



PRIVACY POLICY

Our privacy commitment

End Food Waste Australia Limited (EFWA) (ABN 90 627 226 537) (we, us and our) is committed to handling personal information in accordance with this Privacy Policy, the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) and other applicable laws.

This Privacy Policy applies across EFWA: our websites and digital services, events, research and industry activities, campaigns, communications, and the EFWA Members Portal (Portal). It explains how we collect, hold, use and disclose personal information, including when you create or use a Portal account or make a payment.

The Portal also holds information about companies and other entities that is not personal information. This Privacy Policy applies to that information only where it is or includes personal information about an identified or reasonably identifiable individual, such as a named business contact or authorised Portal user.

We may update this Privacy Policy to reflect changes to our activities, systems, legal obligations or service providers. The current version is published on our website and made available through the Portal.

Employee Records

The Privacy Act contains an exemption for an organisation's handling of an employee record where the act or practice is directly related to a current or former employment relationship with the individual. EFWA relies on that exemption, so this Privacy Policy does not apply to employee records we hold about our current and former employees to the extent the exemption applies. We continue to handle those records confidentially and in accordance with our employment policies and our obligations under workplace, work health and safety, taxation and superannuation laws.

This Privacy Policy does apply to personal information we hold about job applicants, contractors, consultants, volunteers and directors, and to information about our people that is not an employee record or is not handled in a way that is directly related to their employment relationship with us.

What is personal information and sensitive information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether it is recorded in a material form or not.

Depending on how you interact with EFWA, the personal information we collect and hold may include:

- identity and contact information, such as your name, postal address, telephone number and email address;
- professional and organisation information, such as your employer or organisation, job title, role, industry, research interests and professional capabilities;
- Portal organisation and business contact information, such as company name, ABN, company address, contact person name and work email address;
- transaction and billing information needed to administer payments, invoices, receipts and refunds, including the cardholder's name, the card brand and funding type, the last four digits of the card, the card expiry date, a card fingerprint, a payment token and a transaction reference provided by our payment processor. Full card numbers and card verification values are not stored by EFWA;
- online and technical information, such as IP addresses, device and browser information, cookies and similar identifiers, login times, pages or resources accessed and other Portal or website activity;
- communications and engagement information, such as emails, enquiries, support requests, survey responses, event registrations and meeting records;
- photographs, audio or video recordings where relevant to events, meetings, research or communications;
- research, program, campaign or project information where it relates to an identifiable individual;
- recruitment, employment, contractor, supplier and service provider information; and
- other personal information reasonably necessary for our functions and activities.

Sensitive information includes personal information about a person's racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practices, criminal record, health or genetic information, and certain biometric information.

We do not seek sensitive information unless it is reasonably necessary for our functions or activities and we have the individual's consent, or the collection is otherwise permitted or required by law. We deal with unsolicited sensitive information in accordance with the APPs, including by destroying or de-identifying it where required.

Whose personal information do we collect?

We collect personal information from people connected with our operations and activities. This may include industry members and partners and their employees, representatives and authorised Portal users; research participants, researchers and collaborators; recipients of our services, resources and support; participants in campaigns, events, webinars, surveys and food waste promotion activities; consumers and members of the general public; employees, job applicants, contractors, volunteers and directors; suppliers, professional advisers and other service providers; and government, philanthropic, funding and stakeholder representatives.

How do we collect your personal information?

Where possible, we collect your personal information directly from you: in person at an EFWA event; online when you register for an event or webinar, download resources, complete a form or survey, subscribe to a newsletter, or create or use a Portal account; by telephone, in written

forms or by email; or through platforms we licence such as Zoom or Microsoft Teams. We will let you know before a session is recorded.

We collect limited technical information automatically when you use our websites or the Portal, as described under Website and Portal usage, cookies and analytics. Card details are provided directly to Stripe, as described under Payments and payment card information.

We also obtain personal information from third parties such as contractors, industry organisations, research partners, associations and community groups, and for the Portal from your organisation or its authorised representative. If it is unclear whether you consented to that disclosure, we will take reasonable steps to make you aware of the circumstances of collection and the purposes for which we collected it.

Collection notices

When we collect personal information, we take reasonable steps to tell you why we are collecting it, how it may be used or disclosed, what may happen if you do not provide it, and how you can access, correct or complain about our handling of it.

We may provide this information on a form, website or Portal page, by email, verbally, or by referring to this Privacy Policy.

Portal accounts and organisation administrators

The organisation and business contact information EFWA stores in the Portal are the company name, ABN, company address, and the contact person's name and work email address. The Portal also generates account, activity and transaction records as described above. It does not store card numbers or card verification values.

We use this information to identify the organisation and its nominated contact, administer access to Portal services, communicate about its membership or services, provide support and maintain business records.

Where your organisation holds the membership and you use the Portal as its representative, its administrator may see your account details and Portal activity that relate to that organisation's membership or services, add and remove users, and ask us to close or transfer access.

Industry data, benchmarking and reporting

Members and signatories submit information about their organisation's food waste — through the Portal, through tools such as the Cost-of-Waste Calculator, and through annual reporting. Most of that information is about a business rather than an individual, and the Privacy Act does not apply to it.

Some of it is personal information, and we handle that under this Privacy Policy:

- the name, work email address and organisation of the person who submits or approves a return, together with what they submitted and when; and
- information about a member that is a sole trader, or whose business is identifiable with a particular individual.

We use this information to give your organisation its own results and insights, to prepare the reports we provide back to your organisation, and — where you have agreed — to include your figures in aggregated benchmarks.

Aggregated and published reporting. We publish cohort and industry-level reporting, such as sector impact reports. Before publishing we aggregate results so that an individual business or person cannot be identified, and we will not publish a cohort that is too small for that to hold. Where you have agreed to your figures being included in a benchmark, you may withdraw that agreement at any time by contacting us and we will exclude them from future reporting.

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

We collect, hold, use and disclose personal information where reasonably necessary for our functions and activities, including:

- provide, administer and improve EFWA services, memberships, industry packages, resources, projects and the Portal, including managing user accounts, verifying identity and authority, administering access and providing support;
- process payments, invoices, receipts and refunds, and maintain accounting and audit records;
- communicate with members, partners, users and stakeholders about services, obligations, resources, projects and events;
- conduct and support research into food loss and waste and develop evidence, tools and industry insights;
- deliver campaigns, education and industry action, and manage events, surveys, consultations, volunteering and stakeholder engagement;
- analyse use of our websites, Portal and services, and monitor and improve performance;
- protect the security of our systems and prevent or investigate misuse, fraud, cyber incidents or unlawful activity;
- manage recruitment, employment, governance, suppliers, contractors and professional services; and
- meet contractual, legal, regulatory, funding, reporting, insurance, audit and governance obligations, and manage disputes, complaints and legal rights.

We generally use or disclose personal information for the primary purpose for which it was collected. We may also do so for a related secondary purpose you would reasonably expect, with your consent, or where otherwise permitted or required by law.

What happens if you don't provide all this information?

If you do not provide some or all the personal information requested, we may not be able to provide you with Portal access, process payment, offer services, conduct research, or provide you with information about our campaigns, events, programs and projects.

Using a pseudonym or engaging with us anonymously

Where it is lawful and practicable, you may deal with us anonymously or using a pseudonym. You do not need to identify yourself to browse our website, access publicly available resources, make a general enquiry, or complain about our handling of personal information, although anonymity may limit our ability to respond. Identification is necessary for Portal, membership, payment, contractual, employment, research and account administration activities, because we need to know who you are or which organisation you represent.

Payments and payment card information

The Portal allows fees and other amounts to be paid electronically using Stripe as EFWA's payment processor. Card details are entered into and processed by Stripe, which may collect the cardholder name, card number, expiry date, card verification value, billing details and other information required to authorise the payment.

EFWA does not store full card numbers or card verification values (CVV/CVC). We receive from Stripe the confirmation and transaction information we need to issue receipts, reconcile payments, process refunds and meet accounting, audit and legal obligations. This typically includes the cardholder's name, the card brand and funding type (credit, debit or prepaid), the last four digits of the card, the card expiry date, a card fingerprint that lets us recognise the same card across transactions without seeing its number, a payment token and a transaction reference.

Stripe handles card information under its own privacy policy and payment card industry compliance arrangements. Stripe may retain certain payment-related personal information for its own legal, regulatory and record-keeping purposes. EFWA may not be able to require Stripe to delete information that Stripe is required or permitted by law to retain. Stripe may process payment related personal information outside Australia, as described under Cross border disclosures below.

Website and Portal usage, cookies and analytics

When you access our websites or the Portal we use cookies and similar technologies to operate the service, keep you signed in, remember preferences, protect security, and understand and improve how the service performs.

The information collected may include IP address, browser and device information, online identifiers, session and referring page information, pages or resources viewed, transaction activity and dates and times. Depending on the circumstances and whether it can be linked with other information, some of this may be personal information, and where it is we handle it under this Privacy Policy.

We use Google Analytics and Google Tag Manager. Where we use advertising or social media pixels, the provider receives online identifiers and information about your activity and handles it under its own privacy policy, generally outside Australia. We identify these technologies, and provide controls over them, in the cookie notice on our websites and Portal.

You can manage cookies through your browser settings and through the cookie controls on our websites and Portal. Blocking some cookies may affect functionality. Google also provides

advertising settings and a Google Analytics opt-out browser add-on.

Direct marketing communications

We may use personal information to tell you about EFWA resources, services, events, memberships, campaigns and projects where we have your consent or are otherwise permitted by law. We may contact you by email, telephone, post, SMS or other electronic communication. We group members by membership type and by business type so that what we send is relevant to you, and some of these communications are sent automatically.

Commercial electronic messages will be sent in accordance with the Spam Act 2003 (Cth). Messages will identify EFWA, include current contact details and provide a clear, free and functional way to unsubscribe. We will action electronic unsubscribe requests within the period required by law, generally within five (5) working days.

You may opt out at any time using the unsubscribe function or by contacting us; service, account, payment and legal communications may still be sent. If you ask, we will tell you where we obtained your contact details, unless it is impracticable or unreasonable to do so.

To whom do we disclose personal information?

We may disclose personal information where reasonably necessary for our functions and activities, including:

- technology and digital service providers, including hosting, cloud, software, Portal development, cyber security, database, IT support, email, communications, survey, analytics and event platform providers;
- payment processors, banks, financial institutions and accounting or billing service providers;
- industry and research partners, project participants, funders and service delivery partners, where the disclosure is necessary for the activity or you would reasonably expect it;
- lawyers, auditors, accountants, insurers, consultants, other professional advisers, and contractors and other service providers acting on our behalf;
- government agencies, regulators, law enforcement bodies, courts or tribunals where required or authorised by law; and
- other people or organisations with your consent or where otherwise permitted or required by law.

We do not sell personal information, and we will not disclose your contact details to another organisation for its own direct marketing unless we have your consent or the disclosure is otherwise permitted by law.

We take reasonable steps to ensure that contractors and service providers handling personal information on our behalf have appropriate privacy and security obligations, including through contractual arrangements where appropriate.

Cross-border disclosures of your personal information

EFWA uses data hosting facilities and third-party service providers, so personal information may be disclosed to, stored by or accessed by overseas recipients. Based on our current

arrangements, these recipients are likely to be located in New Zealand, the Netherlands, Canada, the United Kingdom, the United States of America and Ireland. They include overseas cloud, technology and payment processing providers, including Stripe and its affiliates.

Where APP 8 applies, we take such steps as are reasonable in the circumstances to ensure the overseas recipient does not breach the APPs in relation to that information, unless an exception under the Privacy Act applies. We do this principally through contractual obligations and by assessing privacy and security arrangements when selecting and managing service providers. If an overseas recipient mishandles information we disclosed to it, you may complain to us and to the Office of the Australian Information Commissioner.

How do we protect personal information?

We take reasonable steps to protect personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. In accordance with APP 11, those steps include appropriate technical and organisational measures having regard to the nature of the information, our activities, the risks involved and the systems and service providers we use.

These measures include access controls and authentication, encryption in transit, secure configuration and software updates, logging and monitoring, backups, staff training, documented procedures, physical security, incident response, and due diligence and contractual controls over service providers. No method of electronic transmission or storage is completely secure, but we review our safeguards regularly and update them where appropriate.

Retention, destruction and de-identification

We retain personal information only for as long as it is needed for a purpose for which it may be used or disclosed under the APPs, or for as long as an Australian law or a court or tribunal order requires us to keep it. Different categories are kept for different periods; financial and transaction records, including payments and tax invoices, are generally retained for seven years.

When personal information is no longer required and no retention obligation applies, we take reasonable steps to destroy it or ensure it is de-identified, across electronic and hard copy records.

Data breaches

EFWA maintains processes for responding to suspected or actual data breaches. Where we suspect an eligible data breach, we assess the circumstances promptly in accordance with the Notifiable Data Breaches scheme under the Privacy Act. Where notification is required, we notify the Office of the Australian Information Commissioner and affected or at-risk individuals as soon as practicable, with the information the law requires.

Access to your personal information

You may request access to personal information we hold about you. Subject to the Privacy Act and any applicable exceptions, we take reasonable steps to provide access in the manner requested where it is reasonable and practicable. We generally respond within 30 calendar days.

We may refuse access in some circumstances, including where it would have an unreasonable impact on another person's privacy, would be unlawful, would prejudice certain legal or enforcement activities, or another exception under the Privacy Act applies. If we refuse, we will provide reasons where required and explain available complaint mechanisms.

We do not charge a fee for making an access request. Where permitted by law, we may charge reasonable costs associated with providing access, but any charge will not be excessive, and we will tell you what it is before we incur it.

Correction and deletion requests

You may ask us to correct personal information we hold about you if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading. We take reasonable steps to verify your identity before providing access or making a correction.

You may also ask us to delete personal information. The Privacy Act does not create a general right to deletion, and we may need to retain information to meet legal, contractual, accounting, audit or security obligations. Where we no longer need it and no retention obligation applies, APP 11 requires us to take reasonable steps to destroy or de-identify it. We will explain how we have responded to your request, including what information has been deleted or de-identified and what information we must keep.

If we refuse a correction request, we will provide reasons where required and explain available complaint mechanisms. You may ask us to associate a statement with the information recording that you believe is inaccurate, out of date, incomplete, irrelevant or misleading.

Automated decision making

Some decisions in the Portal are made by computer programs using personal information, without a person reviewing them. Where such a decision could reasonably be expected to significantly affect your rights or interests, we tell you about it here.

The personal information used in the operation of these programs includes your name and work email address, your organisation's name, ABN and business type, your membership type and status, and your payment and transaction status.

Decisions made solely by the operation of a computer program are:

- approving or refusing an application for \$500 Associate Membership, based on whether the registration information submitted satisfies the relevant eligibility requirements and payment is completed; and
- suspending or restricting access to the Portal where a payment fails or a membership lapses.

Our payment processor also carries out automated fraud and risk screening and may decline payment on that basis. If your payment is declined, you can try another card or contact us and we will arrange an alternative payment method where available.

No other decisions are made by, or substantially and directly assisted by, a computer program. All other membership applications are reviewed by our staff, and you choose your own membership tier and package — no computer program scores, ranks or recommends an outcome for our staff to confirm.

If an automated decision affects you and you believe it is wrong, please contact our Privacy Officer using the details below and a person will review it.

Complaints

If you have a question or wish to make a complaint about this Privacy Policy or how we handle personal information, please contact our Privacy Officer using the details below. You may make a complaint anonymously, although this may limit our ability to investigate and respond.

We acknowledge complaints within five (5) business days, and our Privacy Officer will respond within thirty (30) calendar days of receipt. If we need longer, we will tell you why and when you can expect a response.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au, by telephone on 1300 363 992, or by post to GPO Box 5288, Sydney NSW 2001.

How to contact us

Privacy Officer

End Food Waste Australia Limited
Level 1, Wine Innovation Central Building
Cnr Hartley Grove & Paratoo Road
Urrbrae SA 5064

Telephone: +61 8 8313 3564

Email: enquiries@endfoodwaste.com.au — please mark your email for the attention of the Privacy Officer

Version Control Table

Document Code	Version	Date Approved	Approver	Description of revision	Policy Owner	Issued	Next Review
EFWA-POLHR08-02	1	1/08/2024	CEO	Initial Version	CEO	24/11/2024	
EFWA-POLHR08-02	2	26/08/2026	CEO	Policy updated to cover the EFWA Members Portal, electronic payments, automated decision making and Australian Privacy Principles requirements.	CEO	01/09/2026	01/09/2027