

CANDY CLUB HOLDINGS LIMITED ACN 629 598 778

(‘Company’)

PRIVACY POLICY

Candy Club Limited (ACN 629 598 778) (**Company**, “**we**”, “**us**”, “**our**”) respects your privacy. We are committed to ensuring all information we collect or hold is handled respectfully and in accordance with relevant privacy laws including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This policy explains how and why we collect, use, hold and disclose your personal information together with your rights to access and correct that information or make a complaint about our handling of personal information.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

1. What is personal information?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

2. What personal information do we collect and hold?

The Company will only collect personal information from individuals as required to conduct our business operations. This includes when individuals use our website, apply for a position, work with us, attend our sites, invest in us or engage with us in other ways. Generally, the types of personal information we collect will include name, contact details and records of communications with us including your history of purchases and use of our products and services and details of enquiries or complaints you make.

- (a) In addition, we collect personal information relating to:
- (b) shareholders: information about the shareholding, banking details and tax file numbers for payment of dividends and other amounts; and
- (c) job applicants: employment and academic histories, the names of referees and in some cases, limited health information based on testing undertaken by or for us. We will collect this information directly from organisations that provide recruitment related services to us and from third parties who provide job applicants with professional or personal references.

We will also collect personal information, including names and contact details about:

- (d) our suppliers: this information is collected for business-related purposes but contains some limited personal information contact details of the people that we deal with;
- (e) people who correspond with us, including through our website, in which case we may keep a copy of that correspondence and relevant contact details; and

- (f) people who request information updates about us through our website mailing list.

3. Why do we collect, hold and use your personal information?

We may use personal information for the primary purpose for which it is collected (e.g. provision of our services, including administration of our services) or for secondary purposes which are related (or directly related to the case of sensitive information) to the primary purpose.

We collect, hold and use your personal information so that we can:

- (a) comply with our legal obligations and assist government and law enforcement agencies or regulators;
- (a) communicate with, and comply with our legal obligations to, our shareholders, and to process payments to them;
- (b) enable third party service providers to produce us and our related companies with services such as information technology, auditing, legal advice, printing and mailing services, and services related to our share register;
- (c) correspondence with people who have contacted us, and deal with feedback;
- (d) provide services to, and manage, our related companies;
- (e) consider applications from prospective employees or contractors;
- (f) maintain and update our records;
- (g) conduct or participate in investigations or due diligence;
- (h) facilitate transactions involving the Company or any of our affiliates;
- (i) manage our operations (including safety and security);

Where appropriate, we will confirm your express consent before collecting such information.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

4. How do we collect your personal information?

We will collect your personal information directly from you whenever you interact with us.

We may collect information from third parties – for instance, information regarding shareholders is collected from our share registrar, and information about job applicants is collected in the manner set out above.

5. How do we store and hold personal information?

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure. Processes including taking steps to restrict access to databases, maintaining firewalls, encrypting data, using secure servers in controlled facilities and only allowing access by those entrusted with authority and computer network passwords. We also require all employees to comply with information security policies.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

However, the internet is not a secure environment and no computer system is perfectly secure. Although all care is taken, we cannot guarantee the security of information provided to us. This means that there is always a risk that your personal information may be accessed or used without authorisation.

6. Who do we disclose your personal information to, and why?

We may transfer or disclose your personal information to our related companies.

We may disclose personal information to external service providers (including IT service providers, auditors, legal advisors, mail houses and our share registrar) so that they may perform services for us or on our behalf.

We may also disclose your personal information to others outside our group of companies where:

- (a) we are required or authorised by law to do so;
- (a) you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- (b) we are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our assets or business changes, we may transfer your personal information to the prospective or new owner.

7. Do we disclose personal information to overseas recipients?

We may disclose your personal information to recipients/related bodies corporate which are located outside Australia.

The Company may also use overseas facilities to process or back up its information. As a result, we may transfer your personal information to our overseas facilities for storage. However, this does not change any of our commitments to safeguard your privacy.

8. Access to and correction of your personal information

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. We may need to verify your identity before giving you access to your personal information. There are some circumstances in which we are not required to give you access to your personal information (for example, where a legal exemption applies).

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate and up to date.

9. Complaints

If you have a question about our policy or wish to make a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us in writing. Our contact details are set out below.

We will consider your complaint promptly and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

It is our intention to use our best endeavours to resolve any complaints to your satisfaction. However, if you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (**OAIC**) for guidance on alternative courses of action which may be available.

Office of the Australian Information Commissioner

Phone: 1300 363 992

Mail: GPO Box 5218

SYDNEY NSW 2001

Website: www.oaic.gov.au

10. Contact details

If you have any questions, comments, requests or concerns, please contact us at www.candyclublimited.com.au

11. Changes to this policy

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website www.candyclublimited.com.au.