



## PRIVACY POLICY

### 1. INTRODUCTION

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- 1.1 Exodas Pty Ltd (ACN 102 448 868) (**Exodas**) and Evergreen Freight Pty Ltd (ACN 604 741 399) (**Evergreen**) (together referred to as **Exodas Group**) recognise that the privacy of personal information is important, and are committed to protecting personal information that they collect and hold. *The Privacy Act 1988* (Cth) (the **Privacy Act**) contains the Australian Privacy Principles (**APP**) that set out the legal requirements with respect to the management of personal information, with the exception of certain employee records.
- 1.2 This policy sets out how Exodas Group 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 Nothing in this policy prevents Exodas Group from collecting or disclosing personal information that comprises employee records of current or former employees, provided such collection or disclosure does not breach the Privacy Act.
- 1.4 The policy is effective from 9<sup>th</sup> April 2024.

### 2. TYPES OF PERSONAL INFORMATION WE COLLECT

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- 2.1 The types of personal information that Exodas Group may collect and hold in relation to subcontractors, employees, and prospective subcontractors and employees includes:
  - (a) contact information including an individual's name, date of birth, address, telephone number, email address, signature, identification (ID) documents and emergency contact information;
  - (b) recruitment information including application forms, interview documentation, reference checks or screening information and qualifications;
  - (c) employment history including any promotions or demotions, performance reviews and disciplinary records;
  - (d) medical information including medical testing, details of leave of absences or workplace accidents or injuries;
  - (e) GPS data and other telemetry from in-vehicle management systems (IVMS) and other logistics technology solutions, including Navman, Viewtrack and Future Fleet;
  - (f) Video footage from cameras in vehicles and in Exodas Group's premises;
  - (g) financial information, including bank account details;
  - (h) licensing information; and
  - (i) information that Exodas Group is legally required to collect, including tax and superannuation records, and documents as described in clause 2.3.
- 2.2 The types of personal information that Exodas Group may collect and hold in relation to customers, suppliers (other than subcontractors) and recipients of goods, includes:
  - (a) contact information including name, address, telephone number, signature, email address;



- (b) recruitment information including application form/s, interview documentation, reference checks or screening information;
- (c) video footage from cameras in Exodas Group's business premises;
- (d) billing and financial information including bank details and credit card details linked to a customer's account;
- (e) licensing information;
- (f) details of any enquiries or complaints;
- (g) information that Exodas Group is legally required to collect; and
- (h) in the case of customers, credit information, the management of which is explained in clause 3 of this policy.

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. Exodas Group may, with the consent of the individual, collect sensitive information about subcontractors and employees and prospective subcontractors and employees, including:

- (a) medical history;
- (b) drug and alcohol test results;
- (c) criminal history; and
- (d) membership of unions and professional associations.

2.4 Exodas Group will not collect sensitive information without the consent of the individual to whom the information relates unless it is permitted to do so under the Privacy Act.

2.5 Exodas Group collects video recordings and photographs from in-vehicle cameras and closed-circuit television cameras at its business premises. Exodas Group also collects data through use of infra-red technology and video footage as part of the Guardian Seeing Machines technology installed in Exodas Group's vehicles.

### **3. TYPES OF CREDIT INFORMATION WE COLLECT**

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3.1 In providing services to a customer, Exodas Group 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 Sources from which Exodas Group may collect credit information include:

- (a) Australian Securities and Investment Commission (ASIC);
- (b) banks;



- (c) suppliers; and
- (d) Exodas Group's subcontractors and agents.

3.3 Exodas Group 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 Exodas Group collects may include any of those types of personal information outlined in clause 3.1 of this policy.

#### **4. COLLECTION OF PERSONAL INFORMATION THROUGH THE WEBSITE**

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- 4.1 Exodas Group's website provider may make and maintain records of Exodas Group's official website and the pages you visit so that they can:
- (a) monitor website traffic;
  - (b) determine which of our services are popular; and
  - (c) deliver customised content or advertising.
- 4.2 The Exodas Group website also uses cookies. A cookie is a text file that is placed on your hard disk by a webpage server. Cookies are uniquely assigned to you, and can only be read by a webserver in the domain that issued the cookie to you. A cookie notifies the webserver that you have returned to a specific page. For example, if you personalise Exodas Group's webpage or register with Exodas Group' site, a cookie:
- (a) helps Exodas Group to recall your specific information on subsequent visits; and
  - (b) simplifies the process of recording your personal information, such as your billing address and delivery address.
- 4.3 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.

#### **5. PURPOSE OF COLLECTING INFORMATION**

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- 5.1 Exodas Group collects the personal information of subcontractors and employees and prospective subcontractors and employees to allow it to:
- (a) manage any employment or engagement relationship, including to assess performance, and for health and safety purposes;
  - (b) comply with legislative requirements; and
  - (c) determine whether to offer employment to a prospective employee.
- 5.2 Exodas Group collects personal information from in vehicle monitoring systems and closed-circuit television cameras:
- (a) to prevent and detect crime;
  - (b) to assist in providing a safe working environment;
  - (c) to protect Exodas Group's property and the property of their customers, subcontractors, agents and visitors; and



(d) for quality and compliance purposes.

5.3 Exodas Group collects the personal information of customers and potential customers to allow it to:

- (a) provide transport services;
- (b) comply with legislative requirements; and
- (c) provide information about any additional services Exodas Group offers.

5.4 Exodas Group does not collect personal information for the purposes of selling it to third parties.

## **6. WHAT HAPPENS IF PERSONAL INFORMATION IS NOT PROVIDED?**

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If a person fails to provide Exodas Group with personal information that they seek, or if that information is inaccurate or incomplete, Exodas Group may be unable to provide that person with transport services or to consider engaging or employing that person.

## **7. HOW DO WE COLLECT PERSONAL INFORMATION?**

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7.1 Exodas Group usually collects personal information directly from the person to whom the information relates.

7.2 Exodas Group 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 and labour hire providers;
- (f) doctors or other medical professionals who carry out health screening checks;
- (g) in-vehicle camera data and closed-circuit television camera data;
- (h) in-vehicle management systems (IVMS) and other logistics technology solutions including Navman GPS tracking; Viewtrack and Future Fleet;
- (i) document scanning and fingerprint scanning; and
- (j) online searches (such as google) and social media (such as Instagram or X).

## **8. HOW DO WE USE AND DISCLOSE PERSONAL INFORMATION?**

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Personal information may be disclosed to:

- (a) Exodas Group's subcontractors;
- (b) entities that conduct licence checks for Exodas Group;



- (c) government bodies such as Workplace Health and Safety, the Department of Human Services, the National Heavy Vehicle Regulator (NHVR), State and Territory Road authorities including the Department of Transport and Main Roads (DTMR), Department of Home Affairs and the Australian Taxation Office (ATO);
- (d) customers who require information from Exodas Group for their compliance and audit procedures or to meet legislative requirements;
- (e) third party service providers engaged by Exodas Group to provide services such as insurers, IT support providers and banks;
- (f) entities that provide medical testing and/or drug and alcohol testing for Exodas Group;
- (g) third party technology providers including Navman, Viewtrack and Future Fleet, which provide software to allow Exodas Group to run its transport business.

## **9. HOW DOES EXODAS GROUP PROTECT PERSONAL INFORMATION?**

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- 9.1 Exodas Group uses various physical and electronic security measures to protect personal information held by Exodas Group, including using:
- (a) security systems and other restrictions to limit access to Exodas Group's premises;
  - (b) secure electronic databases;
  - (c) unique usernames, passwords kept in a digital vault, protections such as two factor authentication (2FA) on systems that can access personal information;
  - (d) electronic security systems and firewalls;
  - (e) mail filtering software that blocks potential cyber threats;
  - (f) multifactor Authentication (MFA) regarding business apps and certain programs;
  - (g) anti-ransomware, anti-virus and anti-spyware measures deployed on computer systems;
  - (h) limitations of access of information according to management levels and users of data;
  - (i) cloud based software services to manage logistics and email services; and
  - (j) locked filing cabinets.
- 9.2 Exodas Group 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.



## 10. OVERSEAS DISCLOSURE

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Exodas Group does not generally disclose personal information to overseas recipients. Exodas Group's software providers may store or back up data overseas. Some information may be sent overseas to Philippines in relation to outsourcing of compliance activities and data entry.

## 11. ACCESSING AND CORRECTING PERSONAL INFORMATION

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- 11.1 Any person may request access to personal information about them held by Exodas Group , or request that their personal information is corrected.
- 11.2 Requests may be made to Exodas Group's Privacy Officer by emailing [compliance@exodas.com.au](mailto:compliance@exodas.com.au)
- 11.3 If a request is made in accordance with clause 11.1, Exodas Group 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.
- 11.4 Exodas Group will not disclose any personal information under clause 11.1 without proof of identity.
- 11.5 Exodas Group 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.

## 12. COMPLAINTS

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- 12.1 Complaints about a breach of the Privacy Act may be made to Exodas Group's Privacy Officer by emailing [compliance@exodas.com.au](mailto:compliance@exodas.com.au) or telephoning (07) 3382 7507 or writing to:

**Privacy Officer:** Leah Hanrahan

**Postal Address:** PO Box 1172

OXENFORD, QLD 4210

- 12.2 All complaints will be responded to within a reasonable time.
- 12.3 Complaints may also be referred to the office of the Australian Information Commissioner (see details at [www.oaic.gov.au](http://www.oaic.gov.au)).



### 13. CHANGES TO THE POLICY

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Exodas Group may update or modify this policy at any time.

*Policy Owner – Exodas Pty Ltd*

*Policy Effective Date – 9<sup>th</sup> April 2024*

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