PRIVACY POLICY

1 PURPOSE

This policy explains how SA Produce Market Limited (SAPML) protects privacy whilst conducting business that may involve the collection of personal and sensitive information.

2 SCOPE

This Privacy Policy applies to South Australian Produce Market Limited (SAPML) and any business, brand, program, event, website or service it controls that refers to this policy. This includes The Sunday Market at Merchant Square and other SAPML controlled operations.

3 ABOUT THIS POLICY

- South Australian Produce Market Limited (SAPML) owns and operates the South Australian Produce Market precinct at Pooraka, South Australia. This Privacy Policy explains how SAPML collects, holds, uses and discloses personal information across its corporate, wholesale market, property, commercial, workforce, digital, event and community-facing activities.
- Where a form, website, agreement or collection notice identifies a particular SAPML controlled entity or operation as collecting personal information, that entity or operation is responsible for the information it collects or handles. SAPML may provide shared administration, finance, technology, marketing, safety, security, property and other support services across its operations.
- Independent tenants, wholesalers, traders, stallholders, event organisers, contractors and service providers may collect personal information for their own purposes. Their own privacy policies or notices may apply to that information.
- SAPML handles personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles where they apply, and other applicable laws. This policy may be supported by a shorter privacy notice provided when information is collected for a particular form, event, service or system.
- SAPML does not sell personal information to third parties.

4 Who and what information SAPML collects

- Depending on the activity involved, SAPML may collect personal information about Market users, tenants and licensees, stallholders and vendors, event organisers and participants, visitors and customers, suppliers and contractors, shareholders, employees and applicants, and people who use SAPML websites or contact SAPML.
- The information collected may include:
  - contact and identification details, such as a name, address, email, telephone number, date of birth and signature;
  - business details, including a business or trading name, ABN, role, employer and business contact information;
  - Market registrations, access permissions, inductions, identification cards, vehicle details, parking and access records;
  - applications and records relating to leases, licences, stalls, sites, venues, bookings, suppliers, contractors and services;
  - payment, invoice, banking, payroll, taxation and transaction information;

- insurance, licences, permits, qualifications, food-business records and other compliance information;
- shareholder, recruitment, employment and workforce information;
- enquiries, correspondence, complaints, feedback, incident, first aid, safety and security information;
- photographs, recordings, CCTV footage, vehicle monitoring and access-control information; and
- website, device, browser, IP address, cookie, marketing and communication information.

- SAPML may collect sensitive information where it is reasonably necessary and permitted by law. This may include health information connected with an accident, injury, first aid response, workplace matter, public health matter or accessibility requirement. Consent will be obtained where required.

5 How personal information is collected

- SAPML usually collects personal information directly from the individual. Information may be collected through applications, registrations, bookings, agreements, transactions, websites, apps, emails, telephone calls, site visits, events, competitions, CCTV, vehicle monitoring and access-control systems.
- SAPML may also receive information from an authorised representative, employer, business, event organiser, service provider, government authority, public record or another third party where this is reasonably necessary or permitted by law.
- Where lawful and practical, people may interact with SAPML anonymously or by using a pseudonym. Identification may be required where it is needed to provide access, process an application or payment, enter into an agreement, investigate an incident, comply with the law or carry out the relevant activity.
- A person is generally not required to provide personal information unless this is required by law, contract or the nature of the service. However, SAPML may be unable to process an application, provide access or services, complete a transaction or respond properly if relevant information is not provided.

6 Why SAPML uses personal information

- SAPML may collect, use and disclose personal information where reasonably necessary to:
- operate, maintain and develop the South Australian Produce Market precinct and associated facilities;
- manage Market users, tenants, licensees, suppliers, contractors, shareholders and workforce matters;
- administer applications, approvals, registrations, bookings, leases, licences, agreements, payments and accounts;
- operate or support The Sunday Market at Merchant Square and other activities at Merchant Square;
- manage site access, parking, vehicles, traffic, deliveries, safety, security, first aid, incidents and insurance matters;
- provide and improve websites, digital systems, communications, events and services;
- undertake business development, marketing, community engagement, public relations and promotional activities;
- protect people, property, systems and SAPML's legal interests; and
- meet legal, regulatory, tax, audit, insurance and recordkeeping obligations.
- SAPML will not ordinarily use personal information for an unrelated purpose unless the individual has consented or the use is otherwise permitted or required by law.

7 How this policy applies across SAPML operations

- **Wholesale Market, property and commercial activities**
  - SAPML may use personal information to register and administer Market users, manage access and identification cards, conduct site inductions, manage vehicles and deliveries, administer leases and licences, communicate with tenants and occupiers, issue invoices and support the safe and efficient operation of the precinct. Information may also be collected when SAPML engages suppliers, contractors, consultants and professional advisers.
- **Corporate, shareholder and workforce matters**
  - SAPML may use personal information to maintain corporate and statutory records, communicate with shareholders, manage share transfers and governance processes, recruit and engage people, administer payroll and training, manage safety and performance, and meet employment and other legal obligations.
- **The Sunday Market at Merchant Square and other events**
  - Merchant Square is an event and community space within the precinct. It may host The Sunday Market at Merchant Square and other markets, events, functions and activations operated by SAPML, an SAPML controlled operation or an independent event organiser.
  - Members of the public attending the Sunday Market are not ordinarily required to register through the stallholder booking system or book online simply to enter and shop. Other events may involve ticketing, registration, competitions, vendor applications or mailing lists.
  - Where an independent event organiser collects personal information for its own purposes, that organiser is responsible for explaining its privacy practices. SAPML may receive information from, or provide relevant information to, an organiser where reasonably necessary for venue administration, event delivery, safety, security, incident management, compliance or another lawful purpose.

8 The Sunay Market at Merchant Square stallholder applications and LocalStalls.

- The Sunday Market at Merchant Square uses LocalStalls, a purpose-built digital system for stallholder applications, bookings, payments and market administration. LocalStalls is provided by Micah Group Pty Ltd ABN 26 144 808 453, trading as LocalStalls.
- Information collected through LocalStalls may include personal and business contact details, ABN and business information, products or services offered, stall and site requirements, vehicle and trailer information, licences, permits, insurance and compliance documents, equipment requirements, booking history, payment information and correspondence.
- Authorised Market Management personnel review applications and make decisions about eligibility or suitability to trade, allocation or restriction of access, and suspension or termination of stallholder access. LocalStalls does not automatically make these decisions.
- Providing certain information may be necessary before an application or booking can be assessed or approved. A short privacy notice may also be provided when information is collected through LocalStalls.

9 CCTV, vehicle monitoring and access systems

- CCTV operates across the South Australian Produce Market precinct, including Merchant Square, The Sunday Market at Merchant Square and areas used for other activities. SAPML controls or manages the relevant precinct CCTV and camera-based vehicle monitoring systems.

- These systems may collect images of people and vehicles, vehicle registration details, dates and times of entry, exit or movement, access records and other information captured during normal site monitoring. SAPML uses this information for safety, security, access and traffic management, incident investigation, prevention or investigation of loss or damage, and protection of people and property.
- CCTV recordings, including camera-based vehicle images, are stored on-site and are ordinarily retained for 30 days. They are then destroyed through the normal operation of the system.
- Where footage is separately downloaded or retained for an accident, incident, investigation, insurance matter, legal matter or regulatory requirement, that copy may be kept for as long as reasonably required. The 30-day period does not necessarily apply to access logs, incident reports or other records created from or linked to the footage.
- CCTV, vehicle monitoring or access information may be disclosed where reasonably necessary to police, emergency services, insurers, legal advisers, regulators, government authorities or other relevant parties, or where disclosure is required or authorised by law.

10 Photography, filming and promotional content

- Photography and filming may occur within the precinct, including at Merchant Square, The Sunday Market at Merchant Square and other events for marketing, advertising, websites, social media, newsletters, event promotion, media, corporate publications and records of activities or events.
- General photography or filming may include stalls, activities, events and crowds, and people may appear incidentally. Where reasonably practical, consent will be sought before an identifiable person is deliberately photographed or filmed as the main or featured subject. Particular care will be taken where children are intended to be featured.
- A person who does not wish to be deliberately photographed or filmed should advise SAPML staff, event staff or the photographer. A person concerned about an image published by SAPML or an SAPML controlled operation may contact SAPML using the details in this policy.

11 Websites, cookies and communications

- When a person uses an SAPML or SAPML controlled website, app or digital service, SAPML may collect technical information such as an IP address, browser and device information, pages viewed, date and time of access, referring websites and interaction with website content.
- SAPML may use cookies, analytics tools and similar technologies to operate websites, understand how they are used, improve content and services, measure performance and support security. Browser settings may allow users to limit cookies, although this may affect some website functions.
- Where permitted by law, SAPML may use contact information to provide relevant information about the precinct, markets, events, programs or services. Recipients may opt out of marketing communications through the unsubscribe option provided or by contacting SAPML. This does not prevent SAPML from sending necessary operational, safety, account or service communications.

12 Sharing information, service providers and overseas processing

- SAPML may disclose personal information where reasonably necessary to SAPML controlled operations, tenants, Market users, stallholders, vendors, event organisers, technology and hosting providers, booking and payment providers, security and operational contractors, professional advisers, insurers, banks, share registry and workforce service providers, emergency services, regulators and government authorities. Information may also be disclosed with consent or where required or authorised by law.

- The LocalStalls production database and backups are hosted using Amazon Web Services in Sydney, Australia. In providing and supporting the service, authorised LocalStalls personnel, contractors or subprocessors located outside Australia may access or process personal information. The overseas processing locations identified to SAPML for LocalStalls are the United Kingdom, India and the Philippines.
- SAPML may use other service providers that operate or support systems from outside Australia. Where required and practical, SAPML will identify likely overseas locations in this policy, a privacy collection notice or other information provided when the information is collected. SAPML takes reasonable steps required by applicable privacy law in relation to overseas recipients and service providers.
- Payments and other financial transactions may be processed through SAPML systems or third-party providers. Information handled directly by those providers may also be subject to their own privacy and security arrangements. SAPML websites may contain links to independent websites, and SAPML is not responsible for the privacy practices of those organisations.

13 Information quality, security, retention and data breaches

- SAPML takes reasonable steps to keep personal information accurate, up to date, complete and relevant for the purpose for which it is used or disclosed.
- SAPML also takes reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Information may be stored in electronic systems, cloud services, databases, email systems or physical records, with access limited where appropriate to people who require it for legitimate purposes.
- Except for routine CCTV recordings covered in section 7, personal information may be retained for as long as reasonably necessary for the purpose for which it was collected, operational and commercial requirements, contractual obligations, safety and incident management, insurance, accounting, taxation, employment, corporate administration, legal or regulatory requirements, or legal claims.
- When personal information is no longer required and SAPML is not required or permitted to retain it, SAPML will take reasonable steps to destroy it securely or de-identify it.
- SAPML has processes for responding to suspected or actual data breaches. SAPML will assess the matter, take reasonable steps to contain and respond to it, and make any notifications required by law.

14 Access, correction and privacy complaints

- A person may request access to personal information SAPML holds about them and may ask SAPML to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading.
- SAPML may need to verify the person's identity before providing access or making a correction. SAPML will respond within a reasonable period, generally within 30 calendar days, depending on the nature and complexity of the request.
- There is no charge for making a request. Where permitted by law, SAPML may charge a reasonable amount for the cost of providing access and will advise the person before any charge is incurred. SAPML will not charge for correcting personal information.
- There may be circumstances in which access or correction can lawfully be refused or limited. Where required, SAPML will provide written reasons and information about available complaint options.

- A person who has a privacy question or complaint should contact SAPML and provide enough information for the matter to be understood and investigated. SAPML will respond within a reasonable period, generally within 30 calendar days. If the person is not satisfied with SAPML's response, they may be entitled to complain to the Office of the Australian Information Commissioner at www.oaic.gov.au.

15 Changes to this policy and contact details

- SAPML may update this Privacy Policy to reflect changes in its operations, systems, services, events, information-handling practices or legal obligations. The current version will be available on the SAPML website and may also be referred to by SAPML controlled operations.

16 Privacy enquiries, access and correction requests, and privacy complaints

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17 APPROVAL



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Andrew Myers

CEO