

PRIVACY POLICY

1. INTRODUCTION

- 1.1 In the course of our business in Australia, we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.
- 1.2 We are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the way that personal information must be treated.
- 1.3 This privacy policy also incorporates our policy on managing credit information (see particularly section 8 onwards).

Who does the privacy policy apply to?

- 1.4 This policy applies to any person in relation to whom we currently hold, or may in the future collect, personal information. Broadly, we only collect personal information from customers, subcontractors and agents who perform services on our behalf, and from prospective employees and prospective subcontractors. This policy does not apply to acts and practices that directly relate to employee records of our current and former employees.

What information does the privacy policy apply to?

- 1.5 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.6 Information is not personal information where the information cannot be linked to an identifiable individual.

2. HOW DO WE MANAGE THE PERSONAL INFORMATION WE COLLECT?

- 2.1 We manage the personal information we collect in numerous ways, such as by:
 - (a) implementing procedures for identifying and managing privacy risks;
 - (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
 - (c) providing staff with training on privacy issues;
 - (d) appropriately supervising staff who regularly handle personal information;
 - (e) implementing mechanisms to ensure any agents or contractors who deal with us comply with the APPs;
 - (f) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints; and
 - (g) appointing a privacy officer within the business to monitor privacy compliance.
- 2.2 We will take reasonable steps to destroy or de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.

- 2.3 Because the nature of our business primarily involves packaging, transporting, storage, distribution and general freight services, it is generally not possible to use a pseudonym or remain anonymous when dealing with us. However, we may be able to offer you a temporary account and limited services if you wish to use a pseudonym or remain anonymous. If you want to use a pseudonym or remain anonymous when dealing with us, you should notify us and we will try to accommodate your request, subject to our ability to perform the services.

3. WHAT KINDS OF INFORMATION DO WE COLLECT AND HOLD?

- 3.1 The personal information we may collect differs, depending on whether you are a customer, a subcontractor or agent, or a prospective employee or a prospective subcontractor.

Personal information (customers)

- 3.2 If you are a customer, we may collect and hold personal information about you, which may include:
- (a) your contact details;
 - (b) financial and credit information;
 - (c) date and place of birth;
 - (d) information in publicly available company records about you; and
 - (e) any other personal information required to provide the services to you.

Personal information (subcontractors and agents and prospective employees)

- 3.3 If you are a subcontractor or agent, or a prospective employee or a prospective subcontractor, we may collect and hold personal information about you, which may include:
- (a) sensitive information (see below);
 - (b) contact information;
 - (c) date of birth;
 - (d) employment arrangements and work history;
 - (e) insurance information and claims history;
 - (f) credit information;
 - (g) licence details;
 - (h) education details;
 - (i) driving history;
 - (j) video recordings, photographs and GPS location data from in vehicle monitoring systems;
 - (k) banking details; and
 - (l) any other personal information required to engage you as our subcontractor or agent, or to consider offering you employment.
- 3.4 We use Red Square IT Pty Ltd trading as Induct for Work to provide a portal for collection employment data and for providing induction services. You may be provided with a log on to allow

you to upload information (some of which may be personal information). Induct for Work has its own privacy policy that is available on its website at www.inductforwork.com.au.

Sensitive information

- 3.5 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.6 Generally, we do not collect sensitive information about customers.
- 3.7 However, we may collect sensitive information from and about subcontractors and agents, and prospective employees and subcontractors, such as:
- (a) health information (including but not limited to drug and alcohol testing results);
 - (b) criminal history;
 - (c) membership of professional or trade associations; and
 - (d) membership of trade unions.
- 3.8 We will not collect sensitive information without the individual's consent to which the information relates unless permitted under the Privacy Act.

4. HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?

- 4.1 Our usual approach to collecting personal information is to collect it directly from the individual concerned.
- 4.2 We may also collect personal information in other ways, such as from:
- (a) our subcontractors and agents;
 - (b) your current and previous employers;
 - (c) entities that conduct drug and alcohol tests on our behalf;
 - (d) doctors or other medical professionals who carry out health screening checks;
 - (e) trade references;
 - (f) in-vehicle cameras and other in vehicle monitoring systems; and
 - (g) insurance providers (including our trade credit insurer) and brokers.

5. HOW DO WE HOLD PERSONAL INFORMATION?

- 5.1 Our usual approach to holding personal information includes holding that personal information:
- (a) physically, at our premises;
 - (b) electronically, on secure servers; and
 - (c) in a private cloud.
- 5.2 We secure the personal information we hold in numerous ways, including:
- (a) using security systems to limit access to premises outside of business hours;

- (b) using secure servers to store personal information;
- (c) using unique usernames, passwords and other protections on systems that can access personal information; and
- (d) holding certain sensitive documents securely.

6. WHY DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

6.1 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which information is collected varies, depending on the particular service being provided or the individual from whom we are collecting the information but is generally as follows:

- (a) in the case of customers – to provide you with packaging, storage, distribution or general freight and transport services;
- (b) in the case of subcontractors and agents – to assist us in providing our customers with high quality packaging, storage, distribution or general freight and transport services;
- (c) in the case of potential employees and subcontractors – to assess your suitability for employment or engagement.

6.2 Personal information may also be used or disclosed by us for secondary purposes that are within an individual's reasonable expectations and that are related to the primary purpose of collection.

6.3 We may collect and use customers' personal information:

- (a) to assess eligibility for credit;
- (b) to keep records of transactions to assist in future enquiries and enhance our customer relationship with you; and
- (c) to send you special offers in relation to our services.

6.4 We may collect and use subcontractors' and agents' personal information:

- (a) to conduct checks to ensure that the subcontractor or agent can perform and is performing the services to our standards; and
- (b) for payment purposes.

6.5 We may disclose personal information to:

- (a) subcontractors and agents;
- (b) employers of individuals;
- (c) practitioners and entities that provide drug and alcohol testing and other medical testing for us;
- (d) government bodies (such as Centrelink and road transport authorities);
- (e) other service providers in order to provide the freight or transport service, or to assist our functions or activities (such as our advisers and consultants);
- (f) insurance providers and brokers, including our trade credit insurer;
- (g) credit reporting bodies such as Creditor Watch and ARMA Group;

- (h) customers of Cirtrans who require the information as part of their compliance procedures or systems or to meet legislative requirements; and
- (i) any third party technology providers we engage from time to time, such as email filter providers.

6.6 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

7. WILL WE DISCLOSE PERSONAL INFORMATION OUTSIDE AUSTRALIA?

We generally do not disclose personal information outside of Australia apart from our cloud provider that has data centres in the United States. We take reasonable steps to ensure this personal information is handled in a safe and secure manner.

8. HOW DO WE MANAGE YOUR CREDIT INFORMATION?

What kinds of credit information may we collect?

- 8.1 We generally do not collect credit information about subcontractors and employees.
- 8.2 In the course of providing our services to a customer, we may collect and hold the following kinds of credit information:
 - (a) your identification information;
 - (b) information about any credit that has been provided to you;
 - (c) your repayment history;
 - (d) information about your overdue payments;
 - (e) whether terms and conditions of your credit arrangements with us are varied;
 - (f) whether any court proceedings are initiated against you in relation to your credit activities;
 - (g) information about any bankruptcy or debt agreements involving you;
 - (h) any publicly available information about your credit worthiness; and
 - (i) any information about you where you may have fraudulently or otherwise committed a serious credit infringement.
- 8.3 We may also collect personal information that may affect a customer's credit worthiness from other credit providers (e.g. trade referees and banks) that themselves may collect that information from credit reporting bodies. The kinds of personal information we collect may include any of those kinds of personal information outlined in section 3.2 of this policy.

How and when do we collect credit information?

- 8.4 In most cases, we will only collect credit information about you directly from a customer or their trade referees.
- 8.5 Other sources we may collect credit information from include:
 - (a) credit reporting bodies such as Creditor Watch and ARMA Group;
 - (b) commercial debt collecting businesses such as EzyCollect;
 - (c) ASIC;

- (d) banks and other credit providers;
- (e) your suppliers and creditors; and
- (f) our subcontractors and agents.

How do we store and hold the credit information?

8.6 We store and hold credit information in the manner outlined in section 5 of this policy.

Why do we collect the credit information?

8.7 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with transport services.

8.8 We may also collect the credit information to:

- (a) process payments; and
- (b) assess eligibility for credit.

Overseas disclosure of the credit information

8.9 Other than any information stored in our private cloud (that has data centres in the United States of America), we will not disclose your credit information to entities without an Australian link unless you expressly request us to.

How can I access my credit information, correct errors or make a complaint?

8.10 You can access and correct your credit information, or complain about a breach of your privacy in the manner set out in section 9 of this policy.

9. HOW DO YOU MAKE COMPLAINTS OR ACCESS AND CORRECT YOUR PERSONAL OR CREDIT INFORMATION?

9.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

Access to information and correcting personal information

9.2 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.

9.3 We will grant you access to your personal information as soon as possible, subject to the request circumstances.

9.4 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.

9.5 We may deny access to personal information if:

- (a) the request is unreasonable;
- (b) providing access would have an unreasonable impact on the privacy of another person;
- (c) providing access would pose a serious and imminent threat to the life or health of any person; or
- (d) there are other legal grounds to deny the request.

- 9.6 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed before it is levied.
- 9.7 If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

Complaints

- 9.8 If you want to complain about an interference with your privacy, you must follow the following process:
- (a) The complaint must first be made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
 - (b) If the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

Who to contact

- 9.9 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

Privacy Officer: Anthony Espulso

Postal Address: PO Box 126, KINGSWOOD NSW 2747

Telephone number: 1300 787 654

Email address: privacy@cirtrans.com

10. CHANGES TO THE POLICY

- 10.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.
- 10.2 This policy is effective from 1 August 2020. If you have any comments on the policy, please contact our privacy officer using the contact details in section 9 of this policy.

Revision history			
Version	Approved by	Approval date	Effective date
1	Anthony Espulso	28 November 2014	1 December 2014
2	Anthony Espulso	30 July 2020	1 August 2020