

# Sadleirs Privacy Policy

This Privacy Policy sets out how R.C Sadleir Pty Limited (008 667 052) and its related bodies corporate (**Sadleirs, we, or us**) collect, use, store, disclose and manage your personal information and how Sadleirs complies with relevant privacy laws including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Australian Privacy Principles* (**APPs**).

Sadleirs is in the business of transport, logistics, packaging and warehousing, and operates a website under the domain name: [www.sadleirs.com.au](http://www.sadleirs.com.au) (**Website**).

We are committed to protecting the privacy and security of your personal information.

By providing personal information to us, you consent to our collection, use, storage, disclosure and management of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

## 1. What Is Personal Information?

Personal information has the meaning given to it in the Privacy Act. In general terms, **personal information** is information we hold which is identifiable as being about you and includes information or an opinion about an individual (whether true or not and in whatever form) whose identity is reasonably apparent, or can reasonably be ascertained, from the information or opinion.

**Personal sensitive information** means information or an opinion about an individual's racial or ethnic origin, political opinion or associations, trade union memberships or associations, religious or philosophical beliefs, sexual orientation or practices, criminal records, health or genetic information or some aspects of biometric information.

Under the Privacy Act, personal sensitive information generally has a higher level of privacy protection.

## 2. Coverage of this Policy

This Privacy Policy explains how we manage personal information, including our obligations and rights of individuals. It applies to personal information that we manage as a result of:

- your interaction with us as a prospective, current or former employee;
- any interactions or commercial dealings you may have with Sadleirs as a business or otherwise;
- any interactions you have with Sadleirs as a shareholder; and
- your use of, and any interaction you may have with Sadleirs via our Website or systems, devices, portals (or via customer's portals), mobile applications, or any other form of technology or systems, or social media networks or apps (**Sadleirs Network**).

## 3. Consent

By engaging with us, electing to use or provide services, purchasing or supplying products or by using the Sadleirs Network, you will be deemed to have consented to Sadleirs collecting, holding, using, disclosing and handling your personal information in a manner consistent with this Privacy Policy, including monitoring your use of the Sadleirs Network.

If you do not want Sadleirs to collect, hold, use or disclose your personal information then you should not continue.

If at any time in the future, you do not wish for Sadleirs to continue to hold and use your personal information you must notify us in writing of your withdrawal of consent.

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You acknowledge that your refusal to provide personal information or withdrawal of consent may result in our inability to engage with you.

## 4. What Personal Information does Sadleirs Collect?

Sadleirs collects personal data about you to enable it to fulfill the purpose of the interaction with you. Including to effectively conduct its business and enabling it to fulfil its responsibilities as provider or receiver of logistics, transport, packaging, warehousing, and related services or products.

### ***Specific collection information for business operations, shareholder and site attendee interactions***

The information Sadleirs collects about you depends on the products, services or information that you or your employer provide to or receive from us, and our requirements for information in order to provide or receive such products or services.

We may collect the following types of personal information:

- your name, date of birth, gender and contact details including your physical address, mailing address, email address and telephone number;
- your login or user names, user settings and passwords and IP Internet Protocol (IP) address;
- bank account and credit card details;
- information to verify your identity such as your passport or driver's licence details;
- information relating to your income and credit-worthiness and credit reference checks;
- insurance information;
- provided in prospective suppliers' tenders and proposals (which may, for example, include personal biographies/CVs) and customers' applications for credit;
- your preferences for particular products, services or facilities when you tell us what they are;
- information relating to your client log-in account, including your password and username;
- other information you provide to us through our representatives or from customer surveys from time to time;
- if you hold securities, information relating to you and your security holding;
- if you are involved in an incident, details about the involvement of you and other people in the incident, witness and incident statements, CCTV footage of the incident, medical information and information from medical consultants and other consultants and third parties;
- when you visit Sadleirs premises or use its equipment, information (including your image) collected from surveillance, monitoring or other collection devices used for security, safety or data analytics purposes;
- any additional information relating to you that you provide to us directly through the Sadleirs Network or indirectly through the use of our Website, Sadleirs Network or equipment. This information may include information regarding:
  - what you viewed or visited;
  - GPS location;
  - time zone;
  - photo uploads;
  - your image or biometric information;
- if you use mobile applications developed or used by us or log in to wireless facilities provided in a Sadleirs managed site:

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- details relating to your use of the mobile application or wireless facility including but not limited to device location, time and use of the app, images and other analytical data or statistical information;
  - in case of an error in the app we may collect data and information (through third party products) on your phone called Log Data. Log Data may include information such as your IP address, device name, operating system version, the configuration of the app, time and date of your use of the app and other statistics;
  - access may be requested to your device's location, audio, camera or camera roll in order for the applications functionality; and
  - photos uploads or taken at proof of delivery stage – only the photo taken via the app is sent to the server.
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the Website, ad data, IP address and standard web log information;
  - the name, email, phone number and of an attendee at Sadleirs sites or third party sites operated by Sadleirs or its clients;
  - offline when you attend an event in which Sadleirs is involved, when you contact customer support, or when you give it a business card (or similar);
  - de-identified technical data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Sadleirs Network;
  - analytics data which we may collect directly or use third party analytics tools, to help us measure traffic and usage trends for our products and services or monitoring various aspects of our engagement with you or use of Sadleirs Network. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving our products and services; and
  - any other personal information that may be required in order to facilitate dealings with us by you or your employer or contractor.

## **Specific collection of information for recruitment or employment purposes**

### Employee records

The Privacy Act and the APPs do not apply to the management of personal information that is directly related to a current or former employment relationship and is an 'employee record'. This means that where information is an 'employee record' Sadleirs is not required to comply with the APPs when it handles current and past employee records related to the employment relationship.

### Other information outside of employee records

Sadleirs may obtain personal information about prospective and current employees and may also request information from former employees. This information may be collected:

- as part of the procedures dealing with a prospective employee's job application;
- during site attendances; and
- as part of ongoing workforce management and record keeping.

The types of information Sadleirs may collect include:

- basic information, such as name, date of birth / age, contact details and gender, image and information provided to verify your age, identity gender, racial or ethnic origin, religion, health, and disability;

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- additional information which Sadleirs may use in collaboration with service providers acting on its behalf to verify your identity or address, and to protect its business and manage its exposure to risk or to comply with its legal and regulatory obligations, which may include:
- taxpayer or government identification number, a copy of your government-issued identification, a photo of you, or other personal information; and
- information about you from third parties such as credit bureaus and identity verification services;
- psychometric, technical skills or behavioural analysis type assessments;
- information regarding your employment and educational history, any professional role, or roles for which you are applying or being considered and your relevant personal interests, attributes and career aspirations and plans;
- results of background checks (including criminal history checks, visa checks, anti-money-laundering or reference checks);
- relevant information regarding health and disabilities including medical results and drug and alcohol tests;
- qualification, credentials or licence information;
- citizenship and, where relevant, residency and work permit status and other immigration-related information;
- other information about yourself that you provide in a resume or similar document;
- information collected if you choose to provide Sadleirs with access to certain personal information stored by third parties such as social media sites (such as Facebook and Twitter):
- the information Sadleirs has access to varies by site and is controlled by your privacy settings on that site and your authorisation; and
- financial information, including information regarding business expenses and salary, pensions, insurance, and other benefits (including bank account details).

## What sensitive information do we collect and hold?

From time to time, we may need to collect sensitive information where it is reasonably necessary in our dealings with you. We will not collect, use or disclose sensitive information unless we have your consent or we are legally required to do so. For example, with your consent, we may:

- conduct criminal history or medical checks;
- collect relevant health or disability information;
- conduct random drug and alcohol tests;
- collect racial or ethnic origin details;
- if you have been involved in an accident we may collect health or medical information and results of drug and alcohol testing; and
- collect biometric data when using the Sadleirs Network or equipment or on a Sadleirs site.

## 5. How do we collect personal information?

Sadleirs approach is to collect personal information, where reasonably practicable, from the individual directly. Where this is not practical, information may be collected by lawful means from secondary sources such as government agencies, service or product providers, publicly available sources and list purchases.

Some of the ways personal information can be collected are by:

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- your access and use of Sadleirs Network and your interactions with our products, services, content or advertising;
- your communications with us, including emails, letters, conversations or other correspondence between you and our representatives;
- contractual documents, tenders and proposals and customers' credit applications and purchase orders;
- undertakings given by attendees visiting our sites and CCTV systems at our sites;
- third party sources, including marketing agencies, data collection agencies, credit reporting agencies, law enforcement agencies and other government entities, background screening providers, agencies conducting various skills and behavioural testing, third party contacts (including your business colleagues, previous employers and referees), referrals and publicly available sources;
- during meetings or interviews with us;
- via a job application with us;
- attending one of our events or giving us a business card;
- health information may be collected from drug and alcohol testing providers or from third parties conducting medical checks;
- from visiting our premise or work sites and use of Sadleirs equipment or performing services for Sadleirs;
- from third parties providing services or products to Sadleirs; and
- witnesses, CCTV footage, medical and other consultants and third parties in the case of incidents in which you are involved.

If you provide us with, or authorise us to collect, personal information about a third party, you confirm that they have authorised you to provide us with, or authorise us to collect, their personal information in accordance with this Policy and that you have informed them of their rights to access and request correction of their personal information, as set out in this Policy.

## **Cookies and collection personal information via Sadleirs Network**

We use cookies and similar technologies (such as web beacons and proprietary measurement software) on the Sadleirs Network to analyse trends, administer our services, diagnose problems, improve the quality of our products and services, track users movements around the Sadleirs Network, and to gather demographic information about our user base as a whole.

A cookie is a small text file that the Sadleirs Network may place on your device to store information. We may use persistent cookies (which remain on your device even after you close your browser or app) to store information that may speed up your use of the Sadleirs Network for any of your future visits to the Sadleirs Network. We may also use session cookies (which no longer remain after you end your browsing session or close the app) to help manage the display and presentation of information on the Sadleirs Network. You may refuse to use cookies, web beacons or some of the proprietary measurement software features by selecting the appropriate settings on your browser or the settings section of your mobile or tablet device. However, please note that if you do this, you may not be able to use the full functionality of the Sadleirs Network.

Sadleirs uses both internally built software and third party vendors for the collection, aggregation and analysis of some data (such as Microsoft Azure) when using the Sadleirs Network.

## **Refusal to provide personal information**

You may decide not to provide some personal information to us. If so, Sadleirs will attempt reasonably to accommodate this but may be unable to:

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- provide or receive some or all of the requested products or services to or from you;
- provide you with information about the products and services that you may want to provide or receive;
- tailor the content of Sadleirs Network to your preferences and your experience of the Sadleirs Network may not be as enjoyable or useful;
- process your enquiry, complaint, request or application; or
- permit you entry onto Sadleirs or Sadleirs-operated sites.

## 6. Uses of Personal Information

### **SADLEIRS DOES NOT COLLECT PERSONAL INFORMATION FOR THE PURPOSE OF SELLING IT TO THIRD PARTIES**

Sadleirs will only use or disclose personal data for the primary purpose for which it was collected or for a secondary purpose which is directly related to the primary purpose or as otherwise permitted by law.

We will use the personal information collected to enable us to carry out our business and to enable us to complete the purpose of our interactions with you, including (but not limited to):

- supplying or receiving products or services;
- transacting with you;
- responding to your queries;
- enforcing the terms and conditions of our engagement with you;
- ensuring compliance with our statutory obligations;
- providing quality assurance for our services or products;
- monitoring the performance of our business; or
- promotional and educative activities.

We may also use your personal information in:

- considering prospective employees employment applications.

### **Does Sadleirs use personal information for direct marketing communications?**

We or third party services providers we engage 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 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.

## 7. When do we share your personal information?

We may need to share your personal information with other parties as part of our business and, where we do so, we will take steps to ensure these parties are required to protect your information. These may include specialist information technology companies, cloud service providers, mail houses or other contractors who help us to deliver our services.

We may from time to time review information held about you in our systems, including your email and other communications with, us for compliance and business-protection purposes as described in this Policy. This may include reviews of information for the purposes of disclosure of information in legal

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proceedings, regulatory enquiries or criminal investigations. To the extent permitted by applicable law, these reviews will be conducted in a reasonable and proportionate way and approved at an appropriate level of management. This may ultimately involve disclosure of your information to governmental agencies or other third parties as described below.

You agree that we have the right to share your personal information with:

- any member or employees of the Sadleirs corporate group, including our related bodies corporate;
- select third parties including (but not limited to):
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - contract service providers, including customer service staff, consultants, advisers, IT and internet service providers;
  - analytics and search engine providers that assist us in the improvement and optimisation of the Sadleirs Network including our Website;
  - outside entities providing various screening or verification checks;
  - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
  - professional advisers, consultants or insurers; and
  - entities involved in a proposed sale or transfer all or a portion of our business or assets;
- your colleagues within the organisation that you represent (in terms of your contact details and your role); and
- any entity we are required to disclose your personal information to, either by law or court order (including government agencies and litigation counterparties).

We will take reasonable steps to ensure that third party recipients are required to handle your personal information in a manner that is consistent with the principles described in this Policy and applicable privacy laws.

## 8. Disclosure of personal information outside Australia

Some of our suppliers and agents are based overseas and we may need to send or provide them with access to your personal information so that they can provide services to us or to you.

Some countries may not provide the same level of protection for your personal information as the APPs.

By submitting your personal information, you agree to this collection, transfer, storing or processing of your personal information. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Policy and any applicable laws, but you acknowledge that where we transfer this personal information overseas there is an increased level of risk to the security of your personal information.

## 9. Security of Information

Sadleirs maintains appropriate administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

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Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Sadleirs Network, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Personal information is held in electronic databases maintained within Sadleirs Network and/or in hardcopy records stored in secure access facilities. We require our employees and contractors to protect the confidentiality of the personal information we hold.

All electronic data is sent securely using the latest security standards over HTTPS and stored securely on a cloud server hosting the main Web application for sole use by Sadleirs or Sadleirs clients as per permissions granted to them by Sadleirs Administrators. The server is located in a secure Microsoft Azure data centre which is located within Australia. The information is accessed by Sadleirs in accordance with Microsoft Azure's security and privacy policy.

We value your trust in providing us your Personal Information, thus we strive to use commercially acceptable means of protecting it. However, there are no methods of transmission over the internet, or method of electronic storage that is 100% secure and reliable, and we cannot guarantee its absolute security.

## 10. Risks to other sites

The Sadleirs Network may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. You should review the Privacy Policy of those websites and those entities. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## 11. Access to and correction of personal information?

We will take reasonable steps to ensure that the personal information that we collect remains accurate, up to date and complete. If you would like to correct or update your personal information that we hold, you can send a request to us using the details below.

We will provide you with access to your personal information held by us unless we are permitted under applicable privacy law to refuse to provide you with such access.

If you would like to access any of your personal information that we hold, you can send a request to us using the details below. Your request should set out, in reasonable detail, a description of the information that you would like to access. Before providing access, we may require certain information from you to verify your identity.

There is no charge for requesting access to your personal information, but we may charge you a reasonable fee before we provide you with access to meet our costs of doing so.

We will respond to all requests for access and/or correction of personal information within a reasonable time.

## 12. Overseas collection

In some circumstances, personal information collected in Australia from an individual located overseas might be subject to additional protection under the laws of the local jurisdiction. For example, the European Union General Data Protection Regulation (GDPR) provides additional protection in certain circumstances to individuals located in the European Union, and the UK Data Protection Act 2018 may in some cases extend similar protection to individuals located in the United Kingdom. Where this is the case, there may be additional rights and remedies available to you under foreign law in the event that your personal information is handled in a manner inconsistent with that law.

## 13. Breaches of Privacy Policy

All suspected breaches will be investigated, and appropriate disciplinary and remedial action taken. Employees who do not strictly comply with this Privacy Policy may face disciplinary action, including counselling, formal warnings or dismissal.

## 14. Changes to Privacy Policy

We reserve the right to change this Privacy Policy at any time. We will notify you of the changes by publishing an updated version of the Policy on our Website.

## 15. How can I make a query or complaint about privacy?

If you have any enquiries about this Privacy Policy or wish to make a complaint about how we have handled your personal information, or to withdraw your consent, you can contact us at:

Attention: General Counsel  
R.C. Sadleir Pty Limited  
470 Belmont Avenue  
Kewdale WA 6105

Telephone: 08 9333 2444  
Email: [privacy@sadleirs.com.au](mailto:privacy@sadleirs.com.au)

If you are unhappy with a decision made by Sadleirs in relation to your complaint or how Sadleirs has handled your personal information, you may make a complaint to the Australian Information Commissioner.