

Privacy Policy

Kings Consolidated Group Pty Ltd Pty Ltd ACN 109 784 803 (“Kings”) is committed to protecting your privacy and personal information.

This policy sets out:

- what is considered personal information;
- what personal information we collect and hold;
- how we collect, hold, use or disclose personal information;
- the purposes for which we collect personal information;
- what happens if we are not able to collect personal information;
- how to seek access to and correct your personal information;
- what happens if there is a data breach;
- whether we disclose personal information outside Australia; and
- how to contact us.

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recently updated policy and we will give you notice of our revised policy by posting to our Website.

WHAT IS PERSONAL INFORMATION

When used in this policy, the term “personal information” has the meaning given to it in the *Privacy Act 1988* (Cth) (“**the Act**”). In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card, direct debit or PayPal account information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD

We may collect the following types of personal information:

- name;
- mailing or street address;
- geo-location and location data;
- email address;
- telephone number;
- age or birth date;
- payment information and records;
- company details (including company name, address, ABN and TFN);

- details of what you have purchased from us or which of our services you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries; and
- any additional information relating to you that you provide to us directly through our website, by phone or in person, or information you have provided indirectly through use of our website or online presence through our representatives or otherwise.

We will only collect personal information from you with your prior knowledge and consent. You can access our website and browse our applications without disclosing personal information.

COOKIES

In some cases we may also collect your personal information through the use of cookies and other tracking devices. When you access our website, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website, without bothering you with a request to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online services and the service we provide at Kings. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our website (including IP addresses) via cookies. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

HOW WE COLLECT PERSONAL INFORMATION

We collect your personal information directly from you unless it is unreasonable or impractical to do so.

We do this in ways including:

- through your access and use of our website;
- through someone else who has provided us with your information;
- during conversations between you and us via phone; and

- when you complete a purchase order.

We may also collect personal information from third parties including:

- third party companies such as law enforcement agencies and other government entities;
- e-commerce platforms;
- data suppliers;
- advertisers;
- mailing lists; and
- contractors and business partners.

WHY WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide our customers with the best customer experience. We collect, hold, use and disclose your personal information for the following purposes:

- to provide booking services to you so that you can use our transport and logistics services;
- to provide you with news or information about upcoming events or other services;
- to communicate with you, including but not limited to, by email, mail, SMS or telephone;
- to manage and enhance our online services and our transport and logistics services;
- to allow third party organisations to contact you to arrange the creation of service delivery accounts (eg. the Kings transport management software application);
- to personalise and customise your experience;
- to provide you with access to protected areas of our websites;
- to conduct promotions on behalf of Kings and selected third parties;
- to verify your identity;
- to provide as part of business data to third parties if you have authorised us to do so;
- to provide to our contractors or external service providers where it is reasonably necessary for us to deliver our services to you;
- to conduct business processing functions for operation of our websites or our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- to provide your updated personal information to us or external service providers;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION

If you do not provide us with the personal information described in this policy, some or all of the following may happen:

- we may not be able to provide you with the services you requested, either to the same standard, or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounted services or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information to:

- our employees, contractors or external service providers for the operation of our website or our business, fulfilling requests by you, and to otherwise provide our services to you, including without limitation IT systems administrators, third party software developers or payment processors;
- our existing or potential agents and/or business partners;
- our sponsors, or promoters of any competition or promotion that we conduct or promote via our services;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Privacy Act).

THIRD PARTY LINKS AND WEBSITES

You may find links to third party websites via our website or in material we provide to you. We are not responsible for the content or practices of any third party website or business. We advise you check the privacy policy and terms and conditions of any third party website or business before using their services.

DIRECT MARKETING MATERIALS

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including by post, SMS or email, in accordance with applicable marketing laws, such as the *Spam Act 2004* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link), or by contacting us using the details below. We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing unless expressly authorised by you.

Even if you do opt out of receiving marketing communications from us, you agree that we may still send you information relevant to the supply of any services arranged by us.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us at enquiries.vic@kingstransport.com.au.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You may request access to any personal information we hold about you at any time by contacting us at enquiries.vic@kingstransport.com.au. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge you for simply making a request and will not charge you for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

We request that you keep your information as current as possible so that we may continue to improve our service to you.

HOW YOU CAN COMPLAIN ABOUT A BREACH OF PRIVACY

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy, please contact us at enquiries.vic@kingstransport.com.au and provide details of the incident so that we can investigate it.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

If you are not satisfied with the outcome of our investigation, then you may request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

DISCLOSURE OF PERSONAL INFORMATION OUTSIDE AUSTRALIA

We use Fujitsu Australia Pty Ltd ACN 001 011 427 (**Fujitsu**) to provide our transport management software application (**TMS Platform**) and are required to disclose personal information to them so we can deliver our service to you. Fujitsu are a company incorporated in Australia, however they access personal information we collect from you from locations in New Zealand. We disclose to Fujitsu your name, email, shipping and billing address, payment details, company details (including phone number, Australian Business Number and Tax File Number) phone number, IP address, geo-location and device data. Any personal information that we provide to Fujitsu is subject to its own privacy policy and the jurisdiction of Australia, New Zealand and the Philippines, whichever is applicable. You can read the Fujitsu privacy policy here - <http://www.fujitsu.com/au/about/local/info/privacy/>.

We use MICROSOURCING INTERNATIONAL LTD, a Hong Kong based corporation with registered office at Room 52, Level 9, Central Building, 1-3 Pedder Street, Central, Hong Kong to perform back office and support functions to deliver our service to you. Microsourcing operate out of the Philippines and access data from our data centre located here in Australia. We disclose to Microsourcing your name, email, shipping and billing address, payment details, company details (including phone number, Australian Business Number and Tax File Number) phone number, IP address, geo-location and device data. You can view the Microsourcing privacy policy here - www.microsourcing.com/MPI_Privacy_Policy_v1.0.pdf

We use ONEHALF STAFFING SOLUTIONS, an Australian based corporation with registered office at Suite 203, Level 2, 22-29 St Kilda Road, St Kilda, 3182 to perform back office and support functions to deliver our service to you. OneHalf operate out of the Philippines and access data from our data centre located here in Australia. We disclose to OneHalf your name, email, shipping and billing address, payment details, company details (including phone number, Australian Business Number and Tax File Number) phone number, IP address, geo-location and device data. You can view the Onehalf privacy policy here - <http://onehalf.com.au/privacy-policy/>

We may also disclose personal information to other countries including the United States of America, and countries in Europe, the Middle-East and Africa. If we need to disclose personal information to other overseas persons or entities, we will take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

SECURITY

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

If we suspect any misuse or loss of, or unauthorised access to, your personal information we may inform you of that suspicion and take immediate steps to limit any further access to, or distribution of, your personal information. Where any misuse or loss of, or unauthorised access to, your personal information may be an Eligible Data Breach as defined in the Notifiable Data Breaches scheme in Part IIIC of the Act, we will conduct an assessment to determine whether the breach is likely to result in serious harm to you. If we suspect or find that an Eligible Data Breach has occurred, and we are unable to prevent the likely risk of serious harm with remedial action, we will take action in accordance with our Data Breach Response Plan.

LINKS

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

DESTRUCTION OR DE-IDENTIFICATION OF UNSOLICITED INFORMATION OR INFORMATION NO LONGER REQUIRED

If we receive unsolicited personal information that we are not permitted to collect under this privacy policy, or within the confines of the law, we will destroy or de-identify the unsolicited personal information as soon as practicable if it is lawful and reasonable to do so. We will destroy or de-identify your personal information if we no longer require it to deliver our services as soon as practicable if it is lawful and reasonable to do so.

CHANGES TO OUR PRIVACY POLICY

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated in May 2018.