Privacy Policy

CEN-PCT-POL-186

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1. PURPOSE

1.1 Centurion Transport Pty Ltd (the Company), believes privacy is an important right of individuals. The Company acknowledges its obligations under the Privacy Act 1988 (Cth) (the Privacy Act) and is committed to collecting personal information in accordance with this policy and ensuring it is protected from misuse and breaches.

1.2 The Company acknowledges that personal information can be used to identify a person and should only be used by the Company in limited circumstances. Personal information concerning employees is confidential and it will only be used by the Company for relevant purposes.

2. COMMENCEMENT OF POLICY

2.1 This amended Policy will commence from 22 April 2020. It replaces all other company Privacy Policies (whether written or not).

3. APPLICATION OF POLICY

3.1 This policy applies to all current, former and prospective employees of the Company.

4. EXCLUSION UNDER THE PRIVACY ACT

4.1 This privacy policy does not apply to personal information collected, or otherwise obtained, by the Company in relation to current and former employees which relates directly to the employment relationship that exists, or existed, between the Company and its current and former employees.

4.2 This exclusion does not apply to personal information provided by prospective employees as part of the recruitment and selection process who are not employed by the Company.

5. DEFINITIONS

5.1 Terms used in this Policy have the same meaning as they do in the Privacy Act.

5.2 "**Personal information**" refers to information or an opinion about employees which an employee's identity can reasonably be ascertained. This includes any personal information or opinions about the person, whether true or not, no matter how the information or opinions are recorded. The Company only collects personal information that is required for a specific purpose such as recruitment, selection, training, development, consulting, or counselling.

a) Personal information collected by the Company includes: your name; your contact details (including emergency contact details); employment history; details of any relevant licences you hold, such as your driver's licence; your banking and superannuation details; your tax file number; educational qualifications; educational qualifications; details of your eligibility to work in Australia (eg, passport or visas); and certain other details such as your date of birth, gender and occupation.

5.3 "**Sensitive information**" is a special category of personal information and includes information about a person's health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, sexual preference or criminal record. The Company will not disclose a person's sensitive information without the person's consent, unless there is a need to disclose such information in accordance with the Privacy Act or to comply with any other legislation.

5.4 "**Employee record**" is a record of personal information relating to the employment of the employee. This may include health information about an employee including personal information relating to; the engagement, training, disciplining, resignation or termination of employment of an employee; the terms and conditions of employment; the employee's personal and emergency contact details; leave records;

taxation, superannuation or banking details; and the employee's salary or wages.

5.5 "**Primary purpose**" means the dominant reason for the information being collected.

"**Secondary purpose**" means another reason that is not the dominant reason for the information being collected.

6. OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

6.1 This Policy will be available upon request to those listed in clause 3 at any time and on the Company's website.

6.2 If any person or body requires further information about this policy or has a question relating to the Company's collection, storage or use of personal information they should contact the Company's Human Resources (HR) Department via phone on 08 9278 3000, email at recruitment@centurion.net.au or post to PO Box 3000, Perth WA 6054.

7. ANONYMITY AND PSEUDONYMITY

7.1 In most circumstances, the Company will require individuals to identify themselves when communicating with the Company to allow the Company to better assist them.

7.2 However, in circumstances where it is lawful and practicable to do so, the Company will provide individuals with the option of not identifying themselves, or using a pseudonym, when entering into communications with the Company.

8. COLLECTION OF SOLICITED PERSONAL INFORMATION

8.1 The Company will only collect personal information by lawful and fair means where reasonably necessary for business functions or activities a provider of transport logistics and warehousing services.

8.2 The Company collects personal information which:

a) Prospective employees provide in the course of applying for employment with the Company;

b) Is provided to the Company by third parties, such as labour hire companies and medical providers, who have disclosed that information with the consent of the individual that it concerns (and only if it would be unreasonable or impracticable to collect the information directly from the individual);

c) Is provide to the Company in the course of an employee updating or changing their personal details;

d) Is contained in documents or correspondence provided to the Company by the Individual; or

e) Is provided to the Company by the Individual in person, by phone, by post, via our website or via other forms of electronic communication, including social media.

8.3 Subject to certain exceptions under the Privacy Act, the Company only collects sensitive information about an individual if the individual consents to the collection of the information and the information is reasonably necessary as defined in clause 8.1.

8.4 The provision of sensitive information to the Company on a voluntary basis, for example information supplied when applying for a position with the Company, will be taken to be consent for this purpose.

8.5 In all cases, the Company will take reasonable steps in the circumstances to communicate why it is collecting an individual's personal information and how it will be used at the time of collection.

8.6 The Company utilise 'cookies' which enables the monitoring of traffic patterns and to serve users more efficiently if they revisit the Company website. A cookie does not identify an individual personally but it

does identify their computer. Individuals can set their browser to notify them when cookies are being used to provide individuals with an opportunity to either accept or reject it in each instance. If an individual rejects a cookie, some parts or features of the website may not function as intended.

9. COLLECTION OF UNSOLICITED PERSONAL INFORMATION

9.1 From time to time, the Company may receive personal information about an individual which was not requested.

9.2 Where personal information is received about an individual which has not been requested (whether directly from an individual or from a third party), the Company will consider, within a reasonable period, whether it could have collected that personal information from the individual had it been requested.

9.3 Where the Company determines that it could have collected the personal information had it been requested, the Company will store, use and disclose that personal information in the accordance with this policy.

9.4 Where the Company determines that it could not have collected the personal information had it been requested, the Company will destroy or de-identify that personal information as soon as practicable, provided it is lawful and reasonable to do so.

10. USE OR DISCLOSURE OF PERSONAL INFORMATION

10.1 The Company may collect, store (in hard copy or electronic form), use or disclose personal information for the primary purpose of conducting and supporting its business activities. The Company may also collect, store, use or disclose personal information:

a) in relation to an application for employment;

b) to contact an individual should the Company need to do so;

c) to address any enquiries, complaints or feedback from individuals; or

d) To do anything the Company is required or authorised by law to do.

10.2 Further to clause 10.1, the Company may disclose an individual's personal information to:

a) Third parties, such as labour hire companies, medical providers, external training providers and travel agents, where the individual has given consent (express or implied);

b) Government agencies or other similar entities as required or permitted by law; and

c) Professional advisors, contractors or other service providers whom the Company may engage from time to time to carry out, advise or assist with the carrying out of business activities of the Company.

10.3 The Company will not use personal information for a secondary purpose unless:

a) The Company obtains consent to the use or disclosure or the individual would reasonably expect the Company to use it for a secondary purpose which is related to the primary purpose;

b) the use or disclosure is required or authorised by law; or

c) The use or disclosure is otherwise permitted by the Privacy Act (for example, as a necessary part of an investigation of suspected unlawful activity).

10.4 Employees of the Company are not permitted to disclose confidential or personal information which is collected by the Company about its suppliers, customers, agents or contractors. If an employee is not sure whether information is confidential or personal, they must check with the HR Department or their immediate manager.

10.5 Confidential and personal information is information that is not in the public domain. It includes, but is not limited to, the following types of information:

a) any personal information about an individual which has been collected by the Company;

b) any information about a supplier, customer, agent or contractor of the Company;

c) any personal information about an employee or colleague (including a prospective or former employee); and

d) Any information about the Company's business affairs or business systems.

11. PROSPECTIVE EMPLOYEES AND JOB APPLICANTS

11.1 The Company collects personal information from prospective employees and job applicants in the recruitment process. A failure by an applicant to provide any lawfully requested information may result in the processing of the application being delayed or may result in the application being unsuccessful.

11.2 Any information which is provided by a prospective employee or job applicant which is later found to be false may result in the application being unsuccessful. If the person is employed, it may result in the termination of their employment.

11.3 If a job applicant applies for a job and their application is unsuccessful but they would like the Company to hold on to their application to consider them for other positions which may arise from time to time, the applicant should provide their written consent to the Company to do so.

12. CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

12.1 The Company does not send personal information to third parties located overseas.

13. ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

13.1 Where the Company collects personal information, it will usually be identified by a common identifier, such as a name, address or contact details.

13.2 Subject to certain exceptions under the Privacy Act, the Company will not disclose identifiers assigned by Government agencies or its agents, such as tax file numbers, or use those identifiers to identify personal information.

14. DIRECT MARKETING

14.1 Unless requested otherwise, the Company may also use personal information for marketing purposes to send news, information about business activities and general promotional material which the Company believes may be useful or of interest to you. If an individual does not want the Company to use their personal information in this manner, they should contact the HR Department using the contact details in clause 6.2 of this policy.

15. SECURITY OF PERSONAL INFORMATION

15.1 The Company will take reasonable steps to protect data from misuse, interference and loss, and from unauthorised access, modification or disclosure. This includes restricting access to both hard copy and electronic documents which contain personal information.

15.2 The Company also takes reasonable steps to destroy or permanently de-identify personal information which is no longer needed for the purposes described in this privacy policy.

16. ACCESS TO PERSONAL INFORMATION

16.1 Subject to any exceptions in the Privacy Act, if an individual provides personal information to the Company, they have a right to request access to it.

16.2 If an individual is of the belief that the Company holds personal information relating to them and they wish to obtain access to this information, they should contact the HR Department. The HR Department may ask for proof of identity when requesting a correction or access to personal information.

16.3 In the event that a request for access is made, the Company will review its records to determine what personal information relating to the individual we hold and endeavour to respond to the request within a reasonable period after the request is made, but in any event, within 30 days.

16.4 If the Company does have personal information stored relating to an individual who has requested the information, the Company will provide access to the information in the manner requested, if it is reasonable and practicable to do so.

16.5 The Privacy Act provides that there may be circumstances that permit the Company to refuse to provide an individual with access to their personal information. If the Company refuses to give access to personal information it will provide written notice detailing the reasons for the refusal and the mechanisms available to complain about the refusal.

17. CORRECTION OF PERSONAL INFORMATION

17.1 The Company takes reasonable steps to keep personal information as accurate, complete and up-to- date as possible. The Company make an effort to ensure this data is of high quality, but this relies on the accuracy and frequency of data provided by individuals.

17.2 Each employee has the ability to update majority of their personal details through the self-service payroll system. Personal information that cannot be updated through the self-service system should be directed to the HR Department via communication channels listed in clause 6.2.

17.3 If the Company holds personal information about an individual and they request that it be corrected, the Company will take reasonable steps to rectify the situation free of charge if it is satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. If the Company refuses to correct personal information, a written notice detailing reasons for the refusal and the mechanisms available to complain about the refusal will be provided.

18. COMPLAINTS, QUESTIONS OR FURTHER INFORMATION

18.1 If an individual wishes to make a complaint about a breach of privacy by the Company, they should contact the HR Department using the contact details provided in clause 6.2.

18.2 All complaints will be investigated by an appropriately qualified representative of the Company. The Company will endeavour to resolve complaints as quickly as possible and, in any event, within 30 days. Complainants will be notified of the outcome of the investigation, including proposed resolutions to the complaint and what, if any, corrective measures will be implemented.

18.3 If a complainant is not satisfied with the Company's handling of the complaint, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

19. BREACH OF POLICY

19.1 Any breach of this Policy may result in disciplinary action up to and including termination of employment.

20. VARIATIONS

20.1 The Company reserves the right to vary, replace or terminate this policy from time to time.

21. DOCUMENT CONTROL

Summary Information

Aspect	Details
Document Name	Privacy Policy
Document Reference	CEN-PCT-POL-186
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Revision History

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