

# PRIVACY POLICY

## Preface

Hi-Trans Express Pty Ltd (ABN 38 003 219 216/ACN 003 219 216) is a transport and logistics provider in Australia. 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).

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.

### **Who does the privacy policy apply to?**

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, providers of transport services and agents who perform services on our behalf and from prospective employees and prospective providers of transport services.

### **What information does the privacy policy apply to?**

This policy applies to personal information. Personal information within this policy means any information, whether true or not, relating to an individual whose identity is apparent or can reasonably be ascertained from the information.

## Policy

### 1. Definition of Terms

Personal information within this policy means any information, whether true or not, relating to an individual whose identity is apparent or can reasonably be ascertained from the information.

Sensitive information is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.



Generally, we do not collect sensitive information about customers. However, we may collect sensitive information from and about providers of transport services and agents, and prospective employees and prospective providers of transport services, such as:

- A. health information (including but not limited to drug and alcohol testing results);
- B. criminal record;
- C. membership of professional or trade associations; and
- D. membership of trade unions.

We will not collect sensitive information without the individual's consent to which the information relates unless permitted under the Privacy Act.

## 2. What kind of information we collect, hold, use, disclose and store

The personal information we may collect differs, depending on whether you are a customer, a provider of transport services, or a prospective employee or a prospective provider of transport services.

### **Customers and prospective customers**

The personal information we collect generally includes, but not limited to, your contact details, financial and credit information, date of birth, residential addresses, information in publicly available company records about you and any other personal information required to provide the services to you.

### **Contractors, suppliers, distributors, agents, service providers and prospective employees, contractors, suppliers, distributors, agents, service providers and the people who represent the businesses we deal with.**

The personal information we collect generally includes, but not limited to, sensitive information, (refer to definition of terms), your contact details, photographs, date of birth, employment arrangements and history, insurance information and claims history, licence details, education details, driving history, banking details and any other personal information required to engage you as a provider of goods and services or to consider offering you employment.

## 3. How we collect personal information

Wherever possible and practical to do so, we will collect personal information directly from you, this may be in person, over the telephone, by mail, over the internet, by e-mail or fax, or by completion of a form (such as an application form).



We may also collect personal information in other ways, such as from:

- A. other providers of goods and services;
- B. current and previous employers;
- C. entities that conduct medical testing and drug and alcohol tests on our behalf;
- D. trade references;
- E. insurance providers and brokers; and
- F. other entities in the Hi-Trans Group of Companies.

When we collect personal information about you, we will take reasonable steps to notify you or ensure that you are otherwise aware of:

- A. the fact that we have collected your personal information, and whether that collection is required or authorised by law;
- B. the purposes of collection;
- C. the consequences if personal information is not collected (such as if this will affect our ability to provide products or services to you);
- D. the usual situations in which we disclose personal information of the kind collected;
- E. information about this Privacy Policy; and
- F. that we are likely to disclose personal information to overseas recipients, and if practicable, the relevant countries in which they are located.

Some of the above information is included in this Privacy Policy.

In the course of operating our business it may be necessary to collect personal information from third parties. This will be limited to circumstances where it is impracticable or unreasonable for us to collect if from you. The type of third party who might provide information to us will vary depending on the nature of the business and interaction with you.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information. We will not, however, make any such request to any third party in circumstances where it would not be practical to do so.

#### 4. Why we collect, hold, use or disclose personal information

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.



We collect and hold personal information to:

**For customers and prospective customers**

To provide you with transport and warehousing services;

We may also collect and use customers' personal information:

- A. to assess eligibility for credit; and
- B. to keep records of transactions to assist in future enquiries and enhance our customer relationship with you.

**Contractors, suppliers, distributors, agents, service providers and prospective employees, contractors, suppliers, distributors, agents, service providers and the people who represent the businesses we deal with**

- A. To assist us in providing our customers with high quality transport and warehousing services;
- B. to conduct checks to ensure that you can perform and is performing the services to our standards;
- C. to assess suitability for employment or engagement; and
- D. for payment purposes.

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.

We may use and disclose personal information to:

- A. providers of transport services;
- B. employers of individuals;
- C. credit reporting bodies such as National Credit Insurance (Brokers) Pty Ltd;
- D. practitioners and entities that provide drug and alcohol testing and other medical testing for us;
- E. government bodies (such as Centrelink, police departments, road transport authorities, immigration authorities and the Australian Taxation Office);
- F. other service providers in order to provide the freight or transport service, or to assist our functions or activities (such as our accountants, advisers, consultants and compliance auditors);
- G. insurance providers and brokers;
- H. customers of Hi-Trans Express who require the information as part of their compliance procedures or systems or to meet legislative requirements;
- I. other entities within the Hi-Trans Group of Companies; and
- J. any third-party technology providers we engage from time to time, such as email filter providers.

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



## 5. How we manage the personal information we collect

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.

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.

Because the nature of our business primarily involves transporting, 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.

## 6. How we hold personal information

Our usual approach to holding personal information includes holding that personal information physically, at our premises and electronically.

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.



## 7. Direct marketing

We may contact you using the contact details which you provide to us in order to provide you with direct marketing communications about our services and business. We will comply with our obligations under the *Spam Act 2003 (Cth)* and the *Do Not Call Register Act 2006 (Cth)* in relation to such direct marketing communications. You may opt out of receiving direct marketing communications from us at any time by contacting us using the details set out below.

## 8. Outsourcing and third parties

We work with third parties to provide some types of sales, business and customer support. They may have access to systems that include your personal information. These companies are subject to strict controls that protect your information from unauthorised use or disclosure and limit their access to your personal information to the extent necessary to do their job.

## 9. Access to personal information from overseas

Some of the parties mentioned in section 8 are located overseas. These parties have secured and limited access to personal information. These overseas companies are involved in providing services like data storage, transport bookings, data entry and processing. The overseas companies we are working with are located in, but not limited to, the Philippines, Singapore and United States of America.

Hi-Trans Express maintains effective control of your information at all times, including ensuring that parties located overseas are subject to strict controls that limit access and subsequent handling of your information to the extent strictly necessary to perform the relevant function and protect your information from unauthorised use and disclosure.

## 10. How we manage your credit information

We generally do not collect credit information about providers of transport services and employees.

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.

In some circumstances, we may collect credit information and personal information from credit reporting bodies (e.g. National Credit Insurance (Brokers) Pty Ltd). The kinds of personal information we collect may include any of those kinds of personal information contained within this policy.

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 contained within this policy.

#### **How and when we collect credit information**

Generally, we will only collect credit information directly from a customer, their trade referees and credit reporting bodies.

Other sources we may collect credit information from include:

- A. ASIC;
- B. banks and other credit providers;
- C. your suppliers and creditors; and
- D. our providers of transport services and agents.

#### **How we store and hold the credit information**

We store and hold credit information in the manner outlined in this policy.

#### **Why we collect the credit information**

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

We may also collect the credit information to:

- A. process payments; and
- B. assess eligibility for credit.



## 11. How you can access your credit information, correct errors or make a complaint

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

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

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

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.

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.

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

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

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:

**Website:** [www.hi-trans.com.au](http://www.hi-trans.com.au)  
**Postal Address:** C/- Privacy Officer, PO Box 2187, Regency Park SA 5942  
**Telephone number:** 08 8447 7777  
**Email address:** [privacy@hi-trans.com.au](mailto:privacy@hi-trans.com.au)





## 12. Changes to the policy

We may update, modify or remove this policy at any time without prior notice.

If you have any comments on the policy, please contact our privacy officer using the contact details in Section 11 of this policy.

