

PRIVACY POLICY

1. INTRODUCTION

- 1.1 S.A.L. Global Logistics Pty Ltd (A.C.N. 607 473 245) (S.A.L.) recognises that the privacy of personal information is important and is committed to protecting personal information that it collects and holds. The *Privacy Act 1988* (Cth) (the **Privacy Act**) and the Australian Privacy Principles set out the applicable legal requirements with respect to the management of personal information.
- 1.2 This policy sets out how S.A.L. collects, uses, discloses and otherwise manages personal information. 'Personal information' is information or opinions relating to an identifiable individual. Information is not personal information where it cannot be linked to an identified individual.
- 1.3 This policy does not apply to acts and practices that directly relate to employee records of S.A.L. current and former employees.
- 1.4 The policy is effective from 01st December 2019.

2. TYPES OF PERSONAL INFORMATION S.A.L. COLLECTS

- 2.1 The types of personal information that S.A.L. may collect and hold in relation to customers, logistics providers, employees and prospective employees include:
 - (a) contact information;
 - (b) financial information;
 - (c) banking information;
 - (d) licensing information;
 - (e) credit information; and
 - (f) information that S.A.L. is legally required to collect.
- 2.2 Visitors to S.A.L.'s business premises may be monitored using closed circuit television (CCTV) cameras in common areas of the building, although the relevant CCTV cameras are not owned or controlled by S.A.L.
- 2.3 'Sensitive information' is a special category of personal information and includes information that could have serious consequences for the individual if it is used inappropriately. S.A.L. may, with the consent of the individual, collect sensitive information about logistics providers and prospective employees including:
 - (a) drug and alcohol test results;
 - (b) criminal history; and
 - (c) membership of unions and professional associations.
- 2.4 S.A.L. will not collect sensitive information without the individual's consent to whom the information relates unless it is permitted to do so under the Privacy Act.

3. WHAT TYPES OF CREDIT INFORMATION DOES S.A.L. COLLECT?

- 3.1 In providing services to a customer, S.A.L. may collect and hold the following types of credit information:
- (a) information about any credit that has been provided;
 - (b) repayment history information and information about overdue payments; and
 - (c) information in relation to court proceedings that are initiated in relation to customer credit activities and any relevant bankruptcy or insolvency arrangements.
- 3.2 S.A.L. also uses Illion (<https://www.illion.com.au>) which provides S.A.L. with credit risk information on corporate customers. Ordinarily S.A.L. will not use Illion to obtain credit information with respect to individuals.
- 3.3 Other sources from which S.A.L. may collect credit information include:
- (a) ASIC;
 - (b) banks and financiers;
 - (c) suppliers.
- 3.4 S.A.L. may also collect personal information which may affect a customer's creditworthiness from other credit providers, such as trade referees, who may collect that information from credit reporting bodies. The types of personal information S.A.L. collects may include any of those types of personal information outlined in section 3.1 of this policy.

4. PURPOSE OF COLLECTING INFORMATION

- 4.1 S.A.L. collects the personal information of customers and potential customers to allow it to:
- (a) provide freight brokerage services;
 - (b) comply with legislative requirements; and
 - (c) provide information about any additional services S.A.L. offers.
- 4.2 S.A.L. may collect personal information via its website (www.salglobal.com.au) when that information is provided by a client voluntarily, such as by completing a form to receive updates or newsletters.
- 4.3 S.A.L.'s website may collect information including the Internet address and domain name used and the date and time of any visit together with information as to types of browsers and links followed. However, any such information is anonymous and only used for statistical purposes.
- 4.4 S.A.L. collects the personal information of prospective employees and logistics providers to allow it to:
- (a) comply with legislative requirements; and
 - (b) determine whether to offer employment or engagement to a prospective employee or logistics provider.

5. WHAT HAPPENS IF PERSONAL INFORMATION IS NOT PROVIDED?

If a person fails to provide S.A.L. with personal information that S.A.L. seeks, or if that information is inaccurate or incomplete, S.A.L. may be unable to provide that person with freight brokerage services or to consider offering that person employment or engagement.

6. HOW DOES S.A.L. COLLECT PERSONAL INFORMATION?

- 6.1 S.A.L. usually collects personal information directly from the person to whom the information relates.
- 6.2 S.A.L. may also collect personal information from:
- (a) government bodies and agencies;
 - (b) public records and registers;
 - (c) courts and tribunals;
 - (d) current and previous employers;
 - (e) recruitment agencies;
 - (f) doctors or other medical professionals who carry out health screening checks; and
 - (g) online searches and social media.

7. HOW DOES S.A.L. USE AND DISCLOSE PERSONAL INFORMATION?

- 7.1 S.A.L. uses personal information to deal with, and to provide and market services to its customers and prospective customers.
- 7.2 Personal information may be disclosed to:
- (a) S.A.L.'s logistics providers;
 - (b) government bodies such as WHS authorities, the Department of Home Affairs, the Department of Human Services, and the Australian Taxation Office;
 - (c) customers who require information from S.A.L. for their compliance procedures or to meet legislative requirements;
 - (d) entities that provide medical testing and drug and alcohol testing for S.A.L.;
 - (e) S.A.L.'s banks, finance providers, insurance providers and insurance brokers;
 - (f) Credit reporting body Ilion, in circumstances where a customer fails to meet payment obligations or commits a serious credit infringement; and
 - (g) third party technology providers including CargoWise One, which provides software to allow S.A.L. to run its freight brokerage business.

8. HOW DOES S.A.L. PROTECT PERSONAL INFORMATION?

- 8.1 S.A.L. uses various physical and electronic security measures to protect personal information held by S.A.L., including using:
- (a) security systems and other restrictions to limit access to S.A.L.'s premises;
 - (b) secure electronic databases;
 - (c) unique usernames, passwords and other protections on systems that can access personal information; and
 - (d) electronic security systems and firewalls.
- 8.2 S.A.L. also manages the personal information it collects by:
- (a) providing its staff with training on their obligations under the *Privacy Act*;
 - (b) supervising staff who regularly handle personal information;
 - (c) implementing procedures to identify and report privacy breaches and to respond to complaints about privacy breaches; and
 - (d) designating a privacy officer whose role is to manage compliance with the *Privacy Act*.

9. OVERSEAS DISCLOSURE

S.A.L. does not generally disclose personal information to overseas recipients, except that:

- (a) some of S.A.L.'s data entry functions are performed in Manila in the Philippines; and
- (b) S.A.L.'s third party technology provider, CargoWise One, has backup servers in the United States and the United Kingdom.

10. ACCESSING AND CORRECTING PERSONAL INFORMATION

- 10.1 Any person may request access to personal information about them held by S.A.L. or request that their personal information is corrected. Requests may be made to S.A.L.'s Privacy Officer by emailing privacy@salglobal.com.au.
- 10.2 If a request is made in accordance with clause 10.1, S.A.L. will take reasonable steps to:
- (a) provide access to relevant personal information that it holds; and
 - (b) correct any personal information if the data or information held is incomplete, irrelevant or misleading.
- 10.3 S.A.L. will not disclose any personal information under clause 10.1 without proof of identity.
- 10.4 S.A.L. 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.

11. COMPLAINTS

- 11.1 Complaints about a breach of the Australian Privacy Principles may be made to S.A.L.'s Privacy Officer by emailing privacy@salglobal.com.au.
- 11.2 All complaints will be responded to within a reasonable time.
- 11.3 Complaints may also be referred to the Office of the Australian Information Commissioner (see details at www.oaic.gov.au).

12. CHANGES TO THE POLICY

S.A.L. may update or modify this policy at any time without prior notice. Any changes to the privacy policy will be published on S.A.L.'s website.

