

PRIVACY POLICY

This Privacy Policy sets out the approach which Hannah's Haulage will take in relation to the treatment of Personal Information. It includes information on how we collect, use, disclose and keeps secure, your personal information. It also covers how we make the personal information we hold available for access to and correction by you.

This policy has been drafted having regard to our obligation under the Privacy Act 1988 (including the Australian Privacy Principles and National Privacy Principles) (the Privacy Act).

This policy is a public document and has been prepared in light of Australian Privacy Principles.

1. Collection

- 1.1 We will only collect Personal Information where the information is necessary for us to perform one or more of our functions or activities. In this context, "collect" means gather, acquire or obtain by any means, information in circumstances where you are identifiable or identified.
- 1.2 We collect personal information for a number of purposes including:
 - 1. for the provision of products and services
 - 2. for administrative purposes
 - 3. for recruitment purposes
 - 4. for purposes related to employment
 - 5. for the engagement of service providers, contractors or suppliers
 - 6. for other business-related purposes.
- 1.3 We will notify you of the matters listed below at the time of collecting any Personal Information:
 - 1. the main reason that we are collecting Personal Information (this reason will be the Primary Purpose);
 - 2. other related Uses or Disclosures that we may make of the Personal Information (Secondary Purposes);
 - 3. our identity and how you can contact us, if this is not obvious;
 - 4. that you can access the Personal Information that we hold about you;
 - 5. that you should contact us if you wish to access or correct Personal Information collected by us or have any concerns in relation to Personal Information;
 - 6. the organisations or types of organisations to whom we usually Disclose the Personal Information:

- 7. where applicable, any law that requires the Personal Information to be collected;
- 8. the consequences (if any) for you if all or part of the Personal Information is not provided to us.
- 1.4 Where it is not practicable for us to notify you of all of the Collection Information before the collection of Personal Information, we will ensure that you are notified of the Collection Information as soon as possible after the collection. We will provide "post collection notification" in those circumstances where it is not practicable to notify you about the collection of your personal information before it is collected.
- 1.5 We will not collect Sensitive Information from you except with your express consent and only where it is necessary for us to collect such information for an activity or function.
- 1.6 We will not collect Personal Information secretly or in an underhanded way.

2. Use

- 2.1 We will obtain your consent for Use of non-sensitive Personal Information for Secondary Purposes at the time of collection, unless the Use is a related Secondary Purpose which would be within your Reasonable Expectations.
- 2.2 We Uses Personal Information primarily for the purposes listed in 1.2 above.
- 2.3 If we rely on the Direct Marketing you we will ensure that:
 - 1. you are clearly notified of your right to Opt Out from further Direct Marketing; and
 - 2. if you Opt Out of all Direct Marketing the Opt Out will be respected by us and implemented free of charge.
- 2.4 We will not use Sensitive Information for Direct Marketing.
- 2.5 We may use Personal Information to avoid an imminent threat to a person's life or to public safety. It may also use Personal Information for reasons related to law enforcement or internal investigations into unlawful activities.
- 2.6 We will not use Personal Information without taking reasonable steps to ensure that the information is accurate, complete and up to date.
- 2.7 We will not attempt to match de-identified or anonymous data collected through surveys or such online devices as "cookies", with information identifying you, without your consent.

3. Disclosure

3.1 We may Disclose Personal Information to related or unrelated third parties if consent has been obtained from you.

- 3.2 We may Disclose Personal Information to unrelated third parties to enable outsourcing of functions where that Disclosure or Use is for a related Secondary Purpose and you have been notified or where such Disclosure is within your Reasonable Expectations.
- 3.3 We will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with the Use and Disclosure requirements of the Privacy Act.
- 3.4 In the rare event that we are required to disclose Personal Information to law enforcement agencies, government agencies or external advisors we will only do so in accordance with the Privacy Act or any other relevant Australian legislation.
- 3.5 We may Disclose Personal Information to avoid an imminent threat to a person's life or to public safety.
- 3.6 If a Disclosure is not for a Primary Purpose; is not for a related Secondary Purpose; or upfront consent has not been obtained, we will not Disclose Personal Information otherwise than in accordance with the exceptions set out at 3.1 to 3.6 above.
- 3.7 We do not share our customer lists on a commercial basis with third parties.

4. Information Quality

- 4.1 We will review, on a regular and ongoing basis, our collection and storage practices to ascertain how improvements to accuracy can be achieved.
- 4.2 We will take steps to destroy or de-identify Personal Information after as short a time as possible and after a maximum of seven years, unless the law requires otherwise.

5. Information Security

- 5.1 We require employees and contractors to perform their duties in a manner that is consistent with our legal responsibilities in relation to privacy.
- 5.2 We will take all reasonable steps to ensure that paper and electronic records containing Personal Information are stored in facilities that are only accessible by people within Hannah's Haulage who have a genuine "need to know" as well as "right to know".
- 5.3 We will review, on a regular and ongoing basis, our information security practices to ascertain how ongoing responsibilities can be achieved and maintained.

6. Access and Correction

- 6.1 We will allow our records containing Personal Information to be accessed by you in accordance with the Privacy Act.
- 6.2 We will correct our records containing Personal Information as soon as practically possible, upon your request and in accordance with the Privacy Act.

- 6.3 If you wish to lodge a request to access and/or correct your Personal Information you should do so by contacting us as per the details at the conclusion of this document.
- 6.4 We will not charge a fee for processing an access request unless the request is complex or is resource intensive.

7. Openness

- 7.1 Contact with us via phone or web inquiry will be the first point of contact for inquiries about privacy issues.
- 7.2 Any formal privacy related complaints should be directed in writing to the Hannah's Haulage Privacy Officer, Hannah's Haulage Pty Ltd, 81 Riverstone Parade, Riverstone, NSW 2765.
- 7.3 We will endeavour to manage any privacy related complaint efficiently and in a timely manner.
- 7.4 Our websites will contain a prominently displayed privacy statement and will include a copy of this Privacy Policy.

8. Anonymous Transactions

- 8.1 We will not make it mandatory for visitors to our websites to provide Personal Information unless such Personal Information is required to answer an inquiry or provide a service. We may however request you to provide Personal Information voluntarily to us (for example, to access downloadable content).
- 8.2 We will allow our customers to transact with the site anonymously wherever that is reasonable and practicable.

9. Transferring personal information overseas

- 9.1 We may send information overseas. For example, this may be to other Hannah's Haulage companies to better understand your business needs and how we can improve our products and services, for a related or ancillary purpose, or otherwise in accordance with the Privacy Act. We may also store, process or back-up your personal information on servers that are located overseas (including through third party service providers).
- 9.2 If Personal Information must be sent by us overseas for sound business reasons, we will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with the Australian Privacy Principles, preferably as part of the services contract.

10. Glossary

Collection Information means the information outlined in 1.3 notified to individuals prior to, or as soon as practical after, the collection of their Personal Information.

Direct Marketing means the marketing of goods or services through means of communication including written, verbal or electronic means. The goods or services which are marketed may be those of Hannah's Haulage or a Related Body Corporate or those of an independent third-party organisation.

Disclosure generally means the release of information outside Hannah's Haulage, including under a contract to carry out an "outsourced function".

Health Information means:

- 1. information or an opinion about:
- 2. the health or a disability (at any time) of an individual; or
- 3. an individual's expressed wishes about the future provision of health services to him or her; or
- 4. a health service provided or to be provided to an individual; that is also personal information; or
- 5. other personal information collected to provide or in providing a health service; or
- 6. other personal information about an individual collected in connection with the donation; or intended donation by the individual of his or her body parts or body substances.

Opt Out means an individual's expressed request not to receive further Direct Marketing.

Personal Information means information or an opinion (including information or an opinion forming part of a database), whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion.

Primary Purpose is the dominant or fundamental reason for information being collected in a particular transaction.

Reasonable Expectation means a reasonable individual's expectation that their personal information might be Used or Disclosed for the particular purpose.

Sensitive Information means:

- 1. information or an opinion about an Individual's:
- 2. racial or ethnic origin; or
- 3. membership of a political association; or
- 4. religious beliefs or affiliations; or
- 5. philosophical beliefs; or
- 6. membership of a professional or trade association; or
- 7. membership of a trade union; or
- 8. sexual preferences or practices; or
- 9. criminal record; that is also personal information; or
- 10. Health Information about an individual: or

Use means the handling of Personal Information within Hannah's Haulage.

Contacting Hannah's Haulage

If you require further information regarding Hannah's Haulage's Privacy Policy, $\underline{\text{contact}}$ $\underline{\text{us}}$.

Telephone: (02) 9627 4807