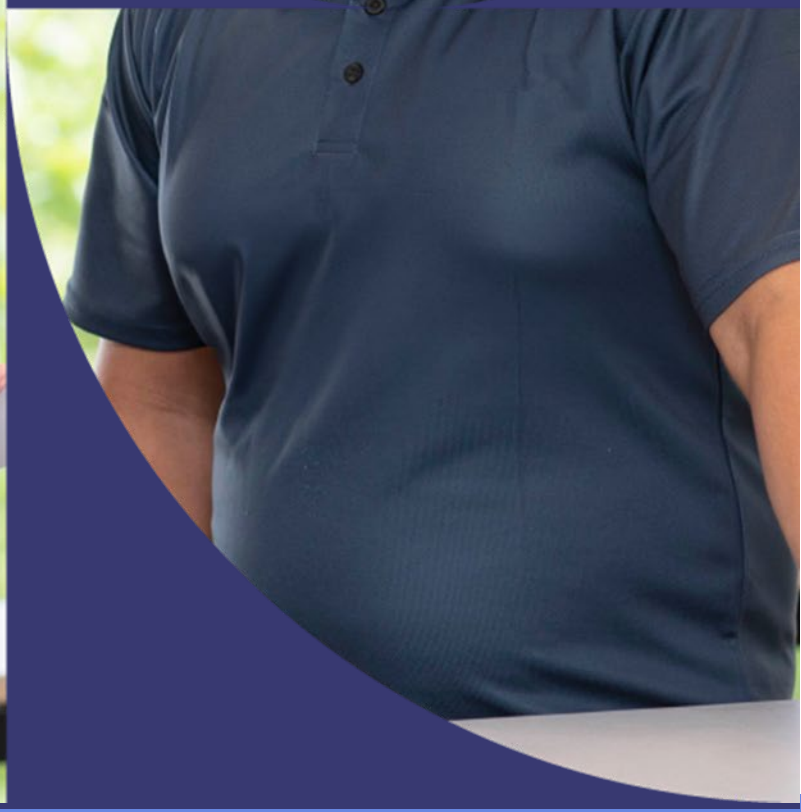

GCW – Group of Companies Privacy Policy

GCW

Privacy Policy

Introduction

GCW Holdings Pty Ltd entire group of companies (GCW) is committed to providing quality services to you and our customers, this policy outlines our ongoing obligations in respect of how we manage personal information.

GCW has adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of personal information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at https://www.oaic.gov.au/.

What is personal information and why do we collect it?

Personal information is information or an opinion that identifies an individual. Examples of personal information we collect includes names, addresses, email addresses, phone and identification documents e.g. passports licences etc.

This personal information is obtained in many ways including interviews, correspondence, by telephone and email, via our website, from media and publications, from other publicly available sources and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your personal information for the primary purpose of providing any of our services and providing information to our clients and marketing. We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

When we collect personal information, we will, where appropriate and where possible, explain why we are collecting the information and how we plan to use it.

Sensitive information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With the individual's consent, or where required or authorised by law.

Third parties

Where reasonable and practicable to do so, we will collect personal information only from the individual. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that they are made aware of the information provided to us by the third party.

Disclosure of personal information

Your personal information may be disclosed in a few circumstances including the following:

- **Third parties where you consent to the use or disclosure; and**
- **Where required or authorised by law.**

Security of personal information

Your personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When you're or the clients personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify personal Information as per the GCW - Data Protection Policy or as required or authorised by law.

Access to your personal information

You may access the personal information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your personal Information, please contact the Group Compliance and Risk Manager in writing. To protect your personal information, we may require identification from you before releasing the requested information.

Maintaining the quality of your personal information

It is important to us that your personal information is up to date. We will take reasonable steps to make sure it is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy updates

This Policy may change from time to time and is available on our website.

Privacy policy complaints and enquiries

If you have any queries or complaints about our privacy policy, please contact the Group Compliance and Risk Manager.

This includes:

- the kinds of Personal Information that we collect and hold about you.
- how we collect and hold your personal information.
- the purposes for collecting, holding, using and disclosing your personal information.
- how you may access your personal information held by us and correct that information where it is incorrect.
- how you may make a complaint about the way we collect, hold, use or disclose personal information, and how we will deal with privacy related complaints; and
- whether we will (or are likely to) disclose your personal information to overseas recipients and the countries where such recipients may be located.

You can choose to interact with us anonymously or by using a pseudonym if such interaction is general in nature. However, if the interaction is specific to an account or relates to your personal information, we will need to identify you before we can engage in further discussions and correspondence.

We will keep this privacy policy up to date and published on our website.

Scope

In accordance with the legal requirements and privacy laws of the countries in which GCW group of companies operates, this policy outlines the management of the collection, use, disclosure and handling of, or otherwise processes the personal information of its:

- customers,
- receivers of cargo consigned to us or our services
- visitors to any GCW group of companies' websites or premises
- any employees and contractors within the GCW group of companies
- any personnel from a suppliers or other business partners to the GCW group of companies
- any others with whom any of the GCW group of companies deals with unless otherwise stated, GCW group of companies is the data controller for personal data we collect from you, or you provide to us.

How we collect your personal information

Primary Purpose:

We will only collect personal information from you for business purposes. which include providing home, corporate and commercial services. Such personal information collected includes contents and locations of items stored with us.

Secondary Purposes:

We also collect and hold personal information for secondary purposes.

These includes:

- customers' names and addresses for contact and billing
- information relating to previous services provided by us
- details of persons authorised to access information
- employment or financial information.

The information obtained for Secondary Purposes will not be used or disclosed otherwise than in accordance with this Privacy Policy.

Group Management