

DARYL DICKENSON TRANSPORT

PRIVACY POLICY

1. INTRODUCTION

- 1.1 D J & T E Dickenson Pty Ltd trading as Daryl Dickenson Transport ABN 46 097 895 497 (**Daryl Dickenson Transport**) offers a range of transport and storage services in Australia.
- 1.2 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.
- 1.3 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.
- 1.4 This privacy policy also incorporates our policy on managing credit information (see particularly section 8 onwards).

Who does the privacy policy apply to?

- 1.5 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 and storage services who perform services on our behalf and from prospective employees and prospective providers of transport or storage services.
- 1.6 This policy does not apply to acts and practices that relate directly to employee records of our current and former employees.

What information does the privacy policy apply to?

- 1.7 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.8 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 contractors we deal with 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 our 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 endeavour 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 provider of transport and storage services, or a prospective employee or a prospective provider of transport or storage services.

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 our services to you.

Personal information (website users)

- 3.3 Our website at www.dickensontrans.com.au automatically collects information about your computer hardware and software including:
- (a) your IP address;
 - (b) your browser type; and
 - (c) domain names, access times and referring website addresses.

Personal information (providers of transport or storage services and prospective providers of transport or storage services, and employees)

- 3.4 If you are a provider of transport or storage services, or a prospective employee or a prospective provider of transport or storage services, 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 history;
 - (e) insurance information and claims history;
 - (f) licence details;
 - (g) education details;

- (h) driving history;
- (i) banking details; and
- (j) any other personal information required to engage you as a provider of transport or storage services or to consider offering you employment.

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 providers of transport or storage services, and prospective employees and prospective providers of transport or storage services, 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 consent of the individual to whom the information relates unless this is 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) providers of transport or storage services;
 - (b) current and previous employers;
 - (c) entities that conduct drug and alcohol tests on our behalf or on behalf of our customers;
 - (d) doctors or other medical professionals who carry out health screening checks;
 - (e) from use of an intelligent access program and on-board front and back facing cameras installed in vehicles operated by us;
 - (f) trade references; and
 - (g) insurance providers 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; and
 - (b) electronically:
 - (i) on electronic storage devices, including USBs;

- (ii) by a third party data storage provider;
- (iii) through internal servers and websites and a private cloud.

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

- (a) using security systems to limit access to our premises outside of business hours;
- (b) using secure servers to store personal information;
- (c) limiting access by employees to electronic storage devices that contain personal information in line with the requirements of their position;
- (d) using unique usernames, passwords and other protections on systems that can access personal information; and
- (e) holding certain sensitive documents securely, including in locked filing cabinets.

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 packaging, distribution, storage or general freight and transport or storage services;
- (b) in the case of providers of transport or storage services – to assist us in providing our customers with high quality packaging, distribution, storage and general freight and transport and storage services; and
- (c) in the case of prospective employees and prospective providers of transport or storage services – to assess 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; and
- (b) to keep records of transactions to assist with future enquiries and enhance customer relationships.

Collection of personal information via website

6.4 We maintain records of our website and the pages you visit so we can:

- (a) monitor website traffic;
- (b) determine which of our services are popular; and
- (c) deliver customized content and advertising.

This information is collected for statistical purposes only and users are not identified from the use of these statistics.

6.5 We may collect and use personal information with respect to providers of transport or storage services:

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

6.6 We may disclose personal information to:

- (a) other providers of transport and storage services;
- (b) employers of individuals;
- (c) practitioners and entities that provide drug and alcohol testing for us or on behalf of our customers;
- (d) government bodies (such as WorkCover, Centrelink, the Australian Taxation Office, police departments, workplace health and safety authorities, state departments of mining, petroleum and natural resources, road authorities and transport authorities);
- (e) other service providers in order to provide transport or storage services, or to assist our functions or activities (such as our accountants, advisers, consultants and compliance auditors);
- (f) insurance providers and brokers;
- (g) customers of Daryl Dickenson Transport who require the information as part of their compliance procedures or systems or to meet legislative requirements; and
- (h) any third party technology providers we engage from time to time, such as email filter providers.

6.7 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 save that personal information may be stored with a private cloud provider with a data centre located in Singapore.

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 providers of transport or storage services or 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) identification information;
 - (b) information about any credit that has been provided to you;
 - (c) any repayment history;
 - (d) information about 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 a customer directly from that customer or their trade referees.

8.5 Other sources from which we may collect credit information include:

- (a) ASIC;
- (b) banks and other credit providers;
- (c) your suppliers and creditors; and
- (d) our providers of transport or storage services.

8.6 We do not collect credit information from credit reporting bodies.

How do we store and hold the credit information?

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

Why do we collect the credit information?

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

8.9 We may also collect the credit information to:

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

Overseas disclosure of the credit information

8.10 Other than any information stored with a private cloud provider (that has data centres in Singapore), 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?

8.11 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 circumstances of the request.
- 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. 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

- 9.7 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

- 9.8 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:	Rhiannon Dickenson
Postal Address:	PO Box 958, ARCHERFIELD QLD 4108
Telephone number:	(07) 3271 3047
Email address:	privacy@dickensontrans.com.au

10. CHANGES TO THE POLICY

- 10.1 We may update, modify or remove this policy at any time without prior notice.
- 10.2 This policy is effective from 1 August 2017. If you have any comments on the policy, please contact our privacy officer using the contact details in section 9 of this policy.