

Group Privacy Policy

1. Introduction

- 1.1 Collins Foods Limited ACN 151 420 781 and each of its owned or controlled entities (referred to as **Group, we** or **us**) are committed to protecting the privacy of individuals whose personal information we collect, use and disclose.
- 1.2 This Group Privacy Policy (**Policy**) explains how we handle personal information in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth); the General Data Protection Regulation (EU) 2016/679 (**GDPR**), the *Dutch GDPR Implementation Act 2018*, the *German Federal Data Protection Act 2017* and the *United Kingdom's Data Protection Act 2018*.
- 1.3 In most cases, the Group controls your personal information as the data controller.

2. Scope of policy

- 2.1 This Policy applies to all personal information collected by the Group.
- 2.2 It applies to everyone who has a current or past relationship with the Group, as either an employee, prospective employee, customer, supplier, service provider or contractor.

3. Collection of personal information

- 3.1 The Group will only collect personal information from you that we reasonably require for one or more business functions or activities, or where otherwise authorised to do so under relevant Privacy Laws and will do so by lawful and fair means.
- 3.2 Personal information collected by the Group will depend on what type of interaction you have with us. This may include the following:
 - (a) Contact information (name, email, phone number and address) relating to correspondence with the Group, for example to ask for information or make a complaint.
 - (b) Payment and transaction information, such as items purchased, date and time of your transaction, amount purchased, whether you used a particular coupon or deal, and payment information, such as your credit/debit card or gift card or loyalty program details, when you make an in-store or online purchase. We use this information to fulfill your order and complete your transaction, update your rewards, detect and prevent fraud, and to inform our advertising and marketing.
 - (c) When you apply to work with us, information required for assessing and progressing your employment application, e.g. your name, demographic information, contact details and information about your education and employment history.
 - (d) Where you use our Website, we will also collect your Internet Protocol (**IP**) address or Unique Device Identifier and other details about your usage of our Website.
 - (e) In some locations, we may offer free Wi-Fi services to our guests. Our Wi-Fi network providers may capture certain data from devices you connect to it. We may also enable Bluetooth or other technologies in our stores which enable us to detect the presence of your device in our stores or provide operational insights.

- (f) We operate Closed Circuit Television (**CCTV**) cameras at our premises. We retain images captured by our CCTV cameras for security purposes, and to assist us with any investigations relating to incidents or accidents at our premises.
- (g) We also collect audio recordings through our CCTV system, which may capture conversations or other sounds in the vicinity. The purpose of audio recordings is to enhance security and incident investigations.
- (h) We may also collect sensitive information from you, including health information, when you provide that information to us. For European based employees any such sensitive information would be collected for the purposes of carrying out employment rights and obligations.

4. Use of personal information

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

- (a) Contact you (including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner) in relation to your enquiry.
- (b) Respond to your feedback or complaint. This processing is necessary for the purposes of our legitimate interests of adequately handling the complaint or responding to the feedback, in order to uphold our relationship with customers.
- (c) Investigate and resolve any food safety, insurance or other claims that you are involved in including to establish, exercise or defend legal claims (including to safeguard our legal position and evidence). This processing is necessary for the purposes of our legitimate interests of adequately administering, investigating and resolving claims and to uphold our legal position.
- (d) Assess and progress your employment application, including conducting reference checks and any psychometric or other testing used as part of the recruitment process. This processing is necessary for the purposes of our legitimate interests of adequately assessing and progressing employment applications to assess whether you are suitable for the job you are applying for and to protect our company assets and other employees by ensuring that we employ suitable personnel.
- (e) Carry out our restaurant business and franchisor functions and activities, including meeting our legal and regulatory obligations. This processing activity is necessary for compliance with a legal obligation or our legitimate interests for complying with legislation and complying with requests of competent authorities or orders.
- (f) Improve the service we provide and also to let you know about promotions or products that may be of interest to you.
- (g) Provide you with relevant direct marketing materials with your consent when you use a website or mobile application or those of a third party.
- (h) Compile and analyse statistics and trends to support business activities.
- (i) Develop our products and for research purposes in the interests of improving our services and offering our customers tailored services.
- (j) Administer our share registry, including communications with our shareholders and receiving tax file number notifications from the Australian Tax Office. This processing is necessary for our legitimate interests of administering our share registry.

5. Disclosure of personal information

5.1 We may disclose your personal information to third parties, including:

- (a) Our franchisors, who will then use it in accordance with their privacy policies:
 - (i) KFC: www.kfc.com.au/privacy-policy; and
 - (ii) Taco Bell: www.tacobell.com.au/privacy-policy.
- (b) Our advisors, consultants and insurers.
- (c) Food safety authorities and health authorities, where relevant for the investigation of a food safety or health issue.

- (d) Third parties to help us improve our services to you by analysing our business practices, improving our products, and obtaining feedback.
- (e) Third party service providers that we use to help us conduct our business (including, without limitation, billing or data storage services, email filtering, virus scanning and other technology services providers, archival services providers, marketing and communications agencies and service providers).
- (f) Where we believe doing so is necessary to protect our business, our rights and property, or the rights, property, and safety of others. For example, we may disclose personal information to:
 - (i) prevent, detect, investigate, and respond to fraud, unauthorised activities and access, illegal activities, and misuse of our business;
 - (ii) prevent, detect, investigate, and respond to situations involving potential threats to you, us, or any other party; or
 - (iii) enforce, detect, investigate, and act in response to violations of our terms, agreements, or policies.

We may also disclose personal information related to litigation and other legal claims or proceedings in which we are involved, as well as for our internal accounting, auditing, compliance, recordkeeping, and legal functions.

- (g) Where you apply for employment with us, we may disclose your personal information to your referees and also to third party suppliers who help with our recruitment processes, such as recruitment agencies and organisations that conduct competency or psychometric tests. We may also disclose your personal information to law enforcement agencies to verify whether you have a criminal record, if relevant to the role.
- (h) In connection with the administration of our share registry, including third parties who assist with our investor relations analysis and reporting requirements.
- (i) New owners of any part of the Group in case of mergers and acquisitions of shares or assets in such part of the Group, however, such disclosure shall be limited to the scope of disclosure legitimated by this Privacy Policy.

5.2 If we need to use or disclose your personal information for any other purpose, we will obtain your consent first, unless we are required or authorised by law (including the Data Protection Laws) to do so. This exception will often cover our dealings with law enforcement authorities.

6. Cross-border transfers of personal information

- 6.1 At times, we may disclose your personal information to third parties located outside of Australia and the European Economic Area. Countries in which these third parties are located will depend on the circumstances. However, in the course of our ordinary business operations we are likely to disclose personal information to third party service providers located in Singapore, Canada, India, New Zealand, The Philippines, UK and the US.
- 6.2 Appropriate safeguards will be put in place when processing cross-border personal transfers of personal information, including, but not limited to, standard contract clauses and data encryption.

7. Storage and protection of personal information

- 7.1 We generally host and store our data (including customer data and personal information) electronically in our IT systems located in both Australia and in Europe. These include our Australian-based cloud servers, the servers of third parties within Australia and overseas. We also hold personal information in hard copy paper files.
- 7.2 We implement appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure or use. These measures include:
 - (a) **Encryption:** We use encryption to protect personal data in transit and at rest.
 - (b) **Access controls:** We restrict access to personal data to authorised personnel only.
 - (c) **Data backups:** We regularly back up personal data to prevent data loss.

- 7.3 We also have online and network security systems in place for our Websites, so that the information you provide us with online is protected and secure. However, because of the nature of the internet, we cannot guarantee the security of your personal information. Please contact us if you become aware of any breach of security.
- 7.4 In accordance with our legal data protection and privacy obligations, we will only retain your personal information for as long as needed to achieve the purpose for which we obtained it in the first place. We will then either securely delete it or anonymise it so that it cannot be linked back to you.
- 7.5 Only where we are legally obliged to, or where this is necessary for defending our interests in the context of judicial proceedings (e.g. in case of a dispute), we may retain the personal information for longer periods.

8. Information collection technologies

- 8.1 Our Website uses cookies and other technologies such as internet tags and navigational data collection, which passively collect information (which means it is collected without you actively providing it). The technologies we use collect information such as your IP address, your device's unique identifier number, date, time and duration of your visit and the web address of the website that you visited before you arrived at our Website.
- 8.2 We use personal information collected through these technologies on our Website in order to optimise your online experience; cookies enable our Website to work more efficiently with the device you are using to access our Website. We also use this information in order to understand and measure your online experience and to make decisions about what products, services and promotions may be of interest to you. We do not use the personal information collected through these technologies for any other purpose.
- 8.3 You can manage cookies in the settings of your browser.
- 8.4 For detailed information on the cookies we use and the purposes for which we use them, please refer to our [Cookies Policy](#).

9. Individual (data subject) rights

- 9.1 You have the right to request access to and inspect your personal information held by the Group.
- 9.2 You have the right to request rectification and update of inaccurate or incomplete personal data.
- 9.3 You have the right to request to be forgotten and/or deletion of your personal information.
- 9.4 You have the right to request that you obtain the personal information you provide in a structured, machine-readable format.
- 9.5 You have the right to object and/or restrict the processing of your personal information in some circumstances (in particular, where we do not have to process the data to meet a contractual or other legal requirement or compelling interest).
- 9.6 You have the right to revoke consent. You shall at all times be entitled to revoke any consent that has already been given. The revocation of consent will not apply retrospectively. As such, any processing that has already occurred will remain lawful.
- 9.7 If you wish to exercise your rights, you submit your request using the contact details provided in section 13.

10. Data breach notification

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, we will investigate and notify you and the relevant data protection authority in accordance with the required timelines set by Law.

11. Complaints process

- 11.1 If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with the Australian Privacy Principles or GDPR, please contact us as set out in section 13.
- 11.2 When contacting us, please provide as much detail as possible in relation to the query, issue or complaint.

11.3 Your complaint will be taken seriously and will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner.

11.4 If you are not satisfied with our response or how we handled your complaint, you may complain to the Office of the Australian Information Commissioner (in writing) at:

Australia

Office of the Australian Information Commissioner
GPO Box 5288
SYDNEY NSW 2001

Tel: 1300 363 992

11.5 If you are based outside of Australia, you have the right to lodge a complaint with your relevant data protection authority:

Germany	The Netherlands	United Kingdom
The Federal Commissioner for Data Protection and Freedom of Information Graurheindorfer Straße 153 53117 Bonn	Dutch Data Protection Authority (Autoriteit Persoonsgegevens) Postbus 93374 2509 AJ Den Haag	Information Commissioner's Office Wycliffe House Water Lane Wilmslow SK9 5AF
Tel: +49 (0) 228 997799 0 poststelle@bfdi.bund.de	Tel: +31 (0)88 1805 250 info@autoriteitpersoonsgegevens.nl	Tel: 0303 123 1113

12. Policy update

We may update this Policy from time to time. Revised versions of the Group Privacy Policy will be published on our website. We will notify you by other means (for example, by placing a notice on our website) if material changes are made to this Policy. This privacy policy is effective as of July 2024.

13. Contact us

13.1 Please direct any privacy related requests, issues or queries to:

Australia

Privacy Officer
Collins Foods Limited
PO Box 286
Lutwyche QLD 4030

Tel: +61 7 3352 0800

privacyofficer@collinsfoods.com

13.2 If you are based outside of Australia, please refer to the below contact details:

Germany	The Netherlands
Data Protection Officer Collins Foods Germany Wanheimer Straße 45 40472 Düsseldorf	Data Protection Officer Collins Foods Netherlands Schurenbergweg 9b 1105 AP Amsterdam
datenschutz@collinsfoods.de	dataprivacy@collinsfoods.eu

Version history

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