

Policy 15: First Fresh Privacy Policy  
Department / division: Southern Paprika Limited  
Reviewed date: 11 June 2025

# Southern Paprika Limited Privacy Policy (External Website)

## INTRODUCTION

**Southern Paprika Limited (SPL) complies with all relevant laws, including the Privacy Act 2020 (the Act), when dealing with personal information. Personal information is information about an identifiable individual.**

SPL is committed to the protection of personal privacy and supports a work environment that abides by the Act and in particular the Information Privacy Principles contained in the Act.

This Privacy Policy describes how we treat personal information that we receive. The objective of this policy is to provide a fair, consistent and transparent guideline for handling personal information in compliance with the Act. As someone who deals with us and provides us with personal information, you agree to be bound by this policy.

This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

Personal information of current SPL employees, directors, and contractors is covered by SPL's internal privacy policy rather than this policy. Please see the SPL Online Document Management System or contact SPL's privacy officer (see section 9) for a copy of the internal privacy policy if relevant to you.

## 1. Changes to this policy

We may change this policy at any time by posting an updated version of the policy on our website at [spl.nz](http://spl.nz). Changes will apply from the date the revised policy is posted on our website.

## 2. Collecting your information

### Types of information we collect

SPL may collect and hold information from different people including (but not limited to):

- customers/buyers
- suppliers and growers (and their employees and contractors)
- business partners
- shareholders
- prospective employees, directors or contractors,
- other people who deal with SPL from time to time.

### *Customers/buyers*

If you are a current or prospective customer of SPL or buyer through SPL, we may collect:

- identifying information about you, such as your name, address, and contact details
- payment details and other financial information
- information you provide in relation to any application process, including a credit application
- information about your transactions with SPL
- information relating to your purchase/use of our products and services
- biometric information about you through our sign in system at SPL
- information about you through AI models or tools (or similar) which may be used or implemented in SPL's business.

### *Growers/suppliers*

If you are a current or prospective grower and/or supplier of SPL, we may collect:

- personal information about you, including your name, address, job title and contact details
- payment details and other financial information
- information you provide in relation to any application process to become a grower/supplier
- information about your property, including information relating to produce grown on your property
- other information about your business relationship with SPL, including information about your transactions with SPL
- biometric information about you through our sign in system at SPL's premises
- information about you through AI models or tools (or similar) which may be used or implemented in SPL's business.

## **Other**

We may collect other personal information from time to time. As a general principle, we will only collect information where needed for the particular purpose the information was provided for or where required by law.

Providing your personal information is generally optional for you. However, if you do not provide information to us when requested, we may not be able to provide products and services to you.

In some cases, the information that we collect is business-related including, but not limited to:

- The name of the business/place of work
- Contact details for the business/place of work
- Information about the business relationship with SPL

Although this type of information is not strictly covered by the Act, we aim to manage this information responsibly and respecting any confidentiality and protect any personal information collected by SPL in accordance with the Act.

## **How we collect your information**

We will generally collect personal information from you directly including:

- when you use our website and any related service
- through any registration, application, or subscription process (or similar)
- when you commence a business or service relationship with us
- through any contact or interactions with us (e.g. telephone call, email, face-to-face meetings, or interviews)
- when you buy or use our services and products
- through surveillance devices that may be situated on our premises
- through our sign in system at SPL's premises
- through AI models or tools (or similar) which may be used or implemented in SPL's business
- while conducting customer satisfaction and market research surveys
- through promotions

We may also collect your personal information from third parties where you have authorised this, this is permitted by law, or the information is publicly available.

## **3. What do we use personal information for?**

SPL collects personal information for a number of purposes/uses connected with our business, including:

- to conduct our business
- to verify your identity and any registration, application, or subscription details (or similar)

- to meet our legal obligations, including our reporting obligations
- to provide news and updates to you in the future
- for marketing, publicity, or market research that we might undertake
- to manage and improve our products and services
- to interact and communicate with you
- to identify you and register you as visiting SPL's premises, through our sign in system at SPL's premises
- to operate or train AI models or tools (or similar) which may be used or implemented in SPL's business.
- for other purposes for which you have given permission, or which is required or allowed by law.

### *Customers/buyers*

If you are a customer of SPL or buyer through SPL, we may also use your personal information:

- to administer your account (including credit checks, processing, administering, and collecting payments from you)
- to provide and market our products and services, including contacting you electronically (e.g. by text or email for this purpose)

### *Growers/suppliers*

If you are a current or prospective grower and/or supplier of SPL, we may also use your personal information:

- to purchase products or services from you
- to administer your account (including administering and making payments to you)

We may use surveillance footage, if required, for detecting and deterring inappropriate or criminal behaviour at our premises, and monitoring the safety and security of our customers, suppliers, staff, and property. We will collect, use and disclose this footage in accordance with our CCTV policy.

We may also use your information in an anonymised aggregated form, to carry out analysis of our products, services, and customer interactions.

Prior to using any personal information, SPL will take reasonable steps to ensure that, having regard to the purpose for which the information is proposed to be used, it is accurate, up to date, complete, relevant and not misleading.

## 4. Disclosing your personal information

We may disclose your personal information to:

- our employees, directors, contractors, suppliers, customers, and agents
- affiliated and related companies (including SPL group companies and associate and joint venture companies)
- any business that supports our services and products, including any person that hosts or maintains our IT system or data centre, or that we use to provide our website or other services and products
- other third parties to analyse traffic at our web site, which may involve the use of cookies
- other companies or individuals who assist in providing services or who perform functions on behalf of SPL, such as mailing houses and specialist consultants
- our advisors
- credit risk assessment agencies and debt collection agencies
- any court tribunal or regulatory authority where disclosure is required or allowed by law
- any other person authorised by you or by law.

## 5. Storing and protecting your personal information

SPL staff and SPL directors are required to respect the confidentiality of personal information and the privacy of individuals.

We take reasonable steps to ensure your personal information is stored securely and to keep your personal information safe from loss, unauthorised access, modification, disclosure, or other misuse.

If a privacy breach occurs which has caused or may cause serious harm to you, we will notify you of this as soon as practicable (subject to any exceptions in the Act) either directly or, if that is not reasonably practicable, by public notice.

We may store your personal information using a third-party service provider (including providers outside New Zealand). Our agreements with them prohibit the information that we collect from you being used by them in a way that we have not authorised.

We keep personal information only for as long as it is needed and will take reasonable steps to securely destroy or delete personal information where it is no longer required. We may be required by law to retain certain personal information.

## 6. Transfer of personal information outside New Zealand

We may from time to time transfer personal information to third parties outlined above who are located outside New Zealand. If we do so, we will ensure your personal information will be protected by comparable safeguards to those in New Zealand law. If your personal information will not be protected by comparable safeguards to those in New Zealand law, we will tell you that this is the case, and only transfer your personal information with your consent.

## 7. Accessing and correcting your personal information

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to access or correct your personal information, email the SPL Privacy Officer, Sheryl Lewis at [sheryl@spl.nz](mailto:sheryl@spl.nz). Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

In some cases, there may be a charge associated with providing copies of your personal information to you. If so, we will let you know before sending your information to you.

SPL's Privacy Officer has the role of ensuring that SPL complies with the principles of information privacy, addressing any enquiries about privacy and personal information made under the Act and working with the Privacy Commissioner as required on any complaints about privacy.

## 8. Internet use

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information to them or any other third party.

We use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognise your browser) to monitor your use of the website. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of the website.

## 9. Contact details

If you have any questions about our privacy policy, or any other related matter, please feel free to contact us. You can reach us by contacting our privacy officer at SPL, Sheryl Lewis, at [sheryl@spl.nz](mailto:sheryl@spl.nz).