

# FOLEY LOGISTICS PTY LTD

## PRIVACY POLICY

ABN 84 678 819 504

### ○ INTRODUCTION

In the course of providing transport, logistics, crane-truck and freight services across Australia, Foley Logistics Pty Ltd collects, uses, stores, and manages personal information.

This Privacy Policy explains how we handle that information and ensures it is managed in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles (APPs)*.

Foley Logistics is committed to protecting the privacy of individuals whose personal information we obtain, including:

- Clients and customers
- Subcontractors and drivers
- Suppliers and service partners
- Prospective employees and subcontractors
- Website and digital platform users

This policy also sets out how we manage credit information in accordance with the Privacy Act 1988 (Cth) and relevant credit reporting provisions.

For the purposes of this policy, “personal information” refers to any information or opinion that identifies or could reasonably identify, an individual.

## ○ HOW WE MANAGE PERSONAL INFORMATION

Foley Logistics takes a structured approach to managing personal information and protecting privacy.

We do this by:

- Developing internal procedures for identifying, assessing and reducing privacy risks
- Using secure technology and access controls to prevent unauthorised use or disclosure
- Training employees on privacy obligations and safe information handling
- Ensuring subcontractors and contractors comply with the APPs
- Maintaining procedures for responding to privacy breaches or complaints
- Appointing a designated Privacy Officer to oversee compliance

Foley Logistics will take reasonable steps to destroy or de-identify information that is no longer required.

## ○ WHAT INFORMATION WE COLLECT & HOLD

The personal information we collect varies depending on whether the individual is a customer, subcontractor, employee, website user or job applicant.

### 3.1 Customers

We may collect:

- Contact details and communication history
- Payment details or credit-related information
- Business registration information
- Details required to provide transport or logistics services
- Identity verification information

### 3.2 Website Users

Our website automatically collects information such as:

- IP address
- Browser type
- Pages visited, access times, and referring sites

Our website may use cookies and analytics tools to improve user experience and monitor website performance. Users may disable cookies through their browser settings.

### **3.3 Subcontractors, Agents & Prospective Employees**

We may collect:

- Contact and identity details
- Licence details, driving history, qualifications, and accreditation status
- Employment history
- Insurance and claims details
- Banking and payment details
- Records from in-vehicle monitoring systems (e.g., GPS, fatigue data, dash cameras)
- Sensitive information, including:
  - Health and medical screening results
  - Drug and alcohol testing results
  - Criminal background checks
  - Union or professional association membership

Sensitive information is only collected with the individual's consent and where reasonably necessary for workplace safety, legal compliance, or contractual obligations, unless otherwise permitted by law.

#### ○ **HOW WE COLLECT PERSONAL INFORMATION**

We typically collect information directly from the individual; however, we may also obtain information from:

- Subcontractors or employment agencies
- Previous employers
- Medical professionals conducting health assessments
- Drug and alcohol testing providers
- Trade references or referees
- Insurance brokers or underwriters
- In-vehicle telematics systems

## ○ HOW WE STORE & PROTECT PERSONAL INFORMATION

Foley Logistics stores information securely:

- Physically in restricted areas
- Digitally on secure servers
- Within protected cloud-based platforms

Security controls include:

- Access restrictions and authentication (passwords, role-based access)
- Encrypted digital systems
- Monitoring of data access
- Secure document storage for sensitive records

### NOTIFIABLE DTA BREACHES

If Foley Logistics experiences an eligible data breach under the Privacy Act 1988 (Cth), we will:

- Assess the suspected breach promptly
- Take immediate steps to contain and mitigate the breach
- Notify affected individuals where required
- Notify the Office of the Australian Information Commissioner (OAIC) where required

## ○ WHY WE COLLECT, HOLD, USE & DISCLOSE INFORMATION

### 6.1 Primary Purposes

We collect information to:

- Provide transport, logistics, crane-truck and freight services
- Manage subcontractor engagement
- Ensure workplace safety and operational compliance
- Assess applicants and subcontractors for onboarding
- Maintain accurate communication and billing records

### 6.2 Secondary Purposes

We may also use information:

- To assess creditworthiness for approved customers
- To maintain service quality and support relationship management
- For internal reporting, training, and quality assurance

We do not sell or rent personal information.

### **6.3 Disclosure of Information**

We may disclose personal information to:

- Subcontractors and contractors
- Medical professionals (e.g., for screening or drug testing)
- Government agencies and regulators
- Insurers and brokers
- Technology service providers
- Customers who require driver or compliance information for legislative or contractual purposes

Some personal information may be stored or processed by cloud-based service providers located outside Australia, including but not limited to the United States or other jurisdictions. Where this occurs, Foley Logistics takes reasonable steps to ensure those providers comply with privacy obligations consistent with Australian law.

## **CREDIT INFORMATION MANAGEMENT**

While Foley Logistics does not generally collect credit information from subcontractors or employees, we may collect credit-related details from customers, including:

- Identification information
- Credit terms and repayment history
- Records of overdue payments
- Court actions, insolvency, or publicly available credit information

Sources may include:

- Banks and credit providers
- ASIC records
- Trade referees
- Debt collection agencies

## ○ ACCESS, CORRECTION & COMPLAINTS

### **8.1 Access to Personal Information**

Individuals may request access to information we hold about them. Access may be refused in circumstances permitted under the Privacy Act 1988 (Cth).

### **8.2 Correction of Information**

If information is incorrect or outdated, we will take reasonable steps to correct it promptly.

### **8.3 Complaints**

Privacy complaints must first be submitted to Foley Logistics in writing.

We will:

- Acknowledge the complaint
- Investigate promptly
- Provide a written response

If unresolved, individuals may escalate the complaint to the Office of the Australian Information Commissioner (OAIC).



## ○ PRIVACY CONTACT DETAILS

Privacy Officer: **Foley Logistics PTY LTD Director**  
Postal Address: **PO Box 288, Sanctuary Cove QLD 4212**  
Email: **admin@foleylogistics.com.au**  
Phone: **1300 412 720**

## ○ CHANGES TO THIS POLICY

Foley Logistics may update this policy at any time. Updated versions will be published on our website.

## ○ DOCUMENT CONTROL

**Document Code: PP-FL**

**Review Frequency: 12 Months**

**Approved By: Director – Foley Logistics**

**Next Review Date: May 2025**

Signed for and on behalf of Foley Logistics Pty Ltd

A handwritten signature in black ink, appearing to be 'A. B.', written over a horizontal line.

Director Signature

**Official controlled copy is the electronic version.**  
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