

Privacy Policy – ABC Couriers & Transport Services Pty Limited.

Updated: November 2025

1. Introduction and Background

ABC Couriers & Transport Services Pty Limited (ACN 074 480 676), ABC Logistic Services Pty Limited (ACN 089 516 030) ("**ABC**", "**we**", "**us**", and "**our**") provides time critical and special handling, transportation and logistics management for many diverse industries and businesses. We also offer specialty transportation and logistics services for the medical sector.

We are committed to the open and transparent management of personal Information and protecting your personal Information and in sharing the secure handling of personal information in accordance with the *Privacy Act 1988* (Cth) ("**Act**") and the Australian Privacy Principles ("**APPs**") contained in the Act.

This privacy policy ("**Policy**") is designed to give you a greater understanding of how we collect, use, disclose and otherwise handle manage your personal information and what are your rights. A copy of this policy is available on our website, or you can request a copy by contacting our Privacy Officer (details under Section 17 below).

2. What is Personal Information

"**Personal Information**" has the meaning given to it in the Act and is information or an opinion about you as an identified individual or an individual who is reasonably identifiable whether or not the information or opinion is true or not and whether the information or opinion is in recorded in a material form or not.

"**Sensitive Information**" is a subset of personal information that is generally afforded a higher level of privacy protection, such as information about an individual's racial or ethnic origin, political opinions, membership of political associations, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practices, criminal record, health information, genetic information that is not otherwise health information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or biometric templates.

3. Our obligations

We are required to comply with the Australian Privacy Principles ("**APPs**") in the Privacy Act 1988 (Cth) ("**Act**"). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection, to use and disclosure, security, accessibility and disposal. We are also required to comply with more specific privacy legislation in some circumstances.

Creating Solutions In The Face Of Challenges.

4. What personal information do we collect from you

We only collect Personal Information you choose to give us.

The types of personal information collected by us may differ, depending on the circumstances of collection and the type of service you request from us and whether you are, or would like to become a customer, partner, supplier, employee or independent contractor.

If you are an employee of a customer, partner, supplier or independent contractor, we may require you to provide us with certain Personal Information in order to provide you with secure access to our services.

Generally, the Personal Information collected by us includes your full name, email address, residential, billing and/or postal address, and mobile or other telephone numbers, unique identifiers. It may also include job title and job history.

For our commercial customers, our customers' customers, partners and business partners, and suppliers we may also require company details including ABN, and/or ACN and GST status, details of the services provided by ABC to you, emails, phone numbers, addresses, contact names and titles, customer information for deliveries, including proof of delivery (POD), previous credit history and credit rating, rates/cost charges for deliveries, financial and banking information about you and/or your companies you represent and any additional information that you provide to us in writing, verbally, directly through our website or indirectly through use of our website or online presence.

We mainly collect the following kinds of information and exchange this information with credit reporting bodies and other entities; credit liability information, repayment history information which is information about whether you make your payments on time, default and payment information and/or court proceedings information.

From our employees and/or prospective employees we collect several different types of information, including, but not limited to, verification of identity such as driver licence, passport, Medicare card, birth certificate, photo, Immi Card, descent certificate, criminal/police checks, employment status, gender, bank account details, emergency contact details, qualifications, previous employment details, medical and health information including allergies, leave summaries, wages and salary information, date of birth, superannuation information, tax file numbers, employment history including reference checks, resumes, certifications and qualifications, where relevant visa and immigration information and information relating to performance and conduct, biometric time and attendance systems such as fingerprint, facial, palm or iris scans to record work time and for security purposes.

From our subcontractors and/or prospective subcontractors verification of identity such as driver license, passport, Medicare card, birth certificate, photo, Immi Card, descent certificate, criminal/police checks, employment status, gender, bank account details, emergency contact details, qualifications, previous employment details, medical and health information including allergies, leave summaries, wages and salary information, date of birth, superannuation information, tax file numbers, employment history including reference checks, resumes, certifications and qualifications, where relevant visa and immigration information and information relating to performance and conduct, biometric time and attendance systems such as fingerprint, facial, palm or iris scans to record work time and for security and legal

purposes, roads authority check (points and driver license validation), Company registration e.g. ACN and ABN/information, GST status and agreement rates, earnings, tolls.

We do not otherwise collect Sensitive Information.

In some circumstances, you may deal with us anonymously or using a pseudonym. However, in most circumstances it is in practical to do so because if you do not provide us with the personal information that we require or if you provide it in a way that does not identify you, we are unlikely to be able to provide the services requested by you.

4. How do we collect your Personal Information?

4.1 Information collected directly

We collect Personal Information in a number of ways including:

- From you directly unless it is unreasonable or impractical to do so;
- From you when you make a telephone or online enquiry about using our services;
- Through your access and use of our website and website forms;
- During conversations between you and our representatives (e.g. via our call centre, sales representatives);
- When you complete an account application, consignment note or other ABC documentation;
- Third Party service providers (e.g. freight brokers, contractors);
- Automated systems (e.g. GPS Tracking, CCTV);
- Regulatory and compliance documentation;
- When you are an employee of ABC;
- When you apply for a job at ABC;
- When you apply to become a subcontractor/driver at ABC.

We may also collect Personal Information via third parties including:

- Where you benefit from our services, but you are not our direct customer, for example where you are a receiver of a delivery, we will attempt to collect your contact details from the sender (i.e. our customer) so that we can perform our services and deliver the goods to you. Where we collect your Personal Information via third parties, we shall attempt to confirm with the third-party that they have obtained your consent to our collection of your Personal Information;
- From third-party companies such as credit reporting agencies, law enforcement entities and agencies and other government entities.

What happens if we cannot collect your Personal Information?

If you do not provide us with the Personal Information described above some or all of the following may happen; ABC may not be able to;

- Provide the services as requested by you, either to the same standard or at all;
- Provide you with information about services that you may need;
- Tailor our services to your needs;
- Provide employment or contract of carriage work for you.

4.2 Information Collected Automatically

We may also collect the following categories of Personal Information automatically when you visit our website or use our services, and we may disclose this information to our Service Providers and anyone else you expressly authorise:

- Device/IP Information such as: IP address, device ID, domain server, hardware and software attributes such as Type of device/operating system/browser/time zone;
- Web analytics such as web page interactions, referring web page, non-identifiable request IDs, statistics associated with the interaction between device or browser and our website;
- Geolocation information such as: IP-address based location information, GPS Data.

4.3 Cookies

We use cookies and similar technologies to help us learn about our website visitors and customer base for the purposes of improving our services and the way in which we offer those services.

Cookies are small pieces of data – usually text files – placed on your computer or similar device when you access our websites. We may supplement the information we collect from you with information received from third parties, including third parties that have placed their own cookies on your devices.

We use “session” cookies to keep you logged in while you use our services, to better understand how you interact with our services, and to monitor aggregate usage information. We use “persistent” cookies to recognise you when you use our website or services, and to remember your preferences. We may also use web beacons, tags, and scripts on our website and services to help us understand how our website and services are used, what other websites our visitors have visited, and when an email is being opened and acted upon so that we can improve our services.

We also use Google Analytics, a web analytics service provided by Google, Inc. (“Google”), to help analyse how people use our services, compile reports and improve the quality and relevance of our services. The information generated by Google Analytics is transmitted to, and stored by, Google and is subject to Google’s [privacy policies](#).

We also use Google Tag Manager (“GTM”) a tag management system that allows users to manage and deploy marketing and analytics codes, or “tags,” on a website or mobile app without needing to directly edit the site’s code. GTM itself does not use cookies or collect personal data; it enables the deployment of analytics and marketing tags. The data generated by these cookies may be transmitted to and processed by Google on servers in the United States.

You can learn more about how Google uses this information at <https://policies.google.com/privacy> or opt out of Google Analytics tracking at <https://tools.google.com/dlpage/gaoptout>

Of themselves, cookies do not contain any information that personally identifies users, but Personal Information that we store about you may be linked to the information stored in and obtained from cookies. You have the option to either accept or refuse cookies and to know

when cookies are being sent to your device. If you do not wish to receive any cookies, you may set your browser to refuse them. However, this may result in some features of our website not functioning properly and we accept no liability to you for this.

5. Unsolicited information

Unsolicited personal information is Personal Information we receive that we have taken no active steps to collect (such as an employment application or CV sent to us by an individual on their own initiative, rather than in response to a job advertisement or information received from a website request for a quote, as a guest). We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

6. Purpose for which we use and disclose your Personal Information

The primary purposes for which your Personal Information will be used and disclosed is to enable us to:

- To perform our business activities and functions including providing, courier; messenger, transport and logistic services, including but not limited to services such as air freight, First Flight, road freight, logistics and warehousing;
- To provide the best possible customer service;
- To manage deliveries and freight tracking;
- To respond to inquiries and feedback regarding our business and our services;
- Conducting appropriate credit checks;
- Monitoring the performance of business, our contractors and employees and our services;
- Enforcing the terms and conditions of our engagement with you;
- For the management of our database;
- To ensure safety and compliance with road transport laws;
- To communicate with our clients, customers, suppliers and contractors;
- To comply with legal, statutory and regulatory obligations.

We also collect, hold, use and disclose your Personal Information for the following purposes.

- To provide services to you;
- To send communications requested by you;
- To answer inquiries by you and/or your customers;
- To engage your services and/or contracts of carriage for contractors and employees;
- To provide information and/or advice about our existing and/or new services;
- To provide you with access to protected areas of our website;
- To assess our performance and to improve our operation;
- To assess your application for credit with ABC;
- To conduct business processing functions including providing Personal Information to our subcontractor's, suppliers and/or other third-parties;
- For the administrative, marketing planning and service development and business analysis of ABC;
- To comply with any law, rule, regulation, unlawful and binding determination, decisional direction of a regulator.

We use and disclose information we hold about you as an employee and/or subcontractor of or incidental to our role as your employer or principal and in accordance with applicable laws.

We will only use Personal Information for the purpose for which it was collected or for related purposes as permitted by law.

7. Direct Marketing

We do not engage in direct marketing. If we decide to do so in the future, we will seek your consent and provide a simple method for you to opt out of receiving marketing material.

8. To Whom may we Disclose your Information

We may disclose your Personal Information to:

- Subcontractors or to our other service providers including, without limitation, web hosting providers, IT systems advisors, consultants, advisors, suppliers and other third-parties with whom we have commercial relationships, for business, marketing and related purposes;
- Logistics providers;
- Regulatory bodies and Government authorities (e.g. Transport NSW, NHVR);
- Legal and compliance advisors;
- Accountants;
- Law enforcement agencies (where required);
- Any organisation for any authorised purpose with your express consent;
- Credit agencies, such as Credit Watch, Dun & Bradstreet and Equifax.

Prior to disclosing any of your Personal Information to another person or organisation will take all reasonable steps to satisfy ourselves that:

- the personal organisation has a commitment to protecting your Personal Information as per the APPs; or
- you have consented to us making the disclosure.

9. Sharing Personal Information with Third Parties

ABC will share Personal Information with other parties in specific cases only for the purpose of providing services for you, for example when this is necessary for the implementation of ABC's agreement with you, when this is legally obliged or requested by a competent authority, when you have given permission to do so or if ABC has a legitimate interest or reason for so doing.

As there are some shipments and requests, we do not handle ourselves, it is possible, that we ask another courier, transport or logistics party to process your shipment and use, companies, agencies, airlines and shipping companies. To be able to complete your shipment, we will only provide the data strictly necessary to those parties.

We will not sell your Personal Information to third parties.

Please note if you contact us by email, the content will be screened for malicious content by and stored at an external party located in Australia.

10. Use of government related identifiers

We will not:

- use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or
- otherwise use or disclose such a government related identifier,

unless this is permitted by the Act (for example, use of an identifier to verify an individual's identity or uses or disclosures required or authorised by or under an Australian law).

11. Security

We are committed to ensuring the security of your Personal Information and will take all reasonable steps to protect it from misuse, interference, accidental loss, damage or destruction, unauthorised access, modification or disclosure including:

- Having secure premises and secure access to our premises and databases/records;
- Having a secure server and database storage located in Sydney, Australia;
- Using encrypted communications where practicable;
- Security restrictions on access to our computer systems and network (such as login and password protection);
- Access controls including but limited to taking measures to restrict access to personnel who need that information in order for us to be able to provide our services;
- Technological measures for computer and network protection, such as computer passwords, data backup, antivirus software and firewalls; and
- Regular audits and risk assessments.

Will take all reasonable steps to ensure your Personal Information is accurate and kept up-to-date and complete and is relevant for the purposes for which it may be used pursuant to this Policy.

Personal information is retained only as long as necessary for business or legal purposes.

Please note that our website does not provide systems for secure transmission of Personal Information across the Internet, except where otherwise indicated. When emailing or providing Personal Information to us by our website, please be aware that there are risks involved in transmitting Personal Information via the Internet.

Our Policy requires that you do not provide bank account information via email or our website. Bank account information should only be provided in person, by secure text message or by telephone to one of our authorised representatives.

Our website may contain links to other Internet sites. We have no control over the privacy practices employed at other websites and we accept no responsibility for the collection, use and disclosure of your Personal Information by other Internet sites. We strongly

advise you to review the privacy policies of such websites. We have no control over and assume no responsibility for the content, policies or practices or any third-party sites or services.

We cannot provide a guarantee with respect to the security of your Personal Information, and we will not be liable for any breach of security or unintended loss or disclosure of information due to the website being linked to the Internet.

You must ensure your username and password applicable to accessing our website are kept secret and secure. We cannot be held liable where you have not kept your username and password strictly confidential.

Will take reasonable steps and use secure methods to destroy or de-identify Personal Information that is no longer required the purpose for which was obtained for any purpose for which it may be used under this Policy in accordance with the Act.

If we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach as soon as reasonably practicable, but within 30 days after we become aware that the suspected breach has occurred. Where it is ascertained that data breach has actually occurred and if we determine that there is a reasonable possibility of serious harm being caused to individuals as a consequence of the breach will notify the Privacy Commissioner and take reasonable steps to notify the affected individuals as soon as reasonably practicable.

12. Accessing and Correction, Erasing and your other rights

In addition to your other rights set out elsewhere in this Policy, you may contact us at any time to access your Personal Information and to request:

- **Access** to your Personal Information;
- **Rectification or supplementation**, if you believe that any the Personal Information, we are holding about you is incorrect, outdated, or incomplete.
- **Erasure** (or deletion) of your Personal Information, either in full or in part.
- **Withdrawal of consent**, where our use of your Personal Information is based on your consent (as indicated at the time of collection).
- **More Information** about the Personal Information we hold about you and to request a copy of your Personal Information
- **Restriction** on our further use or disclosure of your Personal Information, for either some or all purposes.

If you wish to review the Personal Information we hold about you, please send your request to our privacy officer by email or mail using the contact details at the end of this Policy (see section 17). A fee may apply for such access.

If you wish to amend the Personal Information because it is inaccurate, out of date, incomplete, irrelevant or misleading, or if you wish your Personal Information to be deleted or restricted, please contact our privacy officer.

Before you exercise these rights, we will need to verify your identity (or the identity of the person making the request on your behalf). We will then process your request as soon as possible and in accordance with the Act. We will only ever withhold information, or fail to action a correction request, where necessary and legally permitted; in which case we will provide you with written notice, together with an explanation and inform you of any exceptions relied upon under the APPs.

13. Keeping your Personal Information Up to Date

We hold Personal Information in a number of ways, including in hard copy documents, electronic databases, email contact lists and in paper files held in drawers and cabinets. We take reasonable steps to:

- make sure your Personal Information we collect is accurate, up to date and complete and (in the case of use and disclosure) relevant;
- protect the Personal Information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify Personal Information that is no longer needed for any purpose that is permitted by the APPs.

If the Personal Information about you is inaccurate or out of date, such as your address, email address or phone number, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

14. Overseas Disclosure

All Personal Information collected by ABC will be stored securely within Australia. We do not transfer personal data for storage outside of Australia.

15. Changes to our Policy

From time to time, we may amend or update this Policy. The current version will be posted on our website, and a copy may be obtained by contacting our Privacy Officer (details below).

We encourage you to periodically review this Policy so that you remain informed as to how we are protecting your Personal Information.

16. Complaints

If you have any questions, concerns or would like to make a complaint about the use or disclosure of your Personal Information by us or would like copy of this Policy in an alternative format, please contact our privacy officer. We will promptly investigate any concerns or complaints and will respond to you as soon as practically possible, by email, setting out the outcome of our investigation and the steps we will take in response.

We will endeavour to resolve your complaint as soon as possible. However, the length of time will depend on the nature and complexity of the issues you have raised. We will always try to match our response, to the nature of your complaint and your desired outcome, but this may not always be possible.

Some of the things that we may decide to do include:

- Take steps to rectify the problem or issue you have raised;
- Provide you with additional information or advice so that you can understand what happened and how we have dealt with it;
- Take steps to change policies or procedures if your complaint identifies a problem in the way we are doing things;

It will not always be possible to resolve a complaint to everyone's satisfaction. In that case, you might want to escalate the matter to the Privacy Commissioner via an online privacy complaint form which can be found at:

<http://www.oaic.gov.au/privacy/privacy-complaints>

We welcome your questions and comments regarding this Policy.

17. Contact Details

Please contact us if you have any queries about Personal Information that we hold about you or the way we handle that Personal Information. Our contact details are set out below:
For privacy related inquiries or complaints, please contact:

Mail: Privacy Officer,
ABC Couriers and Transport Services Pty Limited
127-129 Beaconsfield Street,
Silverwater NSW 2128
Australia

Email: privacy@abc-couriers.com.au

Telephone: +61 2 9648 5444

Further general information about privacy is available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au or by calling the OAIC's enquiry line at 1300 363 992.

ABC Entities:

- **ABC Couriers & Transport Services Pty Limited** is an Australian company (ACN 074 480 676) with its principal place of business at 127-129 Beaconsfield Street, Silverwater NSW 2128, Australia.
- **ABC Logistic Services Pty Limited** is an Australian company (ACN 089 516 030) with its principal place of business at 127-129 Beaconsfield Street, Silverwater NSW 2128 Australia.