



PRIVACY POLICY

TOP CUT FOODS AUSTRALIA and SUBSIDIARIES

(‘Top Cut Foods/We/Us/Our’)

Effective Date: 15th August 2025

1. Introduction & Scope

At **Top Cut Foods Australia** ("Top Cut," "we," "us," "our"), your privacy matters. This policy outlines how we manage Personal Information across our group of companies and is compliant with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**.

2. Objectives

We aim to:

- Uphold privacy standards for handling personal information;
- Demonstrate accountability for privacy protection;
- Clarify collection, use, disclosure, storage, and handling of personal data;
- Explain how individuals may access or correct their data;
- Provide avenues to make privacy-related complaints; and
- Ensure compliance with the obligations under the Privacy Act .

3. Who We Are

Top Cut Foods Australia operates as a processor, value-adder, exporter, wholesaler, and feed lotter within the meat and food products sector. We have facilities located in Yatala and Currumbin Queensland, Marrickville and Sandgate New South Wales, Laverton North Victoria, Wingfield South Australia, Bibra Lakes Western Australia and Tokyo, Osaka, Fukuoka, Nagoya and Sapporo Japan, serving both domestic and international markets.

4. Types of Personal Information Collected

We may collect personal information relating to:

- **Suppliers and Contractors:** Names, contact details, financial/account information, and details about delivered products, enabling payment and quality tracking.
- **Customers:** Contact and payment details; creditworthiness data where applicable.
- **Prospective Employees:** Data collected through third-party HR platforms as part of recruiting and hiring processes.
- **Employees:** Employment-related records, where not exempt under the APPs.
- **General Public & Inquiries:** Information provided during inquiries, complaints, or access/correction requests.
- **Website Users:** IP addresses, browser/device info, cookies, and usage analytics.

5. Collection Methods

We generally collect information directly from you. However, we may also gather information from:

- Public sources (e.g., business records, directories);
- Referees and third parties (with your consent);
- Website interactions (via cookies, logs, analytics)

6. Sensitive Information

Occasionally, sensitive information (e.g., health data) may be collected—for instance, for workplace safety. Such data will be collected only when necessary, and with consent where required .

7. How We Use Personal Information

We use your data to:

- Conduct business operations, including processing inquiries, managing credit, and registering security interests;
- Obtain credit reports when applicable;
- Maintain internal systems and infrastructure;
- Avoid direct marketing and limit use to operational necessities .

8. Disclosure of Personal Information

We may share your data with:

- Affiliated group entities;
- Service providers (e.g., logistics, payroll, professional advisors);
- Government, regulatory, or law enforcement bodies as required or authorized by law;
- Emergency services if needed to protect health or safety .

We do not sell personal data for third-party marketing purposes.

9. Storage and Security

Your information is stored in secured formats—both electronic and paper. We implement training and information security measures to prevent misuse, interference, or unauthorized access . Records are generally retained for up to **7 years**, after which they may be de-identified or destroyed .

10. Accuracy of Information

We take reasonable steps to ensure your information is accurate, complete, and up to date. Corrections are made promptly when identified by you or discovered by us .

11. Access and Correction Rights

You may request:

- Access to personal information we hold about you;
- Correction of inaccurate or incomplete information.

We will respond within a **reasonable timeframe** (typically 30 days). Access may incur a nominal charge for administrative costs, and refusal will include reasons and information about complaint options .

12. Anonymity & Pseudonymity

You may choose to remain anonymous or use a pseudonym when interacting with us, where feasible. However, we may need to identify you in contexts such as enforcing contracts or handling complaints .

13. Complaints Process

If you believe we have breached the APPs, submit a complaint to our Privacy Officer in writing. We aim to respond within 30 days. If unsatisfied, you may escalate to the **Office of the Australian Information Commissioner (OAIC)** .

14. Contacting Our Privacy Officer

Privacy queries or complaints can be directed to:

Privacy Officer

Top Cut Foods Australia
18 Motorway Cct,

Ormeau QLD

Email: customer.service@topcut.com.au

Phone: 1300 867 288

15. Policy Updates

We may update this policy to reflect legal, operational, or technological shifts. Updates will be available on our website, and significant changes will be communicated proactively.