

## Overview

The Toll Way is the underpinning foundation of our core beliefs and values which guides our decisions and actions. This policy sets out Toll's position on Privacy.

Toll Holdings Limited and the Toll group of companies ("Toll") respects the privacy of every individual and is committed to protecting the personal data it collects in accordance with the principles set out in this Policy.

## Scope

In accordance with the privacy laws of the countries in which Toll operates, this Privacy Policy ("Policy") outlines how Toll manages the collection, use, disclosure and handling of, or otherwise processes the personal data of its customers, the personnel of customers, receivers of cargo consigned to us or our services, visitors to Toll's websites or premises, Toll's employees and contractors, a contact at one of Toll's suppliers or other business partners, and others with whom Toll deals with ("you") in accordance with these legal requirements.

Unless otherwise stated, Toll Holdings Limited is the data controller for personal data we collect from you or you provide to us.

The related Documents referred to at the end of this Policy also contain important information, and employees and contractors should also consider in particular the Privacy Notice for Personnel, and applicants for positions should consider in particular the Privacy Notice Recruitment.

## Principles

### Personal Data

In this Policy, "personal data" means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person's physical, physiological, mental, economic, cultural or social identity or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion. Personal data includes "sensitive personal data" (which means information or an opinion about an individual's racial or ethnic origin, political opinion, membership of a political association or trade union, religious or philosophical beliefs, sexual life, sexual orientation, health, political or union related views or activities and the commission or alleged commission of offences and related proceedings including administrative or criminal sanctions).

### Personal Data Collection

To enable us to fulfil our responsibilities as an integrated provider of forwarding, logistics, transport, warehousing and related services and, in the case of our Toll People and Toll Transitions businesses, our responsibilities as a supplier of recruiting and relocation services, Toll collects personal data about you, to enable Toll to effectively conduct its businesses. This personal data must be sufficiently detailed for Toll to effectively conduct its businesses.

You are not required to supply any of the personal data that we may request. However, if the personal data we request is not provided, we may not be able to provide services in the most effective or efficient manner, or at all, or you may not be able to be a service provider to Toll.

We only collect personal data for our business purposes, as set out at "**Use and Disclosure of Personal Data**" below and in accordance with any applicable privacy / data protection laws.

Effective: 25 May 2018

Policy Owner: Chief Legal Officer

N.B. This policy does not form part of your employment contract and Toll may vary, revoke or replace this policy from time to time.



Our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances we may also be required by law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself, if provision of the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary. Otherwise you should assume that we need the information for our business or compliance purposes (as described below).

Depending on the business purpose, the personal data we collect may include:

- when you as a customer or the personnel of customers, or are a recipient or sender of goods transported by us or services provided by us, create an account or use or receive the benefit of our services, we, or our service providers acting on our behalf, may collect the following types of information: your name, date of birth, driver number ID, personal ID, address, phone, email, full bank account details and/or credit card numbers that you link to your account or input when you use our services. We will use this information to fulfil your requests and provide the relevant services;
- we may require you to provide additional information which we may use in collaboration with service providers acting on our behalf to verify your identity or address, and to manage our exposure to risk. This information may include your date of birth, taxpayer or government identification number, a copy of your government-issued identification, a photo of you, or other personal information. We may also obtain information about you from third parties such as credit bureaus and identity verification services;
- whenever you contact us or respond to our communications (e.g., email, telephone, correspond in writing), we receive your contact information and any other personal information you choose to provide us. We will use such information to fulfil your requests or if you are our customer or the personnel of customers, or the recipient or sender of goods transported by us or services provided by us, to provide services;
- you may choose to provide us with access to certain personal information stored by third parties such as social media sites (such as Facebook and Twitter). The information we have access to varies by site and is controlled by your privacy settings on that site and your authorization;
- we collect personal information when you as a customer or the personnel of customers, or a recipient or sender of goods transported by us or services provided by us, use or request information about our services, subscribe to marketing communications, request support, complete surveys, or sign up for an event or webinar;
- we also collect personal information from you offline as a customer or the personnel of customers, or a recipient or sender of goods transported by us or services provided by us, such as when you attend one of our events, when you contact customer support, or when you give us a business card (or similar) . We may use this information in combination with other information we collect about you.
- information relating to your business relationship with Toll, including previous services provided by Toll to you (as a customer or the personnel of customers, or a recipient or sender of goods transported by us or services provided by us) or provided by you to Toll (in any other case);
- information about your professional role, background and interests;
- financial information;
- if we have a business relationship with the organisation that you represent, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the relationship;
- if we deliver a service to your organisation (such as a relocation service through Toll's specialist relocations business, Toll Transitions), we may collect personal data from the organisation purchasing the service (for example, in the case of relocation services, your destination address);
- from third party data providers or publicly available sources for anti-money-laundering, background checking and similar purposes, and to protect our business and comply with our legal and regulatory obligations;
- if you exchange emails, telephone conversations or other electronic communications with our employees and other staff members, our information technology systems will record details of those conversations, sometimes including their content; or
- some of our premises have closed circuit TV systems or other monitoring devices which may record you if you visit our premises, for security and safety purposes.

We generally collect personal data directly from you in person, in writing, by telephone, email or via our websites, or by giving us a business card (or similar).

We will only collect personal data to the extent that it is required for the specific purposes set out in this policy or notified to you at the time of collection.

Effective: 25 May 2018

Policy Owner: Chief Legal Officer

N.B. This policy does not form part of your employment contract and Toll may vary, revoke or replace this policy from time to time.

## Collection of Information via our Websites

When you visit one of our websites, information about your computer or web device is automatically recorded by our website. This includes your IP address and associated domain name (e.g. yourcompany.com), the date and time of your visit to our site, the pages you accessed or downloaded, the address of the last site you visited, your operating system and the type of browser you used. This information may be collected by us or by a third party service provider on our behalf. This information is collected for statistical and system administration purposes, and to improve our web based services. It does not readily identify individuals, and we will not attempt to identify individuals from the records our server generates unless it is necessary to do so for law enforcement purposes.

We may also use “cookies” to assign your device a user ID. Please refer to our separate Cookie Standard. A cookie is a small piece of information that is sent to your browser and stored on your computer's hard drive. Cookies contain information that allows us to identify your device, understand your use of our websites and set your preferences for future visits. We may use this information to determine whether or not to display standard content. You can configure your browser to notify you when you receive a cookie, or disable cookies altogether. Please refer to our separate Cookie Standard for further information about use of these cookies and how to enable them and disable them. These cookies expire when your browser window is closed.

Please note that some of the cookies we use are essential for our websites to operate, and that if you disable cookies altogether you will not be able to use all parts of our website.

## Use and Disclosure of Personal Data

Your data will be processed fairly, lawfully and in an appropriate way.

We will only use personal data for the purpose for which it was collected or for related purposes permitted by law. These uses include (but are not limited to) those set out below.

**Information you give to us.** We may use this information for the following purposes:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- as Toll's customer or the personnel of customers, or a recipient or sender of goods transported by us or services provided by us:
  - to provide you with support in relation to the products and services that you request from us;
  - to process transactions and send notices to you about your transactions;
  - to send administrative or account-related information to you;
  - to resolve disputes, collect fees and troubleshoot problems;
  - to deliver targeted marketing, service update notices, and promotional offers based on your communication preferences (where this in accordance with the law);
  - to the extent permitted by applicable law, permit selected third parties to provide you, with information about goods and services we feel may interest you
- to operate, manage, develop and promote our business and, in particular, our relationship with the organisation you represent (if any) and related transactions;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to facilitate distribution of corporate communications such as our financial results and other information that is relevant to the promotion or reporting of our business activities;
- to protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial materials and other financial or business crimes; and
- to comply with our legal and regulatory obligations and bring and defend legal claims

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**Information we collect about you.** We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- as Toll's customer or the personnel of customers, or a recipient or sender of goods transported by us or services provided by us:
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
  - to the extent permitted by applicable law, to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

**Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Toll uses personal data to provide, manage and administer the goods and services it provides. In the normal course of our business operations we may disclose personal data to related bodies corporate and statutory entities authorised to access the information.

We may from time to time review information about you held in our systems – including the contents of and other information related to your email and other communications with us – for compliance and business-protection purposes as described above. This may include reviews for the purposes of disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law these reviews will be conducted in a reasonable and proportionate way and approved at an appropriate level of management. They may ultimately involve disclosure of your information to governmental agencies and litigation counterparties as described below.

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.
- Your colleagues within the organisation that you represent (in terms of your contact details and your role).
- Selected third parties including:
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - contract service providers, including but not limited to customer service staff, consultants, advisers, IT and internet service providers;
  - analytics and search engine providers that assist us in the improvement and optimisation of our site;
  - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
  - potential employers (in the case of our Toll People business); and
  - another entity in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal data you have provided to us in a manner that is consistent with the principles described in this Policy.
- In exceptional circumstances:
  - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
  - where we are required by law to disclose.

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## **Access, Correction and Retention**

We try to ensure that personal data we hold is adequate, relevant, accurate, complete and up to date. You can contact the data compliance lead (see below) if you would like details of personal data which may be held about you. You have the right to access the personal data we hold about you, and to some related information, under data protection law. You can also require any inaccurate personal information to be updated, corrected or deleted. In certain limited circumstances, you have the right to receive some of the personal information that you have provided to us in a structured, commonly used and machine-readable format and to transmit that information to another service provider. You can object to our use of your personal information for direct marketing purposes.

To ensure the integrity and safety of personal data, Toll only discloses the personal data it holds to the individual concerned, their legally authorised representative, or to fulfil legal or regulatory requirements. In some circumstances we may charge a fee only in accordance with applicable law, and in any case not where the processing of your personal data is regulated by the General Data Protection Regulation ("GDPR"). To ascertain what fee we may charge, please contact the data compliance lead (see below).

You can lodge a complaint about our processing of your personal information with the relevant data protection authority in the jurisdiction where you are located.

We will keep personal data for as long as is necessary in accordance with our records management policies for the purpose or purposes for which they were collected. We will take all reasonable steps to delete from our systems, all data which is no longer required. Toll will delete any personal data we hold about you when it is no longer required and we are legally able to do so.

Note that we may retain some limited information about you even when we know that you have left the organisation that you represent, so that we can maintain a continuous relationship with you if and when we are in contact with you again, representing a different organisation.

## **Storage and Security of Personal Data**

Personal data is principally held in electronic databases maintained within Toll's computer network. Toll maintains appropriate administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Please see further below.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential.

We ask you not to share a password with anyone. Your personal data will be processed in accordance with our data security policies. We will maintain data security by protecting the confidentiality, integrity and availability of the personal data we hold.



## **Transfer of Personal Data Outside the Country in which it was Collected**

We may, as part of the disclosures set out at "**Use and Disclosure of Personal Data**" above, transfer your personal information outside the country in which the personal data was collected. Pursuant to and in accordance with any applicable privacy / data protection laws (including, without limitation, the GDPR and any national laws implementing the GDPR), your personal data may be disclosed, processed and transferred by Toll on a worldwide basis for the purposes of providing our services. Personal data may be disclosed or transferred to agents or third parties authorised to act on our behalf for the purposes of providing the services.

Some countries may not provide the same level of protection for your personal information as the country in which your personal data was collected. Please note, however, that Toll maintains appropriate administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use and where required, Toll will enter into data transfer agreements (as applicable on terms approved for this purpose by the European Commission) with the recipients of the personal data to ensure that the recipient abides by Toll's obligations under any applicable privacy / data protection laws.

## **Use of our Websites**

Our website may contain links to other websites that are not owned, operated or endorsed by us. We are not responsible for the privacy practices of those websites, or for the content, product or services provided by, or contained on, those websites.

## **Breaches of this Policy**

All suspected breaches will be investigated and appropriate disciplinary and remedial action taken. Employees who do not strictly comply with this Policy will face disciplinary action, including counselling, formal warnings and dismissal.

## **Further Information**

We may amend this Policy from time to time. Updated versions of this Policy will be placed on our website (<http://www.tollgroup.com>). As the Policy may be amended from time to time, you should review it regularly.

If you would like to gain access to your personal data, or if you wish to voice your concern on any matter to do with either this policy or use of your personal data, please contact the data compliance lead listed below:

Data Compliance Lead  
Toll Holdings Limited  
Level 7, 380 St Kilda Road  
Melbourne VIC 3004  
Australia  
Email: [privacy@tollgroup.com](mailto:privacy@tollgroup.com)

## Related Documents

Cookie Standard  
Data Protection Standard  
Data Retention Standard  
Privacy Notice for Personnel  
Privacy Notice Recruitment  
Data Protection By Design Guidance  
Data Subject Access Request Guidance