

Overview

Simon National Carriers (ABN 24 009 898 159) recognises that your privacy is important. This document is our Privacy Policy and it tells you how we collect and manage your personal information (including the personal information Simon National Carriers will collect from you when you access our website) and how we will use that information.

We respect your rights to privacy under the Privacy Act 1988 (Cth) (Privacy Act) and we comply with all the Privacy Act's requirements, including those incorporated by virtue of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth), in respect of the collection, management and disclosure of your personal information.

Scope

In accordance with the privacy laws of Australia, this Privacy Policy ("Policy") outlines how Simon National Carriers 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 Simon National Carriers websites or premises, Simon National Carriers employees and contractors, a contact at one of Simon National Carriers suppliers or other business partners, and others with whom Simon National Carriers deals with ("you") in accordance with these legal requirements.

Unless otherwise stated, Simon National Carriers is the data controller for personal data we collect from you or you provide to us.

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, Simon National Carriers collects personal data about you, to enable Simon National Carriers to effectively conduct its businesses. This personal data must be sufficiently detailed for Simon National Carriers 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 Simon National Carriers.

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.

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 licence number or 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;
- 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 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 Simon National Carriers, including previous services provided by Simon National Carriers 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 Simon National Carriers (in any other case);
- 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;
- 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.

SIMON NATIONAL CARRIERS DOES NOT COLLECT PERSONAL DATA FOR THE FOR THE PURPOSE OF SELLING IT TO THIRD PARTIES.

Simon National Carriers only collects personal data to provide its services to its customers and effectively conduct its businesses.

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. 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. 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.

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 Simon National Carriers 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 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 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.
- As part of our efforts to keep our site safe and secure;

Simon National Carriers does not sell personal data that you give to us, we collect from you, or we receive from other sources.

Simon National Carriers 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;
- 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.

Access, Correction and Retention

We try to ensure that personal data we hold is adequate, relevant, accurate, complete, and up to date. 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, readily useable and machine-readable format and to transmit that information to another service provider.

You can object to and or opt-out of our use of your personal information for direct marketing purposes. As noted above, Simon National Carriers does not sell personal data collected to third parties.

To ensure the integrity and safety of personal data, Simon National Carriers only discloses the personal data it holds to the individual concerned, their legally authorised representative, or to fulfil legal or regulatory requirements. 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.

Simon National Carriers 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 Simon National Carriers computer network. Simon National Carriers 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 location within Australia.

It may be processed by staff operating outside Australia 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.

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, any national laws implementing the concepts of the European GDPR laws), your personal data may be disclosed, processed and transferred by Simon National Carriers 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 Simon National Carriers 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, Simon National Carriers will enter into data transfer agreements with the recipients of the personal data to ensure that the recipient abides by Simon National Carriers 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.



David Simon
Chief Executive Officer (CEO)