

1 INTRODUCTION

- 1.1 WSI Logistics Pty Ltd (A.C.N.609 966 654) (WSI) recognises that the privacy of personal information is important and is committed to protecting personal information that it collects and holds. *The Privacy Act 1988* (Cth) (the Privacy Act) and the Australian Privacy Principles set out the applicable legal requirements with respect to the management of personal information, with the exception of certain employee records.
- 1.2 This policy sets out how WSI collects, uses, discloses and otherwise manages personal information. 'Personal information' is information or opinions relating to an identifiable individual. Information is not personal information where it cannot be linked to an identified individual.
- 1.3 Nothing in this policy prevents WSI from collecting or disclosing personal information that comprises employee records of current or former employees, provided such collection or disclosure does not breach the Privacy Act.
- 1.4 The policy is effective from 1st January 2023.

2 TYPES OF PERSONAL INFORMATION WSI COLLECTS

- 2.1 The types of personal information that WSI may collect and hold in relation to subcontractors, employees and prospective subcontractors and employees includes:
- (a) contact information including date of birth, ID documents and emergency contact information;
 - (b) recruitment information including application form/s, interview documentation, reference checks or screening information;
 - (c) employment history including any promotions or demotions, performance reviews and disciplinary records;
 - (d) medical information including medical testing, details of leave of absences or workplace accidents or injuries;
 - (e) GPS data from Navman GPS tracking;
 - (f) video footage from cameras in WSI's depot;
 - (g) financial information;
 - (h) licensing information; and
 - (i) information that WSI is legally required to collect (including identification documents as described in clause 2.3).
- 2.2 The types of personal information that WSI may collect and hold in relation to customers and suppliers (other than subcontractors) includes:
- (a) contact information;
 - (b) recruitment information including application form/s, interview documentation, reference checks or screening information;
 - (c) video footage from cameras in WSI's depot;

- (d) billing and financial information;
 - (e) licensing information;
 - (f) details of any enquiries or complaints;
 - (g) information that WSI is legally required to collect; and
 - (h) in the case of customers, credit information, the management of which is explained in clause 3.
- 2.3 WSI's depot is a licensed depot under the *Customs Act 1901* (Cth) (Customs Act). This means visitors must produce photographic ID with a residential address. An Australian drivers licence or (for overseas visitors only) a passport are acceptable forms of ID. WSI uses electronic ID scanners in its gate house for all visitors entering its facility to scan their ID. The scanners will collect information such as name, address, and date of birth. This data is stored on secure WSI servers.
- 2.4 'Sensitive information' is a special category of personal information and includes information that could have serious consequences for the individual if it is used inappropriately. WSI may, with the consent of the individual, collect sensitive information about subcontractors and employees and prospective subcontractors and employees including:
- (a) medical history;
 - (b) drug and alcohol test results;
 - (c) criminal history; and
 - (d) membership of unions and professional associations.
- 2.5 WSI will not collect sensitive information without the consent of the individual to whom the information relates unless it is permitted to do so under the Privacy Act.

3 WHAT TYPES OF CREDIT INFORMATION DOES WSI COLLECT?

- 3.1 In providing services to a customer, WSI may collect and hold the following types of credit information:
- (a) information about any credit that has been provided;
 - (b) repayment history information and information about overdue payments; and
 - (c) information in relation to court proceedings that are initiated in relation to customer credit activities and any relevant bankruptcy or insolvency arrangements.
- 3.2 Sources from which WSI may collect credit information include:
- (a) ASIC;
 - (b) banks;
 - (c) suppliers; and
 - (d) WSI's subcontractors and agents.
- 3.3 WSI may also collect personal information which may affect a customer's creditworthiness from other credit providers, such as trade referees, who may collect that information from credit reporting bodies. The types of personal information WSI collects may include any of those types of personal information outlined in clause 3.1 of this policy.

4 PURPOSE OF COLLECTING INFORMATION

- 4.1 WSI collects the personal information of subcontractors and employees and prospective subcontractors and employees to allow it to:
- (a) manage any employment or engagement relationship, including to assess performance, and for health and safety purposes;
 - (b) comply with legislative requirements; and
 - (c) determine whether to offer employment to a prospective employee.
- 4.2 WSI collects personal information from closed-circuit television cameras:
- (a) to prevent and detect crime;
 - (b) to assist in providing a safe working environment;
 - (c) to protect WSI's property and the property of WSI's customers, subcontractors, agents and visitors; and
 - (d) for quality and compliance purposes.
- 4.3 WSI collects the personal information of customers and potential customers to allow it to:
- (a) provide transport and warehousing services;
 - (b) comply with legislative requirements; and
 - (c) provide information about any additional services WSI offers.
- 4.4 WSI also collects the personal information of staff and visitors at its depot in order to comply with the Customs Act.

5 WHAT HAPPENS IF PERSONAL INFORMATION IS NOT PROVIDED?

If a person fails to provide WSI with personal information that WSI seeks, or if that information is inaccurate or incomplete, WSI may be unable to provide that person with transport or warehousing services or to consider engaging or employing that person. WSI may be unable to permit access to its depot.

6 HOW DOES WSI COLLECT PERSONAL INFORMATION?

- 6.1 WSI usually collects personal information directly from the person to whom the information relates.
- 6.2 WSI may also collect personal information from:
- (a) government bodies and agencies;
 - (b) public records and registers;
 - (c) courts and tribunals;
 - (d) current and previous employers;
 - (e) recruitment agencies and labour hire providers;
 - (f) doctors or other medical professionals who carry out health screening checks;

- (g) closed-circuit television cameras;
- (h) Navman GPS trackers;
- (i) document scanning equipment; and
- (j) online searches and social media.

7 HOW DOES WSI USE AND DISCLOSE PERSONAL INFORMATION?

7.1 Personal information may be disclosed to:

- (a) WSI's subcontractors;
- (b) entities that conduct licence checks for WSI;
- (c) government bodies such as Australian Border Force, Australian Federal Police, WHS authorities, the Department of Home Affairs, the Department of Human Services, the National Heavy Vehicle Regulator, State and Territory road authorities, and the Australian Taxation Office;
- (d) customers who require information from WSI for their compliance procedures or to meet legislative requirements;
- (e) third party service providers engaged by WSI to provide services such as insurers, IT support providers and banks;
- (f) entities that provide medical testing and drug and alcohol testing for WSI; and
- (g) third party technology providers including Navman.

8 HOW DOES WSI PROTECT PERSONAL INFORMATION?

8.1 WSI uses various physical and electronic security measures to protect personal information held by WSI, including using:

- (a) security systems and other restrictions to limit access to WSI's premises;
- (b) locked filing cabinets;
- (c) secure electronic databases;
- (d) unique usernames, passwords and other protections on systems that can access personal information; and
- (e) electronic security systems and firewalls.

8.2 WSI also manages the personal information it collects by:

- (a) providing its staff with training on their obligations under the Privacy Act;
- (b) supervising staff who regularly handle personal information;
- (c) implementing procedures to identify and report privacy breaches and to respond to complaints about privacy breaches; and
- (d) designating a privacy officer whose role is to manage compliance with the Privacy Act.

9 OVERSEAS DISCLOSURE

WSI does not generally disclose personal information to overseas recipients. WSI's software providers may store or back up data overseas. Some data may be sent overseas to the Philippines for cargo management software data entry.

10 ACCESSING AND CORRECTING PERSONAL INFORMATION

10.1 Any person may request access to personal information about them held by WSI or request that their personal information is corrected.

10.2 Requests may be made to WSI's Privacy Officer Michael Hamilton by emailing michael.hamilton@wsilogistics.com.au or calling 02 8319 2855 or writing to:

'The Privacy Officer, Michael Hamilton, WSI Logistics Pty Ltd, 36 Gow St, Padstow NSW 2211'.

10.3 If a request is made in accordance with clause 10.1, WSI will take reasonable steps to:

- (a) provide access to relevant personal information that it holds; and
- (b) correct any personal information if the data or information held is incomplete, irrelevant or misleading.

10.4 WSI will not disclose any personal information under clause 10.3 without proof of identity.

10.5 WSI 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.

11 COMPLAINTS

11.1 Complaints about a breach of the Australian Privacy Principles may be made to WSI's privacy Officer by emailing michael.hamilton@wsilogistics.com.au or calling 02 8319 2855 or writing to

'The Privacy Officer, Michael Hamilton, WSI Logistics Pty Ltd, 36 Gow St, Padstow NSW 2211'.

11.2 All complaints will be responded to within a reasonable time.

11.3 Complaints may also be referred to the office of the Australian Information Commissioner (see details at <http://www.oaic.gov.au>).

12 CHANGES TO THE POLICY

WSI may update or modify this policy at any time.