JBS Australia Privacy Policy

Policy details			
Effective Date	2 July 2025		
Policy Owner	Legal		
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Version	Reason for Release	Date Released	Author
1.1	Minor amendments	2 July 2025	General Counsel & Company Secretary

1. INTRODUCTION

1.1 In this Policy, 'we', 'us' and 'our' means Baybrick Pty Ltd (ABN 97 067 220 017) and its brands, trading entities and related companies in Australia and New Zealand (excluding listed entities). The brands, trading entities and related entities in scope under this Policy include (but are not limited to) JBS Australia, Primo, Huon, Premier Beehive, Creative Food Solutions, Great Southern, AMH, Red Gum Creek, Beef City, Pure Prime, Queenslander, Right to Roam, Riverina Beef, Yardstick, Tajima, Hans, Tender Valley, Knox International, White Stripe Foods and Riverview Farms (collectively, "**JBS Australia**").

1.2 We are committed to respecting your privacy.

2. SCOPE

2.1 This Policy is JBS Australia's privacy policy, privacy notice and credit reporting policy as required by Australia's Privacy Act 1988 and the Australian Privacy Principles ("**Australia's Act**"), as well as New Zealand's Privacy Act 2020 and its Information Privacy Principles ("**New Zealand's Act**"; collectively, the "**Acts**"). This Policy applies to all personal information (including Sensitive Information) about individuals collected by JBS Australia. This Policy may be supplemented by other documents that may seek your consent or notify you of how we use your personal information.

2.2 By providing your personal information to us, you consent to the collection, storage, usage, and disclosure of that personal information in accordance with this Policy and any other agreements that you have with us.

2.3 We may disclose to other entities your personal information for the purposes described in this Policy.

2.4 We will take reasonable steps to make sure that the persons and organisations that we disclose personal information to are bound to protect the privacy of that personal information. We cannot guarantee, although we will take reasonable steps to ensure, that recipients (including overseas recipients) handle that personal information in compliance with this Policy and Australian laws.

2.5 We may also disclose your personal information to a trusted third party who may combine it with other information they hold about you to develop anonymised consumer insights. We do this to better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

3. BACKGROUND ON COLLECTION OF PERSONAL INFORMATION

3.1 We collect personal information about individuals who are, or are employed by, our customers, suppliers, consultants, service providers, contractors, related companies, agents and other third parties such as job applicants. The types of personal information that we will collect from you differs depending on the nature of our relationship with each other.

3.2 Some information provided to us by suppliers, customers and other parties might be considered private, personal or sensitive. However, without such information we would not be able to carry on our business and provide our services. We will only collect such personal information and/or Sensitive Information (see paragraph 3.3 below for definition) if it adds substantial value or is necessary for one of our functions or activities.

3.3 "Sensitive Information" is a subset of personal information and is defined as information or an opinion about an individual, such as: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association membership of a trade union; sexual preferences or practices; criminal record; or health information.

3.4 Prior to the collection of Sensitive Information about an individual, JBS Australia will take reasonable steps to ensure that: (i) the individual is adequately informed as to the reason for the collection of the Sensitive Information; (ii) the individual has the capacity to understand and communicate their consent; and (iii) the consent is voluntarily given by the individual.

3.5 If the individual is under the age of 18 years old, JBS Australia will only collect Sensitive Information about the individual if the individual's Legal Guardian/s has/have provided their express written consent on behalf of the individual.

4. WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT?

4.1 Types of personal information that we may collect from you may include (but is not limited to):

- your name, age, gender, ethnicity, nationality, date of birth, address, email address and other contact details;
- identification information including video and/or photo identification, including biometric data such as facial recognition data and fingerprint data;
- academic history, employment history;
- Tax File Number and other tax related information;
- Medicare and health information, including:
    - details of any medical conditions or disabilities;
    - prescribed medications;
    - prescribed therapies;
    - assistance required;
    - medical procedures;
    - injury reports, etc;

- criminal history;
- directorships, shareholding and other positions held;
- financial information, including information about transactions and trading history with JBS Australia;
- all information in your credit application and your credit card information;
- geolocation of your property, livestock and general whereabouts of JBS Australia's supply chain;
- the details about the products and services that we have provided to you or that you have enquired about;
- all information that you provide through surveys, interviews and other means;
- any information that you may disclose to us using a free text field; and
- all other information that may be required for us to be able to effectively do business with you or manage the employee lifecycle.

5. SPECIFIC EXAMPLES

5.1 In particular, JBS Australia collects personal information (including Sensitive Information) for several specific purposes, including (but not limited to):

- if you complete an Application for Employment, Pre-Employment Medical form, or any other form required to be completed by you to enable and/or facilitate services and/or employment to be provided by JBS Australia. If you apply for a job with us, we may also collect information about your work history and, where applicable, criminal and other history checks, information from a recruitment consultant, information from previous employers and anyone else who may be able to assist us to decide whether to employ you or enter into a contract with you;
- health information provided by you to enable and/or facilitate services or employment to be provided by JBS Australia;
- if an incident occurs on a JBS Australia site or in relation to a JBS service or product that requires investigation;
- if you provide emergency contact details to JBS Australia;
- if you contact JBS Australia, we may keep a record of that communication or correspondence;
- when applying for and/or establishing and/or accessing an account with us or ordering products or services from us;
- when conducting certain types of transactions such as cheque or credit card purchases or refunds;
- when you submit your contact details so that you may be included on our mailing lists or newsletters;

- when an order is placed with us to purchase goods, we may require you to provide us with contact information including an individual's name, address, telephone number and/or email address and financial information (such as credit card details) for the purposes of processing and fulfilling such an order;

- enable you to participate in any campaigns, competitions or giveaways we may conduct;

- process any contact or communication you have made to us through our website, social media platforms or through our enquiry lines (including any complaints or feedback);

- where your geolocation is required for tracing JBS Australia products, including for the purpose of informing distributors, butchers, restaurants, and consumers of the source of the JBS product such as in the case of King Island Beef products;

- when you submit a report to us via Ethics Line, including for the purpose of whistleblowing or making any complaint;

- when you submit feedback or reports to us via our food quality and other feedback channels;

- at expos (e.g. food or career expos), conferences and other events for the purpose of contacting you after the event; and

- where video and camera footage, photos or other images (e.g. CCTV, drone or dashcam footage) are recorded at JBS Australia's sites, facilities, premises or controlled premises, or otherwise recorded in connection with JBS Australia's operations. Specifically, the use of CCTV footage may leverage on Artificial Intelligence (AI) capabilities and/or the use of facial recognition technology.

6. WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

6.1 We collect your personal information to fulfil certain purposes, including (but not limited to):

- to do business with you;
- allow us to employ, assist or do business with you;
- allow you to use, communicate and/or view information in connection with our services, website, social media and other platforms;
- operate, protect, and improve our website, business and your experience with us;
- send you marketing messages and other information that we think you may find interesting. This will either come from us or our business partners;
- provide rewards, surveys, contests, promotions or events, either sponsored or managed by us or our business partners; and
- comply with our legal obligations, resolve disputes with users, and enforce our agreements with third parties.

6.2 If you choose to remain anonymous in your dealings with us, or not to provide your personal information, then we may not be able to employ, assist or do business with you.

7. WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO?

7.1 From time to time, we may need to disclose your personal information to third parties, including (but not limited to) the following:

- our team members and team members of our related companies;
- third party suppliers and service providers (e.g. our website operators, third party agents who manage our social media platforms and activities);
- our third-party agents who manage our social media platforms and activities;
- the relevant internal personnel where required to respond to any feedback, complaint or other contact you have made (or who should reasonably receive it);
- the relevant internal personnel where required to process your job application;
- sponsors, promoters or any other relevant personnel who facilitate any competition or giveaway you have indicated that you would like to be a part of;
- professional advisers, dealers and agents;
- payment systems operators (e.g. merchants receiving card payments);
- anyone to whom our assets or businesses (or any part of them) are transferred;
- JBS SA and its subsidiaries and related entities, including overseas entities;
- specific third parties authorised by you to receive information held by us;
- other persons, including government agencies and regulatory bodies, or as required, authorised or permitted by law; and/or
- other entities that you have otherwise consented.

8. WE DISCLOSE PERSONAL INFORMATION OUTSIDE AUSTRALIA

8.1 JBS Australia may be required to send your information overseas to third party service providers and/or members of the JBS SA Group. You consent to your personal information being disclosed outside of Australia to related overseas entities (including entities in Brazil and USA), for data storage and to our other service providers.

9. OUR WEBSITE, DIRECT MARKETING

9.1 We may collect personal information from you, or from third parties, such as when you register on our website, communicate with us, interact with our website, services, content and advertising or apply for a job with us.

9.2 We do not use browsing information to identify you personally. However, we may aggregate your personal information with that of other users of our website, such

as the pages you visit, the time and date you visited and your IP address, for internal traffic monitoring and to improve the services and content of our website.

9.3 We may also use 'cookies' on our website to help us track your website usage and remember your preferences. You can disable cookies through your internet browser. However, please note that this may have an impact on the functionality of the website.

9.4 You may opt-out of receiving direct marketing materials from us by contacting us, or by using the opt-out facilities provided (e.g. through an unsubscribe link).

9.5 Our websites may contain links to other websites not maintained by us. JBS Australia is not responsible for the privacy practices or the content of such other websites. If you provide any information to parties who operate websites that are linked to or from our websites, different rules may apply to their collection, use or disclosure of your personal information. We encourage you to review these websites' policies before revealing any personal information. To the fullest extent permitted by law, JBS Australia will not be liable for any use of such websites.

10. SECURITY AND PROTECTING PERSONAL INFORMATION

10.1 We hold your information in hard copy or electronic format, and keep it in servers or other types of storage facilities that we own and operate ourselves, or that are owned and operated by our service providers such as servers, hard drives, applications and on the cloud. Where this occurs, we take steps to protect personal information.

10.2 We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example, we hold personal information on our main server and access is password protected, and we also use methods of data encryption. We remind you, however, that the internet is not a secure environment and although all care is taken, we cannot guarantee the security of information you provide to us via electronic means.

10.3 Your personal information is kept for as long as it is required for the purpose for which it was obtained or as otherwise required by law. We take appropriate measures to destroy or permanently de-identify this information when its retention is no longer required. The types of measures we take vary with the type of information, and how it is collected and stored.

11. NOTIFIABLE DATA BREACH SCHEME

11.1 In the event that there is unauthorised access to, or disclosure of your personal information, or personal information is lost in circumstances where unauthorised access to, or disclosure of the information is likely to occur (Data Breach), and this is likely to result in serious harm to you or us, we will investigate and assess this Data Breach, in accordance with the Privacy Act. If required under the Act, we will notify you and the Information Commissioner of the Data Breach and will take all reasonable steps to mitigate any possible harm you may suffer.

12. HOW DO WE MANAGE YOUR CREDIT-RELATED PERSONAL INFORMATION?

i. What credit-related personal information do we collect?

The main type of credit-related personal information (as defined in the Privacy (Credit Reporting) Code (***CR Code***)) that we collect and use is your identification information. However, through providing goods and services to you, we may receive other types of credit-related personal information including:

- your name, contact details, and payment history;
- a statement that an 'information request' was made about you to a credit reporting body (***CRB***);
- publicly available information about your credit worthiness;
- any opinion of a credit provider that you have committed a serious credit infringement or fraud;
- commercial credit reports from a CRB;
- your monthly purchase amounts with us; and
- your administrative credit information, such as account and customer numbers.

We may collect personal information from, or relating to your dealings with, other credit providers (e.g. banks, financial institutions, or organisations that may provide you with credit in connection with their products or services), who have collected that information from a CRB. This information may affect your credit worthiness.

ii. How do we collect credit-related personal information?

We usually collect credit-related personal information about you if you disclose it to us and it is relevant in providing you with our goods or services.
We may also collect it from other sources including:

- banks and other credit providers;
- other individuals and entities via trade references (i.e. your suppliers and creditors);
- government bodies;
- CRBs; and
- publicly available information.

iii. Limited to credit-related personal information about an entity

We do not specifically collect credit reports about individuals from CRBs. However, we may obtain credit-related personal information about individuals such as proprietors, directors and sole traders when we request credit-related personal information from a CRB about an entity applying to us for commercial credit.

iv. How do we store credit-related personal information?

We hold your credit-related personal information in accordance with section 10 of this Policy.

v. Why do we collect credit-related personal information?

We use your credit-related personal information for the purposes listed in section 6 of this Policy, as well as other purposes, including:

- assessing your application for commercial credit, and your credit worthiness;
- collecting payments;
- exercising our rights and obligations, including where you are in default with other credit providers;
- reporting details of fraud or other serious credit infringement; and
- dealing with credit-related complaints or regulatory matters.

This includes exchange of credit-related personal information with other credit providers and trade referees listed in your application or in reports provided by a CRB.

vi. Do we disclose your credit-related personal information to CRBs?

If you apply for any kind of credit, to the extent allowed under either of the Acts and/or the CR Code, we may provide your credit-related personal information to, or collect information about you from, a CRB. A CRB may then provide that information to other credit providers to assist them to assess your credit worthiness. If you commit a serious credit infringement, we may be entitled to disclose this to a CRB.

We use credit reporting services who are required to comply with applicable laws and regulations in relation to the management of credit reporting information,

These CRBs may include credit reporting information provided by credit providers (such as us) in reports to assist in the assessment of credit worthiness. Each CRB may use credit reporting information they hold about you for "pre-screening" for direct marketing. You have the right to request that they not use the credit reporting information for pre-screening purposes. You can also request that they not use or disclose the information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

vii. Do we disclose credit-related personal information outside Australia?

We may disclose your credit-related personal information in accordance with sections 7 and 8 of this Policy, to the extent we are allowed to by law.

viii. How can you access or correct your credit-related personal information?

You can access and correct your credit-related personal information, or complain about a breach of your privacy in accordance with sections 14 and 15 of this Privacy Policy.

13. AUTOMATED DECISION-MAKING TECHNOLOGY

13.1 We do not authorise the use of any automated decision-making technology. If we start to authorise the of use automated decision-making, we will update this Policy accordingly.

14. HOW CAN YOU ACCESS OR CORRECT YOUR PERSONAL INFORMATION?

14.1 You can request access to the personal information (including credit-related personal information) we hold about you by contacting us using the details set out in section 17 of this Policy. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why.

14.2 If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

14.3 Depending on the nature of the request, we may charge for providing access to your personal information. However, any charge will not be excessive.

15. COMPLAINTS HANDLING

15.1 If you believe that your privacy may have been infringed by JBS Australia, you have the right to make a complaint about the matter by contacting our Privacy Officer at the contact details below. Please include your name, email address and/or telephone number and clearly describe your complaint. JBS Australia will investigate the complaint, respond to you promptly and attempt to resolve it.

15.2 If JBS Australia receives a request in writing from you seeking resolution of a dispute concerning one of its acts or practices in relation to credit reporting it must respond to you, in writing, within 30 days of receipt of the request.

15.3 If you are dissatisfied with JBS Australia's handling of the complaint, or the outcome, may take their complaint to the Office of the Australian Information Commissioner ("**OAIC**") or the New Zealand Office of the Privacy Commissioner ("**OPC**").

15.4 Further information is available by contacting:

- Australia: the OAIC at 1300 363 992 or at http://www.oaic.gov.au/about-us/contact-us-page; or
- New Zealand: the OPC at 0800 803 909 or at https://www.privacy.org.nz/about-us/contact-us/.

15.5 We will endeavour to handle complaints in a timely, effective, fair and consistent manner. We may need to consult with a CRB or another credit provider depending on the nature of your complaint and whether we consider it necessary in order to investigate and deal with your complaint.

15.6 If you think that we have failed to resolve a complaint satisfactorily, we will provide you with information about the further steps you can take.

16. AMENDMENTS

16.1 We may change this Policy from time to time by publishing it on our website and anywhere else we consider appropriate.

17. CONTACT US

17.1 For further information about our Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

By email:	legal@jbssa.com.au
By telephone:	+61 7 3344 0000
By post:	Privacy Officer, GPO Box 2473 BRISBANE QLD 4001

17.2 Alternatively, you can lodge a report via Ethics Line, which provides the option of making such a report anonymously (if you prefer):

Australia Phone:	1800 462 104
New Zealand Phone:	0800 715 000
Online:	jbsethicsline.jbssa.com

CHANGE LOG

Name	Date	Change	Reason
Angela Rye	29 January 2025	New policy	New policy created.
Angela Rye	2 July 2025	Minor amendments	Amendment of 4.1 to include other surveys and references to the employee lifecycle.