

Privacy Policy

Introduction

In the course of our business in Australia, there are circumstances where we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.

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 in which personal information must be treated. This privacy policy also incorporates our policy on managing credit information (see particularly section 8 onwards).

1. Who does the privacy policy apply to?

This policy applies to any person for whom we currently hold, or may in the future collect, personal information. Broadly, we only collect personal information from customers, from subcontractors and agents who perform services on our behalf, and from prospective employees.

2. What information does the privacy policy apply to?

2.1 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.

2.2 Information is not personal information where the information cannot be linked to an identifiable individual.

3. How do we manage the personal information we collect?

3.1 We manage the personal information we collect in numerous ways, such as by:

- implementing procedures for identifying and managing privacy risks;
- implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
- providing staff with training on privacy issues;
- appropriately supervising staff who regularly handle personal information;
- implementing mechanisms to ensure any agents or contractors who deal with us comply with the APPs;
- implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints;
- appointing a privacy officer within the business to monitor privacy compliance.

3.2 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.

3.3 Because the nature of our business primarily involves packaging, 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 do wish to

use a pseudonym or remain anonymous when dealing with us, you should notify us and we will use our best endeavours to accommodate your request subject to our ability to perform the services.

4. What kinds of information do we collect and hold?

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

5. Personal information (customers)

5.1 If you are a customer, we might collect and hold personal information about you, which may include:

- your contact details;
- financial and credit information;
- date and place of birth;
- information in publicly available company records about you; and
- any other personal information required to provide the services to you.

Personal information (subcontractors and agents and prospective employees)

5.2 If you are a subcontractor or agent, or a prospective employee, we might collect and hold personal information about you, which may include:

- sensitive information (see below);
- contact information;
- date and place of birth;
- Resume / CV and: covering letter;
- visa and passport details;
- employment arrangements and work history;
- insurance information and claims history;
- credit information;
- licence details;
- education details;
- driving history;
- banking details; and
- any other personal information required to engage you as our subcontractor or agent, or to consider offering you employment.

6. Sensitive information

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

6.2 Generally, we do not collect sensitive information about customers.

6.3 However, we may collect sensitive information from subcontractors and agents, and prospective employees, such as:

- health information (including drug and alcohol testing results);
- medical history;
- criminal history; and
- membership of professional or trade associations.

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

7. How and when do we collect personal information?

Our usual approach to collecting personal information is to collect it directly from the individual concerned.

7.1 Collection via CCTV cameras

We may record and monitor any person visiting our sites using closed circuit television (CCTV) cameras. The purpose of this monitoring and recording is:

- to prevent and detect crime;
- to provide a safe and secure work environment;
- to protect our property and the property of our customers, subcontractors, agents and visitors; and
- for quality assurance and compliance purposes.

7.2 Collection via our website including use of cookies

Our website at www.seqh.com.au uses 'cookies'. Cookies are identifiers that allow us to recognise your browser or device and tell us how and when pages on our website are visited and by how many people.

7.3 Our website also hosts third party cookies through 'Youtube' links. These cookies tell us when videos on our website are watched and by how many people.

7.4 You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer.

7.5 Our website also requests personal information from customers making an enquiry through the 'Contact Us' page. We only collect information that is necessary to identify, complete and respond to the enquiry.

8. Collection via third parties

We may also collect personal information in other ways, which might include from:

- our subcontractors and agents;
- your current and previous employers;
- entities that conduct licence checks on our behalf;
- entities that conduct drug and alcohol testing or other medical testing on our behalf;
- doctors or other medical professionals who carry out health screening checks;

- use of an intelligent access program and on-board cameras installed in vehicles operated by us; trade references;
- insurance providers and brokers; and
- other entities within the SEQH group.

9. How do we hold personal information?

9.1 Our usual approach to holding personal information includes:

- physically, at our premises;
- electronically, on secure servers; and
- in private clouds.

9.2 We secure the personal information we hold in numerous ways, including:

- using security systems to limit access to premises outside of business hours;
- using secure servers to store personal information;
- using unique usernames, passwords and other protections on systems that can access personal information; and
- holding certain sensitive documents securely.

10. Why do we collect, hold, use or disclose personal information?

10.1 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:

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

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

10.3 We may collect and use customers' personal information:

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

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

- to conduct checks to ensure that the subcontractor and agent can perform the services to our standards;
- as part of our commitment to the safety of our transport operations and as required by regulatory schemes; and

- for payment purposes.

10.5 We may disclose personal information to:

- subcontractors and agents;
- employers of individuals;
- entities that conduct licence checks for us;
- entities that provide drug and alcohol testing or other medical testing for us;
- government bodies (such as WorkCover, Centrelink, the Australian Taxation Office, Police departments, workplace health and safety authorities, road authorities and transport authorities);
- 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);
- the administrator of a warranty scheme;
- insurance providers and brokers;
- credit reporting bodies;
- entities that provide data entry for us;
- our customers who require the information as part of their compliance procedures or systems or to meet legislative requirements;
- other entities within the SEQH; and
- any third party technology providers we engage from time to time.

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

11. When will we disclose personal information outside Australia?

We generally do not disclose personal information outside of Australia except to:

- a data entry provider in the Philippines; and
- our service provide RBC Technologies whom are based in Australia but may have backup data centres in locations outside of Australia

We take reasonable steps to ensure this personal information is handled in a safe and secure manner. Our data entry provider in the Philippines is connected to our secure servers in Australia via a virtual private network.

12. How do we manage your credit information?

12.1 What kinds of credit information may we collect?

We generally do not collect credit information about subcontractors and employees. In the course of providing our services to a customer, we may collect and hold the following kinds of credit information:

- your identification information;
- information about any credit that has been provided to you;
- your repayment history;
- information about your overdue payments;
- whether terms and conditions of your credit arrangements with us are varied;

- whether any court proceedings are initiated against you in relation to your credit activities;
- information about any bankruptcy or debt agreements involving you;
- any publicly available information about your credit worthiness; and
- any information about you where you may have fraudulently or otherwise committed a serious credit infringement.

We may also collect personal information which may affect a customer's credit worthiness from other credit providers (e.g. trade referees) 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 this policy.

12.2 How and when do we collect credit information?

In most cases, we will only collect credit information about you directly from a customer or their trade referees. Other sources we may collect credit information from include:

- credit reporting bodies;
- your suppliers and creditors; and
- our subcontractors and agents.

12.3 How do we store and hold the credit information?

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

12.4 Why do 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 credit.

12.5 We may also collect the credit information to:

- process payments; and
- assess eligibility for credit.

12.6 Overseas disclosure of the credit information

- Except to a data entry provider in the Philippines, we will not disclose your credit information to entities without an Australian link unless you expressly request us to.

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

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

14. How do you make complaints and access and correct your personal information or credit information?

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

15. Access to information and correcting personal information

- 15.1 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.
- 15.2 We will grant you access to your personal information as soon as possible, subject to the request circumstances.
- 15.3 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.
- 15.4 We may deny access to personal information if:
- the request is unreasonable;
 - providing access would have an unreasonable impact on the privacy of another person;
 - providing access would pose a serious and imminent threat to the life or health of any person;
 - There are other legal grounds to deny the request.
- 15.5 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.
- 15.6 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.

16. Complaints

If you wish to complain about an interference with your privacy, then you must follow the following process:

- The complaint must be firstly made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
- In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

17. 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:

Privacy Officer: Mark Lucas (HR Manager)
Postal Address: 68 Gosport Street, Hemmant QLD 4078
Telephone number: (07) 3823 7404
Email address: hr@seqh.com.au

18. Changes to the policy

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. This policy is effective from December 2019. If you have any comments on the policy, please contact the nominated privacy officer using the contact details in this policy.



Full Name: Brett Plummer
Title: Managing Director
Date: 01 Dec 2019