after this Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your Personal Information by Bunge in accordance with this Policy and the Privacy Act.

If you do not agree to Bunge handling your Personal Information in the manner set out in this Policy you must immediately cease to access our website, our applications or our products and services, and if relevant and applicable you should terminate your agreement with Bunge (in accordance with the terms of that agreement). and you should not provide Bunge with any of your Personal Information.

1. What is personal information?

We follow the definition of Personal Information given in the Privacy Act as being:

... information about an identifiable individual.

Generally words and phrases in this Policy are used in accordance with or as they are defined in the Privacy Act.

2. What kinds of personal information might we collect and hold?

We may collect (and hold) different Personal Information from you depending upon how you interact with Bunge.

If you access our website or applications, we may collect information about how you have used our site, including but not limited to:

a) Internet Protocol 'IP' address;
b) device ID;
c) MAC address;
d) browser information;
e) installed software;
f) hardware type;
g) access date and time; and
h) length of session time.

If you access our applications we may also collect information about how you have used our applications, including but not limited to:

a) application usage data; and
b) interaction with other applications.

If you contact Bunge, or if you provide services to Bunge, we may collect:

a) location, geographical and geo-tagged information;
b) your contact details (i.e. name, address, telephone number and/or email address);
c) details about your cropping area;
d) details of your crop type; and
e) your Drivers Licence or permits or other identification or documentation relating to your skills and qualifications.

If you attend any of our facilities or offices, we may use Closed Circuit Television Cameras and other photographic equipment to record:

a) your image;
b) the date and time of your attendance; and
c) your actions whilst at the relevant site. We may also collect information about:
d) your demographic;
e) your interests;
f) your purchases of products and services related to our activities;
g) your dealings with us (including records of telephone, email, online and other interactions);
h) your education and employment history (if you apply for a job with us); and
i) biometric data (including your fingerprint) from current employees of Bunge.

3. How do we collect personal information?

We generally collect Personal Information directly from you (when we contact you, when you contact Bunge, when we communicate with you, when you visit one of our facilities or offices, when you present your fingerprint as part of your employment with us, when you post about Bunge on social media, attend an event we have organised or sponsored, or when you complete a survey).

We may collect Personal Information about you from a third party (e.g. publicly available sources, grower registers trade references or employer references).

If you provide us with Personal Information about a third party, you warrant that that third party consents to us collecting and using their Personal Information in accordance with this Policy.

4. How do we hold and secure your personal information?

We take reasonable steps to securely store your Personal Information to ensure it is protected from unauthorised or accidental access, disclosure, loss, alteration or destruction and to ensure it is not subject to an action that prevents Bunge from accessing that information, whether temporarily or permanently. We store your Personal Information using various methods such as hard copy format, digitally, on site, and with third party storage providers. All hard copy material is secured using industry accepted methods. All digital material is secured using secure company IT systems. Any digital transfer of Personal Information is secured using a range of secure methods including but not limited to encryption.

We will keep Personal Information as long as we need it for the purposes in section 5 of this Policy, or as long as we are required by law to retain it, after which time we will destroy it or de-identify the Personal Information.

If any of your Personal Information is subject to accidental or unauthorised access, disclosure, loss, alteration or destruction, or is the subject of an action that prevents Bunge from accessing that information temporarily or permanently, regardless of whether that action is intentional, unintentional or through no fault of Bunge, we will promptly investigate the incident and comply with the mandatory data breach notification requirements under the Privacy Act.

Subject to the exceptions in the Privacy Act, we will notify you as soon as practicable if we identify a data breach which it is reasonable to believe has caused serious harm to you or is likely to result in serious harm to you. If it is not reasonably practicable to notify you, we may instead give public notice of the data breach.

5. Why do we collect, hold, use and disclose personal information?

By providing us with your Personal Information, you consent to us using and disclosing your Personal Information for the following purposes:

a) for the purposes of your employment with Bunge;
b) establishing and maintaining a responsible commercial relationship with you;
c) providing you with products or services;
d) understanding your needs and preferences and/or determine your eligibility for products, services, loyalty programs, rebates and/or promotions;
e) providing you with information about our products or services;
f) developing, enhancing, refining or marketing products or services;
g) managing and developing our business, operations and planning;
h) providing you with marketing material;
i) contacting you in relation to our business activities;
j) better understanding our clients and customers;
k) tailoring our marketing, services, promotions and operations;
l) enabling Bunge to meet legal and regulatory requirements;
m) working with Government and non-Government departments to assist with research and the discharge of legislative functions: and
n) corporate governance, auditing and record keeping.

Our use of Personal Information may extend beyond these uses, but will be restricted to related purposes that you would reasonably expect, and for other purposes required or authorised by law.

6. What do we do with your personal information?

If we collect Personal Information from you, we may:

a) use that information for any of the reasons or purposes in section 5 of this Policy;
b) store that information in accordance with this Policy:
c) share that information amongst our subsidiaries and entities we work with, including our joint venture partners:
d) pass that information to third parties who provide products or services to Bunge (including our accountants, auditors, lawyers, insurers, IT contractors, regulators and end point royalty managers): or
e) provide that information to third parties as required by law.

7. Do you use my information for direct marketing?

By providing us with your Personal Information you consent to us communicating directly with you to promote or offer a product or service (Direct Marketing). We use Direct Marketing to provide you with information about products or services that we believe you may be interested in. If you receive Direct Marketing material from Bunge, and do not wish to continue receiving it. please contact Bunge by any of the methods set out in section 18, below, asking to be removed from all future Direct Marketing programs. Once we have received your opt-out request. We will remove you from our Direct Marketing programs as soon as reasonably practicable. Alternatively, if we have contacted you by email, you may use the "unsubscribe" function in that email to notify us that you do not want to receive further Direct Marketing from us.

8. What about cookies?

When you access our websites, we may receive information about you via a 'cookie'. A cookie is a piece of information that our web server may send to your

computer when you visit the website. The cookie is stored on your machine, but does not identify you or give Bunge any information about your computer. A cookie helps Bunge to recognise when you re-visit the website, and to optimise your experience. You may configure your web browser to refuse or disable cookies.

Our website may contain links to other websites. We are not responsible for the privacy practices or the use and protection of your Personal Information on those other websites.

If you provide any Personal Information to Bunge via an online service or application, or if we provide information to you by such means, the privacy, security and integrity cannot be guaranteed during its transmission unless we have indicated to you beforehand that a particular transaction or transmission of information will be protected (for example by encryption).

9. What about location data?

Bunge may collect and process your location data to provide location related services. The location data is processed and stored only for the duration that is required for the provision of the location related services.

Bunge may use, depending on the service:

a) IP-based location based on the IP address presented by the end-user;
b) fine geo-location data based on coordinates obtained from a mobile device's GPS radio; or
c) coarse, network-based geo-location data based on proximity of network towers or the location of WiFi networks.

Fine GPS-based geo-location data is not accessed, collected or used without your consent. Bunge will not share GPS geo-location data about you with third parties without your consent unless required by law. To the extent that Bunge makes available GPS geo location to third parties in accordance with this Policy, it will be

de-identified prior to disclosure.

10. Disclosure of personal information to other organisations

Bunge may disclose your Personal Information to:

a) certain contractors or subcontractors of ours that provide administrative or promotional services to Bunge, for example, mail processing businesses, printers, or market research companies. We seek to enter into contractual agreements with these organisations to ensure that information we disclose is used only for the limited purposes for which we have provided it;
b) our related company Bunge Ltd, and its subsidiaries. Any information provided to Bunge Pty Limited will be handled in accordance with this Policy:
c) National Grower Register Pty Ltd or its agents (see section 1 2).

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

11. Do we ever send your information overseas?

Bunge may disclose your Personal Information to overseas third parties who provide services to Bunge (including for example Kronos) for the purposes set out in section 5 of this Policy. Bunge does also, at times, disclose information to our parent company, Bunge Limited, a privately held company incorporated in Jersey and based in The Netherlands. Bunge Limited has a Privacy Policy which is governed by the laws of The Netherlands.

We will take reasonable steps to ensure that any Personal Information that we provide to Bunge Limited, or any other overseas third party, is treated appropriately.

As at the date of this Privacy Policy, Bunge is not likely to disclose Personal Information to other overseas recipients.

We will only disclose your Personal Information to the above overseas recipients where we believe on reasonable grounds that the overseas recipients are subject to comparable privacy safeguards as those in the Privacy Act.

12. How do we deal with sensitive information for prospective employees?

If you have enquired about or applied for a job or position with Bunge, we may collect (and hold) Personal Information about you which we reasonably consider to be sensitive, which may include your health information or criminal record (**Sensitive Personal Information**).

Sensitive Personal Information will be collected for the purpose of pre-employment assessment and only with your consent.

By providing or enabling Bunge to collect Sensitive Personal Information, you consent to our collection, use and storage of that information for the purpose of conducting a pre-employment assessment.

If we wish to use your Sensitive Personal Information for any secondary purpose we will only do so with your consent.

Bunge will not disclose your Sensitive Personal Information for the purpose of direct marketing without your consent.

13. How do we deal with sensitive information for current employees

If you are currently employed with Bunge, we may collect (and hold) Sensitive Personal Information about you, which may include your health information, criminal record or fingerprint. If your job or position requires you to provide your fingerprint for the purpose of time and attendance records, it will be captured directly by Kronos in their system and secured in an encrypted version in their cloud.

By providing or enabling Bunge to collect Sensitive Personal Information, you consent to our collection, use and storage of that information for the purpose of your employment with Bunge.

If we wish to use your Sensitive Personal Information for any secondary purpose we will only do so with your consent.

Bunge will not disclose your Sensitive Personal Information for the purpose of direct marketing without your consent.

14. Can you access your personal information or request that it be corrected?

a) You may request confirmation of whether we hold any Personal Information about you and access to the Personal Information that we hold about you by contacting Bunge by any of the methods as set out in section 18 (an **Access Request**).
b) Upon receiving an Access Request we may request further details from you to verify your identity. We reserve the right not to provide you with access to Personal Information if we cannot verify your identity to our reasonable satisfaction.
c) We will as soon as reasonably practicable and in any case within 20 working days (subject to our right to extend time limits in some circumstances) respond to your Access Request by:
    i. providing you with access to your Personal Information; or
    ii. rejecting your Access Request. and providing you reasons for this rejection.
d) Access Requests may be denied where:
    i. we believe your request is frivolous, vexatious or trivial;
    ii. the requested access will have an unreasonable impact on the privacy of others;
    iii. we are entitled to reject it by law;
    iv. we are unable to verify your identity; or
    v. you have not paid the administrative fee, if applicable, referred to in this section 15.
e) If you believe that the Personal Information that we hold is inaccurate or otherwise requires correction, you may send Bunge a correction request by contacting Bunge by any of the methods as set out in section 18. We will review your Personal Information and then amend our records if we are satisfied that the information we hold about you is inaccurate, incomplete or out-of-date.
f) Generally, we would not charge any fees when responding to your Access Request or correction request. In some limited circumstances, we are permitted to charge an administrative fee to cover our costs in providing you with access to your Personal Information or correcting your Personal Information. This fee will be explained to you before it has been incurred.

15. What happens if you want to deal with Bunge anonymously or using a pseudonym?

If you do not want to disclose your Personal Information to us, you can deal with Bunge either anonymously or by using a pseudonym if you choose. If, however, you do so we may not be able to provide you with accurate or useful information, and you may not be able to access a full range of our products and services.

16. Does this policy ever change?

This Policy is current as at February 2023. From time to time we may make changes to this Policy to ensure we maintain the highest standards. Changes come into effect from the time when they are brought to your attention, or when you next log on to our website, whichever is earlier.

You should review the Policy each time you visit our website to keep up to date on any changes. The date of this Policy will inform you as to whether there have been any updates since your last visit.

17. What happens if you have a question or complaint about how we have handled your personal information?

If you have a question or complaint. you can raise it with Bunge by:

Emailing privacy@bunge.com

Calling Bunge on 1800 018 205; or

Sending a letter to: The Privacy Officer,

Level 1, 226 Greenhill Road, Eastwood SA 5063.

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious.

Complaints will be dealt with in accordance with our Complaints handling policy, which can be found at www.bunge.com/nz.

If you aren't satisfied with the way we have handled your complaint. you can make a complaint to the Office of the Privacy Commissioner. For further information see: https://www.privacy.org.nz/your-rights/making-a- complaint/