

DNR Logistics Privacy Policy

1. Introduction

- 1.1. This software application, the products or services sold on, or via, this software application (collectively, the **DNR APP**) are created, operated and controlled by DNR Logistics Pty Ltd (ACN 102 989 426) (**DNR, we, us or our**).
- 1.2. We are committed to ensuring your personal information is protected. We manage your personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (**Privacy Act**).
- 1.3. By accessing and using and continuing to use the DNR APP you agree to this Privacy Policy.
- 1.4. This Privacy Policy outlines how we collect, store, use and disclose your Personal Information, and how you may access your Personal Information (as defined in the Privacy Act) kept by us or how you may make a privacy complaint.

2. The information we collect about you

- 2.1. DNR will only collect and hold Personal Information about you that is reasonably necessary to undertake our business activities and functions, deliver our products, services and the DNR APP to you, or as otherwise permitted by law.
- 2.2. The type of Personal Information that we collect and use depends on the type of dealings that you have with us and includes the following:
 - (a) customer details (for example, full name, business name, business address, mobile and office number, email address and government identifiers, such as ACN and ABN details);
 - (b) driver details (for example, driver's licence number, truck registration details, identification information, date of birth, and driver photograph, login name and password, insurance policy details and insurance claim details and non-sensitive information or opinions about a driver's fitness to work);
 - (c) transaction and proof of delivery details (for example, details of the goods consigned, drop-off or collection recipient details (such as name and digital signatures));
 - (d) location information of drivers when the DNR APP is in use (for example, date and time services were provided, date and time of use, location and route and distance traveled);
 - (e) information relating to your dealings, or enquiries you have made, with us (including information about the products or services provided in connection with the DNR APP) and communications between drivers, customers and DNR in relation to our products, services and the DNR APP;
 - (f) payment and billing information;

- (g) information regarding your access and use of our website, including location information, IP address and any third party websites you access;
- (h) other information that you provide to us or that we may collect in the course of our relationship with you; and
- (i) information provided by or on behalf of driver applicants or employment.

2.3. We do not collect your Sensitive Information (as defined by the Privacy Act). However, some of our services are automated and we may not recognise that you have accidentally provided us with Sensitive Information. If you have accidentally sent us Sensitive Information, please contact us using the contact details set out in section 12 below.

3. How we collect Personal Information

3.1. We will collect Personal Information about you in a number of different ways. We may collect Personal Information directly from you or in the course of our dealings with you. For example, when you:

- (a) when a driver downloads, accesses and uses the DNR APP (including when a driver creates or updates their profile on, or, via, the DNR APP);
- (b) when a customer opens a customer account with DNR or applies for credit with us or when the customer uses or orders our products or services;
- (c) when a customer contacts and corresponds with us (for example, when you complete online forms for our products or services or subscribe to our publications, alerts and newsletters, or information you provide to us when you send us an email);
- (d) visit our website (including via cookies), contact us online or via telephone with a query or request, or make a comment on our social media sites;
- (e) provide your Personal Information to third parties (including to our related bodies corporate, business partners and service providers (including drivers), credit reporting bodies, credit providers, government agencies, public registries, search agencies, regulatory and licensing bodies, parties to whom you refer us (for example, previous employers and referees), recruitment agencies and from publicly available sources of information (for example, online databases and social media));
- (f) when apply for a position of employment with us; or
- (g) when otherwise legally authorised or required to do so.

3.2. When we collect Personal Information directly from you, we will take reasonable steps to notify you (using a collection notice) at, before, or as soon as practicable after, the time of collection. As a collection notice is specific to a particular collection of Personal Information, it will provide more specific information about our information-handling practices than this Privacy Policy.

4. How we use your Personal Information

We use and disclose your Personal Information for the purposes for which the information is collected, including (but not limited to):

- (a) providing drivers with access to, and use of, the DNR APP, and to correspond with a drivers when goods are in transit to ensure effective delivery of consigned goods;
- (b) screening drivers for suitability as third party providers and ensuring that they are fit to perform transport or consignment work;
- (c) enabling delivery and consignments to be tracked and closely monitored by us;
- (d) delivering our products or services to customers and assisting with, or responding to, customer queries;
- (e) informing driver and/or customers about the DNR APP, our products or services, offers, promotions or other matters which we believe are of interest to you (such as recruitment or job opportunities);
- (f) share with our Third Party Providers;
- (g) administering, improving and managing our products, services, the DNR APP (including customising the content on our website and/or the DNR APP) and our relationship with you;
- (h) charge and bill customers for the use of our products and services;
- (i) verifying your identity;
- (j) for internal record keeping;
- (k) for direct marketing purposes (see section 6 below); and
- (l) complying with our legal and regulatory obligations.

5. Disclosure to Third Party Providers

5.1. In order to provide or deliver the DNR App, our products or services to you, DNR may disclose your Personal Information to:

- (a) our related bodies corporate, business partners, service providers, third party contractors, drivers, agents or suppliers;
 - (b) authorised external service providers who perform functions on our behalf, such as financial and credit card institutions in order to process any payments, internet and technology services providers, web developers, hosting companies, credit reporting agents and debt collection agents;
 - (c) external business advisors, such as auditors, lawyers, insurers and financiers,
- (collectively, **Third Party Providers**).

5.2. We may also disclose your Personal Information to:

- (a) to any other party with your consent and direction; and
- (b) law enforcement bodies or regulatory authorities to assist with their functions, or as otherwise required or authorised by law.

5.3. Prior to the disclosure of Personal Information to Third Party Providers, we will take such steps as are reasonable in the circumstances to ensure that the Third Party Providers treat your Personal Information securely and otherwise complies with the relevant Australian Privacy Principles in relation to the Personal Information.

6. Marketing communications

6.1. We may use and disclose your Personal Information to send you information about the products or services we offer, as well as other information that may be of interest to you. We may send this information in a variety of ways, such as by mail, email, SMS, telephone, social media or by customising online content and displaying advertising on our website.

6.2. If you do not wish to receive any of these marketing communications, you can opt out by following the unsubscribe instructions included in the relevant marketing communication, or by contacting us using the contact details set out in section 12 below.

7. Overseas disclosures of Personal Information

7.1. In the course of providing you with our products or services, it may become necessary or desirable to disclose Personal Information to Third Party Providers located overseas. The countries in which these overseas recipients may be located will depend upon the individual circumstances. However, in the course of our ordinary business operations we commonly disclose Personal Information to Third Party Providers located in the following countries: United State and Singapore.

7.2. The laws where these overseas recipients may be located provide various levels of protection for Personal Information which are not always equivalent to the level of protection that may be provided for in Australia. Where we transfer your Personal Information overseas we will take reasonable steps to ensure that your Personal Information is treated securely and the means of transfer provides adequate safeguards.

7.3. If you have any questions in relation to the transfer of your Personal Information please contact us using the contact details set out in section 12 below.

8. Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of your Personal Information that is likely to result in serious harm to you, we will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with notifiable data breach scheme contained in Part IIIC of the Privacy Act.

9. Security of your Personal Information

9.1. We will take steps that are reasonable in the circumstances to ensure that the Personal Information that we hold are protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold Personal Information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

- 9.2. We protect your information using physical, technological and administrative security measures to minimise and manage the risks of unauthorised access, disclosure, use and alteration of your Personal Information. Some of the safeguards that we use include HTTPS/SSL certificates with RSA SHA256 signature algorithms, which are TLS 1.2 compatible. Accessing the critical services requires an authentication process during which an authentication token is generated. The token is signed using HMAC-SHA256 algorithm and it expires periodically. Additionally, the critical services are protected using an industrial strength firewall and proxy server. These are configured to expose only the necessary server access points and are designed to protect the system against malicious bots and hacking attempts.
- 9.3. The transmission of information via the Internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services and any transmission is at your own risk.
- 9.4. We will destroy or de-identify Personal Information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

10. Accessing and correcting your Personal Information

- 10.1. We take steps reasonable in the circumstances to ensure Personal Information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your Personal Information that is collected and held by us.
- 10.2. If at any time you would like to access or correct the Personal Information we hold about you, or you would like more information about our approach to privacy, please contact us via the contact details set out in section 12 below. We will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct Personal Information where necessary and appropriate.
- 10.3. To obtain access to your Personal Information:
 - (a) you will have to provide proof of identity to ensure that Personal Information is provided only to the correct individuals and that the privacy of others is protected; and
 - (b) we may charge you a reasonable administration fee, which reflects our costs in providing you with access to your Personal Information in accordance with your request.
- 10.4. If we refuse your request to access or correct your Personal Information, we will provide you with written reasons for the refusal and details of complaint mechanisms.

11. Cookies

- 11.1. We use small text files placed on your computer called 'cookies' to collect standard log and visitor behaviour information in an anonymous form. We use this information to analyse how visitors use our website and to compile statistical reports on website activity. You can set your computer to reject cookies, but this may affect your ability to use certain parts of our website.

11.2. We may also log your IP address. Your IP address is your computer's electronic Internet address. We may collect your IP address to see trends, run the website, track user movements, and gather broad demographic information.

12. Privacy complaints

12.1. If you have any complaints or issues you wish to raise with us regarding the way we have handled your Personal Information, or would like to discuss any issues about our Privacy Policy, please contact us directly by email enquiries@dnrlogistics.com.au or by calling us on (03) 8581 1000. Please provide us with full details of your complaint and any supporting documentation.

12.2. We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in resolving your complaint. At all times, we will treat your privacy complaint seriously and in a confidential manner.

12.3. If you are unhappy with a response that you have received from us, you may direct your complaint to the Office of the Australian Information Commissioner.

13. Changes to this Privacy Policy

From time to time it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on our website. We encourage you to check our website from time to time to ensure you are familiar with our latest Privacy Policy.