**Privacy Policy**

**Privacy is important to us**

Elco Food Pty Ltd (ACB 50090288049) and its related companies together (Elco Food) is committed to protecting your personal privacy.  This Privacy Policy tells you how we collect, use, distribute and protect your personal information.  We encourage you to read this policy carefully so that you understand our information handling practices.

**Our Privacy Principles**

Elco Food is bound by the National Privacy Principles (NPPs) in the Privacy Act 1988 (the Act).  We have adopted internal policies and procedures to ensure that personal information that we collect, store, use and disclose is dealt with in accordance with the NPPs.  You can see the full text of the NPPs online at[www.privacy.gov.au.](http://www.privacy.gov.au/)

**Your consent to this privacy policy**

By providing personal information, you agree with the terms of our current privacy policy.  If you do not agree with any term of this policy, please do not provide personal information.

**Information we collect**

In order to provide you with the products and services that you have requested, we may need to collect and use personal information about you and others.  If we are not provided with all the personal information we request, we may not be able to provide you with our products and services.  The type of information we collect and handle includes names, addresses, email addresses (if you buy products or services from us) and other contact details.  We may also collect details of the age, sex, hobbies and other personal information about you or others.

**Purpose of collection**

Whenever possible, we collect personal information directly from the individual concerned.

We collect personal information for the following purposes:

* to identify our customers, potential customers and their representatives;
* to inform you and others about offers or other benefits that may become available;
* to contact you and others directly about our brands, products, special offers, samples, competitions and other promotions;
* to seek your opinion or comments about our products and services;
* to carry out our management, administrative, quality assurance and complaint handling activities in a professional and efficient manner;
* to develop and implement initiatives to improve our services;
* to conduct consumer and market research;
* to follow up or pursue any queries you make.

The personal information of our customers or their representatives will usually be recorded or up-dated on our computer database.

Any additional purpose for the collection (not included in this policy) will be identified when we collect the personal information, or as soon as practicable afterwards.

**Use of personal information**

We use personal information:

* to confirm your identity;
* to improve our services to you or others;
* to promote and market our products and services;
* to keep you or others informed of our offerings and news about our products and services;
* or the purpose for which it was collected, or for a related purpose that the individual concerned would reasonably expect from us;
* for other purposes permitted, required or authorised by or under law; and
* for any other purpose, where an individual has consented to its use for that purpose.

**Disclosure**

Except where indicated above, we will not disclose personal information to a third party or a supplier that is not a related entity unless:

* the disclosure is for a primary purpose for which the information was collected;
* the individual concerned has consented to the disclosure;
* the third party is our agent, service provider or contractor, in which case we will require them to disclose and to use the personal information only for the purpose for which it was disclosed;
* the third party is a person involved in a dealing or proposed dealing (including a sale) of all or part of our assets and business;
* the third party is a credit reporting agency, your creditor, banker, financier, credit provider, mortgage insurer or trade insurer;
* the disclosure is to a related body corporate, suppliers or business partner; or
* the disclosure is permitted, required or authorised by or under law.

**Website & cookies**

To ensure we are meeting the needs and wants of our website users, and to develop our online services, we may collect aggregated information by using cookies or similar electronic tools

Cookies are unique identification numbers like tags that are placed on the browser of our website users.  The cookies do not in themselves identify users personally, but are linked back to a database record about them.

We do not use this technology to access any other personal information of a user in our records and a user cannot be personally identified from a cookie.

**Marketing**

We may use personal information to advise the individual concerned of new products and services and marketing initiatives that we think may be of interest to them. This may include product or service offerings, newsletters and general information about Elco Food and or its products and brands.

Those who prefer not to receive information about our products and services can contact our Privacy Officer to be removed from the relevant circulation list.  Contact details for our Privacy Officer appear at the end of this policy.

We never disclose personal information to a third party for the purpose of allowing them to direct market their products or service to an individual, unless individuals have expressly consented to that disclosure.

We may require written confirmation of a request to be removed from our circulation list, for example where legislation requires us to provide particular communications to the individual concerned.

**Quality & correction**

At all times we strive to ensure that the information we hold about you is accurate, complete and up-to-date.  If at any time you believe the personal information that we hold about you is incorrect, incomplete or inaccurate, you should let us know.  We will use all reasonable efforts to correct the information.

If we consider that the personal information we retain does not require amendment, we will annotate the request on our files.

**Storage and security of personal information**

Access to personal information is limited to those who specifically need it to conduct their business responsibilities.

We take all reasonable steps to keep secure any personal information which we hold about you and to protect your personal information from loss, misuse or unauthorised alteration.  Any personal information you provide to us is stored on secured servers.  We also maintain physical security procedures to manage and protect the use and storage of proper records containing personal information.

Our employees are trained to handle personal information in accordance with the National Privacy Principles and Privacy Act and to respect the confidentiality of any personal information held by us.

**Access to Personal Information**

We will generally allow an individual access to any personal information that we hold about them on request - subject to any Restrictions on Access.  We will try to give the individual concerned access in a form and manner that suits their needs.

To request access please contact our Privacy Officer.  Contact details for our Privacy Officer appear at the end of this policy.

**Restrictions on Access**

If at any time you want to know what personal information we hold about you, you are welcome to request access to that information by contacting us at the contact details listed below.  However, where:

* the access impacts on the privacy of others;
* the request for access is frivolous or vexatious;
* there are existing or anticipated legal proceedings; or
* such access can be denied under law or by a law enforcement agency

we may not be able to provide you with access to the personal information we hold about you.  If we deny your request for access, we will let you know why.

**Charges for Access**

An individual will incur no charges for lodging a request to access personal information.  However, we may levy a reasonable charge for providing the access.  We will provide an estimate of any charge on request, or if it appears to us that the work will be onerous or otherwise warrants a charge.

**Overseas Transfer**

Generally, we will not transfer personal information outside Australia unless:

* we reasonably believe that the recipient of the information is subject to legal obligations that uphold principles for the protection and fair handling of personal information that are substantially similar to the principles contained in this policy; or
* we are given consent by the individual concerned to do so, expressly or by implication; or
* we are contractually required to do so; or
* the transfer is for the benefit of the individual concerned and it is not practicable for Elco Food to obtain their consent and if they were able to grant consent, they would be likely to give it.  In this instance we will advise the individual concerned to whom their information has been disclosed as soon as practicable.

**Changes to our Privacy Policy**

We may update or change this policy at any time.  When we do so, we will publish the current policy on our website.  The amended policy will apply between us whether or not we have given you specific notice of any change.

**Complaint Resolution**

We are committed to constantly improving our procedures so that personal information is treated appropriately.  If you feel that we have failed to deal with your personal information in accordance with the NPPs or this policy, please speak to us so that we have an opportunity to resolve the issue to your satisfaction.

The person to contact is our Privacy Officer, whose contact details appear at the end of this policy.

Our Privacy Officer will manage the following process for us to:

* listen to your concerns and grievances regarding our handling of personal information;
* discuss with you the ways in which we can remedy the situation; and
* put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

**Contact Information**

If you wish to access any personal information that we hold about you, or have a query about this policy, please contact our Privacy Officer:

Privacy Officer   
1380 Centre Road

Clayton, VIC 3168

Phone: +61 3 95437433

Fax: +61 3 95436682  
Email: sales@elcofood.coom.au