



INTERNATIONAL FREIGHT FORWARDERS

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PRIVACY POLICY

INTRODUCTION

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. PAC (Pacific Air Cargo) is committed to complying with the Privacy Act 1988 (Cth) (Privacy Act) in relation to all personal information we collect. PAC's 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. This privacy policy also incorporates PAC's policy on managing credit information.

WHO AND WHAT INFORMATION DOES THE POLICY APPLY TO?

This policy applies to any person in relation to whom PAC currently hold, or may in the future collect, personal information. Broadly, PAC only collects personal information from customers, subcontractors and agents who perform services on our behalf, and from prospective employees and prospective subcontractors.

This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.

Information is not personal information where the information cannot be linked to an identifiable individual.

HOW DOES PAC MANAGE THE PERSONAL INFORMATION WE COLLECT?

PAC manages 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 agents or contractors who deal with PAC 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 the business to monitor privacy compliance.

PAC 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.

Because the nature of PAC's business primarily involves packaging, transporting, storage, distribution and international 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 our clients 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 PAC, you should notify us and we will try to accommodate your request, subject to our ability to perform the services under international law.

WHAT KINDS OF INFORMATION DOES PAC COLLECT AND HOLD?

The personal information PAC may collect differs, depending on whether you are:

- a) a customer;
- b) a subcontractor or agent; or
- c) prospective employee or a prospective subcontractor.

Personal information (customers)

If you are a customer, PAC 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 the services to you.

Personal information (website users)

PAC's website at www.pacificaircargo.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 (subcontractors, agents and prospective employees and subcontractors)

If you are a subcontractor, agent, or a prospective employee or prospective subcontractor, PAC 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) credit information;
- g) licence details;
- h) records obtained from on-board monitoring systems in vehicles and cameras installed in vehicles;
- i) education details;
- j) driving history
- k) banking details; and
- l) any other personal information required to engage you as our subcontractor or agent, or to consider offering you employment.

Collection via PAC's website including use of cookies

The Pacific Air Cargo website at www.pacificaircargo.com.au uses 'cookies', 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 personalize the PAC webpage or register with our site, a cookie:

- a) helps PAC to recall your specific information on subsequent visits;
- b) simplifies the process of recording your personal information, such as your billing address and delivery address.

You have the capability 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.

Sensitive information

'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately. Generally, PAC does not collect sensitive information about customers. However, we may collect sensitive information from and about subcontractors and agents, and prospective employees and subcontractors, such as:

- a) health information (including but not limited to medical screening tests and drug and alcohol testing results);
- b) criminal history;
- c) membership of professional or trade associations; and
- d) membership of trade unions.

PAC will not collect sensitive information without the individual's consent to which the information relates unless permitted under the Privacy Act.

HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?

PAC's usual approach to collecting personal information is to collect it directly from the individual concerned. We may also collect personal information in other ways, such as from:

- a) our subcontractors and agents
- b) your current and previous employers;
- c) entities that conduct drug and alcohol tests on our behalf;
- d) doctors or other medical professionals who carry out health screening checks;
- e) trade references; and
- f) insurance providers and brokers; or
- g) directly, using in-vehicle management systems.

HOW DOES PAC HOLD PERSONAL INFORMATION?

PAC's usual approach to holding personal information includes holding that personal information:

- a) physically, at our premises; and
- b) electronically, on secure servers; and
- c) in both private and public clouds.

PAC secures the personal information we hold in numerous ways, including:

- a) using security systems to limit access to premises outside of business hours;
- b) using secure servers to store personal information;
- c) using unique usernames, passwords and other protections on systems that can access personal information; and
- d) holding certain sensitive documents securely.

WHY DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

PAC takes 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, storage, distribution or international freight and transport services;
- b) in the case of subcontractors and agents – to assist us in providing our customers with high quality packaging, storage, distribution or international freight and transport services;
- c) in the case of prospective employees and subcontractors – to assess suitability for employment or engagement; and
- d) in the case of agents, and employees – in order to ensure safe and efficient work practises.
- e) Personal information may also be used or disclosed by PAC for secondary purposes that are within an individual's reasonable expectations and that are related to the primary purpose of collection.

Collection of personal information – customers

In addition to the primary purpose set out above, PAC may also collect and use customers' personal information:

- a) to assess eligibility for credit;
- b) to keep records of transactions to assist in future enquiries and enhance our customer relationships;
- c) to send special offers in relation to our services; and
- d) to send details of offers of third parties that may be of interest. In such instances, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party.
- e) PAC does not sell, rent or lease customer lists or information to third parties.

Collection of personal information – subcontractors and agents

In addition to the primary purpose set out above, PAC may collect and use subcontractors' and agents' personal information:

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

Collection of personal information via website

PAC maintains 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.

Disclosure of personal information

PAC may disclose personal information to:

- a) subcontractors and agents;
- b) employers of individuals;
- c) practitioners and entities that provide drug and alcohol testing and other medical testing for us;
- d) government bodies (such as Centrelink, Department of Customs and road transport authorities);
- e) other service providers in order to provide the freight or transport service, or to assist our functions or activities (such as our advisers and consultants);
- f) insurance providers and brokers;
- g) customers of Pacific Air Cargo PTY LTD who require the information as part of their compliance procedures or systems or to meet legislative requirements; and
- h) any third party technology providers PAC engages from time to time, such as email filter providers and Cargowise Systems who maintain our specialised freight software.

Otherwise, PAC will only disclose personal information to third parties if permitted by the Privacy Act.

WILL PAC DISCLOSE PERSONAL INFORMATION OUTSIDE AUSTRALIA?

Because of the international nature of PAC's business personal information may be disclosed outside of Australia. We take reasonable steps to ensure this personal information is handled in a safe and secure manner.

HOW DOES PAC MANAGE YOUR CREDIT INFORMATION?

What kinds of credit information may PAC collect?

We generally do not collect credit information about subcontractors and employees. In the course of providing our services to a customer, we may collect and hold the following kinds of credit information:

- a) your identification information;
- b) information about any credit that has been provided to you;
- c) your repayment history;
- d) information about your overdue payments;
- e) whether terms and conditions of your credit arrangements with PAC 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.

PAC may also collect personal information that may affect a customer's creditworthiness 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 the earlier section of this policy.

How and when do we collect credit information?

In most cases, PAC will only collect credit information about you directly from a customer or their trade referees.

Other sources PAC may collect credit information from include:

- a) credit reporting bodies such as National Credit Insurance or Dunn & Bradstreet;
- b) commercial debt collecting businesses such as National Credit Insurance or Dunn & Bradstreet;
- c) ASIC;
- d) banks and other credit providers;
- e) your suppliers and creditors; and
- f) our subcontractors and agents.

How does PAC store and hold the credit information?

PAC stores and holds credit information in the manner outlined in earlier section of this policy.

Why do we collect the credit information?

PAC's usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with our services. We may also collect the credit information to:

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

Overseas disclosure of the credit information

PAC will not disclose your credit information to entities without an Australian link unless you allow us to.

How can I access my credit information, correct errors or make a complaint?

You can access and correct your credit information, or complain about a breach of your privacy in the manner set out in the below section of this policy.

HOW DO YOU MAKE COMPLAINTS OR ACCESS AND CORRECT YOUR PERSONAL OR CREDIT INFORMATION?

It is important that the information PAC holds about you is up-to-date. You should contact us if your personal information changes.

Access to information and correcting personal information

You may request access to the personal information held by PAC or ask us for your personal information to be corrected by using the contact details in this section. PAC will grant you access to your personal information as soon as possible, subject to the request circumstances. In keeping with PAC's commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.

PAC 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.

PAC 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 PAC holds 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.

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. PAC 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:

A person may make a complaint, or request to access, or correct personal information about them held by PAC. Such a request must be made in writing to the following address:

National General Manager
Jason Osborne
20 Harvey Street North
Eagle Farm, Brisbane
QLD 4009 Australia
Toll Free 1800 735 665
jason@pacificaircargo.com.au

CHANGES TO THE POLICY

PAC may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.

All business transacted in accordance with our (revised 2020) Standard Trading
Conditions. Copies are available upon request.