



1. Introduction

The protection of private and confidential information is fundamental to McCormick & Co (ABN 14 812 809 670) (“McCormick & Co”, “our”, “us” or “we”).

We are committed to safeguarding personal information we hold on behalf of our customers and third parties and is required to do so in accordance with the requirements of the Australian Privacy Principles of the Privacy Act 1988 (Cth) (“Act”).

This Privacy Policy outlines how personal information is handled (including the collection, storage, access and use of personal information) by us and our website at www.mccormickco.com.au (“Website”).

2. Collection of Personal Information

The personal information we collect from the Website and store may include (but is not limited to) your name, address, contact details, gender, occupation, company and if relevant, financial information, including credit card information and banking details.

We do not collect your “sensitive information” (as defined in the Act, which includes information such as your racial background, religious beliefs or health information) through our Website.

You are not under any obligation to provide your personal information to us. You may also choose to deal with us anonymously or by using a pseudonym. However, if you do not provide your personal information to us, we might not be able to provide you with requested product or services you request.

The information collected from will be accessed only by authorised staff or agents of McCormick & Co for the purposes described above. In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

3. Collection of Data

When you access the Website, our server makes a record of your visit and logs information such as the user's server address, the date and time of visit to the site and the pages accessed and documents downloaded from the site.

The data listed above is collected for the purposes of website and system administration, including monitoring to prevent security breaches, enhancement of the Website to the user's needs and research and development.

No attempt will be made to identify users or their browsing activities, except in the unlikely event of an investigation, where a law enforcement agency may exercise its authority to inspect the Internet Service Provider's logs.

As part of its functionality, the Website also uses "cookies". A "cookie" is a small amount of electronic data that is often used by a "host computer" (for example, the computer on which the Website is hosted) and a "local computer" (that is, the computer that you use to browse the Website) to communicate information back and forth. Cookies may be used by the Website in order to obtain statistical data. No personal information will be collected via the use of cookies.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, you should note that cookies may be necessary to provide you with some features of our online services.

4. Use of Personal Information

Your personal information will be used for the purposes for which you have provided it. That means we collect it to supply you with the products you have asked for and to provide you with the best possible service. When you submit a form on our Website or purchase a good or service from our Website, you grant us permission to contact you, which may include daily emails, weekly coaching tips and additional promotional materials.

Your personal information may also be used in order to:

- provide the products, services and information you require;
- administer and manage those services (including charging, billing and collecting debts if required);
- inform you of our activities, products, events, facilities and services;
- provide you with news articles or other materials;
- research, develop and expand our facilities and services;
- gain an understanding of our users, customers and your needs to provide a better service in all its areas of activities; and

- the personal information may also be collected to promote and market other services that we consider important or beneficial to our members and you.

We will not otherwise use your personal information for any other purposes (unless required by law) without your consent.

You have the right, at any time, to opt out of receiving any advertising or marketing material from us, by either following the “opt out” or “unsubscribe” instructions attached to our emails, marketing materials or otherwise by contacting us via our contact details located at the end of this Privacy Policy. We may call you within 14 days of receipt of your “opt out” or “unsubscribe” request to confirm that you intend to opt out or unsubscribe.

5. Disclosure to Third Parties

We sometimes team up with third-party companies or suppliers to offer events, products or services (“Preferred Partner”). When necessary, we may provide personal information to a Preferred Partner that they need to assist in provided the services you require or the events you wish to be involved with. In these circumstances, we have arrangements in place with our Preferred Partner that limits their use or disclosure of your personal information to these purposes and in accordance with the Act.

Other than the above, we will not, in the course of our operations, disclose personal information to any outside parties without your consent.

In certain circumstances, we may be compelled by law to disclose personal information to various authorities, such as where we are compelled to disclose the personal information by a warrant, to react to unlawful activity, serious misconduct, or to reduce or prevent a serious threat to life, health or safety.

We will not sell your personal information collected from the Website to third parties. We will not disclose your personal information to overseas recipients.

6. Protection of Information

We take reasonable steps to protect any personal information that we holds from misuse and loss. We also take reasonable steps to protect that information from unauthorised access, modification and disclosure.

Some of the steps we take to protect our data include educating our employees about this Privacy Policy and how to handle personal information. We have internal policies in place to manage access privileges, to ensure that only those who really need to can see your personal information.

We maintain physical security, such as locks and security systems, over our electronic data servers, computers and premises. We also maintain up-to-date computer and network security, for example firewalls, anti-virus software, identification codes and passwords and other security measures, in order to

control access to computer systems. We also regularly back-up our electronic data to minimise loss of data in the event of system failures.

We do not warrant the security of any information supplied through the Website. While we will take all reasonable steps to ensure that our electronic data is transferred and stored securely, we do not warrant that any information supplied through the Website is safe in all events of unauthorised access.

7. Your access to personal information

You may retrieve a copy of your personal information that we hold by contacting us via our contact details located at the end of this Privacy Policy.

We will endeavour to take all reasonable steps to keep any information that we hold about you accurate and up-to-date. If, at any time, you discover that information held about you is incorrect, misleading or outdated or if you otherwise wish to review or correct that information, please contact us.

There are circumstances where, by law, we may not give you access to the personal information we hold about you. For example, we cannot give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

8. Changes to this Policy

Changes may be made from time to time, without notice, to this Privacy Policy as required when new laws, policies or services are introduced.

This Privacy Policy was last updated on 8 April 2014.

1. Related Legal Information

We direct users to the Terms of Use in relation to use of the Website.

2. Contact Us

If you have any questions regarding this Privacy Policy or would like more information about the way we manage personal information, or if you wish to make a complaint about how we have handled personal information about you, please contact us using the following contact details:

By post: McCormick & Co Level 1 / 459 Toorak Road, Toorak Vic 3142

By telephone: +61 (0) 3 9296 2044

By email: info@mccormickco.com.au

If you make a complaint about privacy, we will acknowledge receipt of your complaint, and try to investigate and respond to you within 30 days. If you are

unhappy with the outcome, you can lodge a complaint with the Office of the Australian Information Commissioner.

For further information about privacy issues and the protection of privacy, please visit the Australian Federal Privacy Commissioner's website at <http://www.privacy.gov.au>.

If you consider that we have not adequately dealt with a complaint, you may complain to the Office of the Australian Information Commissioner on the below details:

Officer of the Australian Information Commissioner (OAIC)
GPO Box 5218
SYDNEY NSW
2001
or
enquiries@oaic.gov.au
or
1300 363 992

This policy is to be reviewed as follows:

- Annually as a minimum.
- Following an information security incident.
- Following significant changes to our systems.
- Following changes to the relevant State and Commonwealth Legislation.

Reviews are to examine the appropriateness of the policy taking into consideration corporate, system and compliance requirement changes since the last review was undertaken.

The most up to date version of McCormick & Co.'s Privacy Policy will be available on our website: <http://www.mccormickco.au>