

GKR Privacy Policy

This Privacy Policy applies to the management of your personal information (**PI**) by or on behalf of Flemington Fields Pty Ltd (ABN 94 009 240 635) trading as GKR Transport (**GKR, we, us, our**).

We have created this privacy policy in order to demonstrate our commitment to the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) (together, the **Australian Privacy Law**). It sets out how we may collect, hold, use or disclose your PI.

What PI do we collect?

'Personal Information' is information or opinion about an identified individual, or an individual who is reasonably identifiable. We may collect and hold PI such as your name, phone number or mobile telephone number, email, IP address, physical address, occupation, financial information, employment history, gender, professional qualifications, licences held, residency status, date of birth, criminal records, tax file numbers, forklift or driver's licence or passport numbers, and bank details. We may also collect financial information, including credit reports and related credit information and credit eligibility information, information about your income, bank(s) or financial circumstances.

Our policy is to only collect your sensitive information (such as health information of prospective and current employees) where it is reasonably necessary for our functions or activities and either you have consented or we are required or authorised under law to do so.

How we collect your PI?

We collect your PI as part of us offering or providing our products or services. This includes when you provide your PI to us via our website, during phone or video calls, when you apply for credit terms, or otherwise via customer dealings or enquiries. We may also collect PI when you create an account with us or use our technology such as OneFlo, SendIT and our other logistics and freight management platforms including those licensed to us by third parties ("**GKR Systems**"). Generally, we collect your PI directly from you but we may also collect your PI from other people or organisations if you have given consent to do so.

We may collect PI through third parties, including from recruiters or, if you have an item sent to you by someone who uses our services. For example, when you send an item using our services or someone else sends an item using our services that is addressed to you, we will receive the details of the item including the weight and dimensions of the item and other shipping information, including the sender and recipient details. This information allows us to provide our products and services and to respond to queries from the sender.

We may also collect credit-related information from credit reporting bodies (see details in our Credit Reporting Policy below) or from other credit providers where permitted by the Privacy Act.

Why do we need your PI?

We only collect or hold your PI where it is reasonably necessary for our business functions or activities.

In particular, we need your PI to provide you with our products and/or services which includes communicating with you (such as via direct marketing) about our products and/or services, creating and updating our database(s), invoicing, billing & debt recovery functions, ensuring compliance with our contractual and other legal obligations to you, to determine if we will accept your credit application and any guarantees provided, assessing credit worthiness, reviewing existing credit terms, internal record-keeping, internal management purposes, and administering our relationship with you including by responding to your enquiries (**Main Purposes**).

How do we use your PI?

By submitting your PI to us, you consent to us using your PI for:

- (a) the Main Purposes;
- (b) any purpose related to one of the Main Purposes, and any purpose that could reasonably be expected at the time your PI was collected (**Secondary Purpose**);
- (c) any purpose to which you otherwise consent (including as disclosed to you in an information collection statement at the point where we collect your PI); and
- (d) any other purpose required or authorised by law (including the Australian Privacy Laws).

If you do not consent to our collection and use of your PI, we may not be able to carry out some or all of the Main Purposes, or provide you with products, services or information.

Secondary Purposes may include: providing you with or improving and maintaining our products or services; sending you direct marketing about our products or services, deals and promotions; conducting customer surveys; managing our relationship with you; monitoring how you interact with us on our website or other contact points and helping you to complete an activity that you have chosen to undertake.

We may use certain non-personally identifiable information (such as anonymous usage data, IP addresses, browser type etc.) to improve the user experience, quality and design of our website or our GKR Systems (and including the security and stability of our website or GKR Systems), and to create new features, promotions, functionality and services by storing, tracking, analysing and processing user preferences and trends as well as user activity and communications. We may also disclose your PI to other businesses owned by us for use in the manners described above. We utilise 3rd party platforms to provide anonymised analytics and insights regarding platform and website performance and usage patterns of users.

Can you remain anonymous or use a pseudonym?

We will, if practicable, allow you to use a pseudonym or to not identify yourself (unless this is impractical or against the law (including the Australian Privacy Law)).

In some instances, if you do not provide us with certain PI we may not be able to provide you with the relevant product, service or information. This may have an effect on whether we can begin or continue a relationship with you or provide our products and services to you.

What disclosures will we make?

Generally speaking, we will disclose your PI for the Main Purposes. We may also disclose your PI for the Secondary Purposes, any purpose to which you otherwise consent (including as disclosed to you in any information collection statement at the point where we collect your PI) and any other purpose required or authorised by law (including the Australian Privacy Laws).

We may disclose your PI to our related entities (including any directors or shareholder that may reside outside of Australia, including in countries such as Singapore), our professional advisors (including lawyers, accountants and auditors), credit-reporting bodies for identity checking and credit related purposes such as credit-worthiness (for more information see the Credit Reporting Policy below) and to our partners, suppliers and distributors in order to assist us in providing our products or services to you.

Some of our service providers, or the services they provide (like cloud storage services), or our directors or shareholders may be based outside Australia. In order to protect PI, we take care where possible to work with service providers who we consider maintain acceptable standards of data security compliance and we do our part to meet those standards as they apply to us. By providing us with PI, you consent to PI being used, stored and disclosed

overseas (and acknowledge that no additional obligations that may apply to the overseas disclosure of personal information under Australian Privacy Laws will apply).

Is your PI confidential and secure?

We take all reasonable steps to keep the PI we hold secure and to ensure it is protected against misuse, loss, unauthorised access, modification or inappropriate disclosure. We may hold PI in both hard copy and electronic forms or other recorded forms and will do so in secure systems accessible only to authorised personnel.

Do we use “cookies”?

When you visit our website(s), our service may tell your browser to store a "cookie" on your computer. A cookie is a small text file that can be used to store user preferences and information that allows our services to identify you when you're logged in or visiting our website. We, or 3rd party platforms we utilise, may use cookies to track and analyse your user experience to better understand what products or services may be of interest to you and to collect statistical information. We may also use cookies to store a user's username and email address on their computer for future visits to our website.

Using other sites

This site may contain links to other websites. Unless the other website is one of our sites, we are not responsible for the privacy practices of the owners of those websites. We recommend that you read the privacy policy of any website that asks you to provide your PI.

Changes to our Privacy Policy

We may need to change this Privacy Policy from time to time. When we do amend it, the changes will be effective immediately upon being made public on our website. We will use reasonable measures to notify you of any relevant changes to this privacy policy, but please be aware that it is your responsibility to review our Privacy Policy regularly and make sure you keep up to date with any changes.

Contacting us about privacy and accessing your personal information

You can access your PI subject to certain limitations under the Australian Privacy Law. In most cases, a summary of your PI is available free of charge. We encourage you to contact us to update your PI to ensure that it is accurate, current and complete. We will take reasonable steps to process your request.

As a security measure, we may require you to confirm your identity before access to your PI is granted. If necessary, reasonable costs may be charged to you in accessing your PI, subject always to the Australian Privacy Law.

If you have a question or want to make a complaint about how we handle your PI, please contact us using the details below. We will review all queries and complaints received and will respond to each query/complaint upon due consideration (which may require further information from you). We will, where reasonably possible, take steps to investigate and resolve complaints within 30 days. If we need more time, we will notify you about the reasons for the delay and seek to agree a longer period with you (if you do not agree, we may not be able to resolve your complaint). If we cannot resolve a complaint related to your PI, you may contact the Office of the Australian Information Commissioner (“**OAIC**”) directly.

We can be contacted via:

Email: Privacy@gkrtransport.com.au

Phone: 1300 769 605

Post: Flemington Fields Pty Ltd, Attention: Group General Counsel, Morris Moor, Ground Floor, 1 Cochranes Road, Moorabbin, VIC 3189

Or for more information about privacy issues in Australia and protecting your privacy, please visit the OAIC website at www.oaic.gov.au.

Last updated: September 2021

GKR Credit Reporting Policy

We may provide credit as contemplated in the Privacy Act to our customers in connection with our products and services (for example, credit term accounts). We therefore may collect credit information and credit eligibility information about you or give this information to credit reporting bodies as set out in the Privacy Act 1988. Our Credit Reporting Policy sets out how we manage that information.

This credit reporting policy relates to Flemington Fields Pty Ltd (ABN 94 009 240 635) trading as GKR Transport (**GKR, we, us, our**) that are deemed to be credit providers or affected information recipients for the purposes of the Privacy Act 1988 (Cth).

What credit information and credit eligibility information do we collect?

We may collect credit information about you in connection with an application for credit and in any of the circumstances relating to other personal information detailed in the “What PI do we collect?” section of our Privacy Policy. If you apply for any kind of credit or offer to act as guarantor, we may disclose your personal information to, or collect personal information about you from, a credit reporting body.

Credit information can include (a) identification information; (b) information relating primarily to your credit related dealings with us and covers various types of information that can be collected by Credit Reporting Bodies (“CRBs”) that report on consumer credit worthiness including your or your guarantees’ financial position; (c) financial information relating to companies seeking credit terms, directors, partners, trustees, sole traders and any person who acts or proposes to act as a guarantor; (d) basic information about your credit account including repayment history information; (e) historical solvency information of directors, partners, trustees, sole traders or managers associated with a business applying for credit (f) details about information requests we make about you to CRBs, (g) information about certain overdue payments, serious credit infringements; and (h) various publicly available information like bankruptcy and credit-related court judgements.

Credit eligibility information is information equivalent to the types set out above that are generally obtained from CRBs. This information relates primarily to your dealings with other credit providers (i.e. banks, other financial institutions and entities that may provide you with credit in connection with their goods or services). It may also include certain credit worthiness information that is derived from data collected from a CRB or other credit reporters.

We store and secure your credit information and credit eligibility information in the manner described in the “Is your PI confidential and secure?” section of our Privacy Policy.

How do we use and disclose your credit information and credit eligibility information?

Credit information and credit eligibility information disclosed to us is principally used for in connection with your application for credit to assess that application and for the ongoing management of a credit account and otherwise as permitted by law. This may involve any of the following uses:

- (a) processing credit-related applications (including assessing your credit worthiness and assessing credit guarantees (current and prospective)) and includes obtaining consumer and commercial credit reports from CRBs) and managing the ongoing credit that we provide;

- (b) assisting you if we think you may be at risk of default;
- (c) collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements;
- (d) providing or exchanging personal information with any person whose name is provided to us in connection with your application for credit (including trade references);
- (e) internal management purposes;
- (f) participating in the credit reporting system and providing information to CRBs as permitted by the Privacy Act 1988;
- (g) dealing with complaints or regulatory matters relating to credit or credit reporting; and
- (h) as required or permitted by the Privacy Act 1988 or another law.

We may disclose your credit information to CRBs who may then include that information in credit reports they provide to other credit providers to assist those credit providers assessing your credit worthiness.

We may disclose your credit information to our debt recovery agents, who may use this to assist us in recovering debt owed to us.

We may also use and disclose your credit information for other purposes and in other circumstances as set out in the "How do we use your PI?" and "What disclosure will we make?" sections of our Privacy Policy, when permitted to do so by the Privacy Act 1988.

In some cases, the people to whom we may disclose your credit information or credit eligibility information may be based outside Australia – for more information please see the details under the "What disclosure will we make?" section of our Privacy Policy.

Credit reporting bodies to who we may share credit –related personal information include:

- (a) National Credit Insurance (Brokers) Pty Ltd, 7/432 St Kilda Rd, Melbourne VIC 3004, Tel: 1800 882 820, E: info@nci.com.au, www.nci.com.au
- (b) Equifax Australian Group Pty Ltd (formerly known as Veda), PO Box 964, North Sydney NSW 2059, Tel: 138332, www.mycreditfile.com.au/
- (c) Experian Australia Credit Services Pty Ltd, Level 6, 549 St Kilda Road, Melbourne VIC 3004, Tel: 1300 784 684, www.experian.com.au
- (d) Creditor Watch, GPO Box 276, Sydney, NSW, 2001, Tel: 1300 501 312, E: support@creditorwatch.com.au, www.creditorwatch.com.au/
- (e) Illion Australia (formerly trading as Dun and Bradstreet (Australia) Pty Ltd), 479 St Kilda Rd, Melbourne VIC 3004, <https://www.creditcheck.illion.com.au/>, Telephone: 1300 734 806

These CRBs are each required to have a policy which explains how they will manage your credit-related personal information. To view the policy of any of these CRBs please visit the relevant CRB's website and follow the "Privacy" links, or you can contact them directly for further information.

We may also disclose credit related personal information to our debt recovery agents, who may use this to assist us in recovering debt owed to us.

Accessing and correcting your credit information or credit eligibility information

If you wish to access or correct errors in any of your credit information or credit eligibility information that we hold, please contact us using the contact details set out in the “Contacting us about privacy and accessing your personal information” section of our Privacy Policy.

We will assist you with accessing and correcting any of your credit information or credit eligibility information that we hold as described in the “Contacting us about privacy and accessing your personal information?” section of our Privacy Policy. There is no charge to make a request for access but we may apply an administration fee as permitted by the Privacy Act 1988 for providing access in accordance with your request.

How do you make a complaint?

If you think that we have not complied with Part IIIA of the Privacy Act or with the Credit Reporting Privacy Code (which regulates credit reporting) you can make a complaint by using the contact details set out in the “Contacting us about privacy and accessing your personal information” section of our Privacy Policy.

We will, where reasonably possible, take steps to investigate and resolve complaints within 30 days. If we need more time, we will notify you about the reasons for the delay and seek to agree a longer period with you (if you do not agree, we may not be able to resolve your complaint). If we cannot resolve a complaint related to your PI, you may contact the Office of the Australian Information Commissioner (“**OAIC**”) directly.

Statement of Notifiable Matters under the Credit Reporting Privacy Code

Under the Credit Reporting Privacy Code, there are several ‘notifiable matters’ that we are required to disclose to you at or before the time of collecting personal information that is likely to be disclosed to a credit reporting body.

Those matters are:

- a) the credit reporting body may include the credit information we provide to it in reports, which it then provides to other credit providers to assist those other credit providers to assess your credit worthiness;
- b) if you commit a serious credit infringement, we may disclose this to a credit reporting body;
- c) you can request a copy of this Credit Reporting Policy by contacting us, or obtain it directly from our website;
- d) you can request a copy of the relevant credit reporting bodies’ credit reporting policy from its website or by contacting them directly by mail. see above details under the section “Credit reporting bodies to whom we may share credit –related personal information include:”.
- e) you have the right to access credit information we hold about you, request that we correct the information, and make a complaint, as set out further in the remainder of this Credit Reporting Policy;
- f) you can request a credit reporting body not to use your credit reporting information for the purposes of pre-screening of direct marketing by us, and
- g) you can request a credit reporting body not to use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud.

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Version	Doc No.	Date	Description of Change	Compiled	Authorised
1.0	LHA GOV_03	September 2021	Initial Issue post acquisition	Group General Counsel	LHA CEO