

MONDIALE VGL

Mondiale VGL Privacy Policy

Mondiale VGL Pty Ltd (ABN 68 002 433 267) (referred to as **we**, **us** or **our**) has implemented this Privacy Policy to provide users of our websites www.mondialevgl.com or www.mondialevglonetrack.com (**Website**) and our other services with information about how we collect, hold and use Personal Information you provide to us. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 10.

Mondiale VGL is related to other entities (related entities) and this Privacy Policy applies if your personal information is dealt with by those related entities. A reference in this Privacy Policy to Mondiale VGL, we, us or our also refers to our related entities.

We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy, posted on our Website at: <https://mondialevgl.com>.

1. What Personal Information do we collect?

1.1 "**Personal Information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

1.2 Personal Information collected may include (but is not limited to) the following:

- (a) name, postal and email address;
- (b) Australian Business Number;
- (c) date of birth;
- (d) contact details including telephone numbers (landline and mobile) and facsimile numbers;
- (e) photos or video;
- (f) gender;
- (g) occupation and employment details;
- (h) driving licence, including driving licence number;
- (i) biometric data;
- (j) credit history and other financial information, including your ABN or ACN;
- (k) personal information relating to your customers' suppliers and customers;
- (l) payment details, such as your credit card details or your bank account and BSB number details; and
- (m) personal details of directors, partners, proprietors or shareholders of your business.

2. When and why we collect Personal Information

- 2.1 We collect your Personal Information to allow us to conduct our business functions, to market and sell our products and services and for the specified purposes set out in paragraph 4.1.
- 2.2 We may collect your Personal Information when you:
- (a) apply to be a supplier of goods and services to us;
 - (b) apply for a customer account with us;
 - (c) visit our Website (see paragraph 3);
 - (d) buy or request to use our products or services;
 - (e) register for or use an account or subscription package on our Website;
 - (f) request information about us, our products or our services;
 - (g) provide feedback;
 - (h) fill in a form on our Website;
 - (i) in the course of providing you with goods or services;
 - (j) or your employer provides that information to us in the course of conducting or administering our relationship with you;
 - (k) when you enter one of our sites or request entry to our sites;
 - (l) as set out in your Customer Account Application and Credit Reporting Policy , if you apply for credit; or
 - (m) contact us by telephone, fax, email, post or in person.
- 2.3 We may also collect Personal Information about you via third parties (ie other organisations) including financial reporting bodies such as the Australian Securities and Investments Commission. However we will only collect your Personal Information in this way if it is unreasonable or impractical to collect this information directly from you or if we are otherwise permitted to do so.
- 2.4 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

3. Information collected via our Website

- 3.1 Personal information may be collected by us and by our third party service providers who assist us in operating the Website.

Google Analytics

- 3.2 We use Google Analytics to help analyse how you use our Website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Website. Google will store this information. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personally identifiable information of visitors to our Website. We will not associate any data gathered from this Website with any personal information from any source as part of our use of Google Analytics.
- 3.3 If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Cookies

- 3.4 Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our website.
- 3.5 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our website or click-through an email we send you, a cookie may be downloaded onto your computer's hard drive.
- 3.6 Cookies may also be used for other purposes on our website but in each case none of the information collected can be used to personally identify you.
- 3.7 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.
- 3.8 If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Third party content (eg social media links)

- 3.9 Some of the content on our Website includes applications made available by third parties, such as social media buttons or links that allow you to share content or links to our Website through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

4. How we use your Personal Information

- 4.1 We use the Personal Information we collect about you for our business functions and activities, which may include the following:
- (a) to communicate with you and provide you and your nominated parties with information, notifications, products or services you have requested;
 - (b) if you are a customer or supplier, to assist you by providing you with information and support;
 - (c) to authenticate your identity to provide you with access to our sites;
 - (d) to manage and administer any account you may hold with us;
 - (e) to promote and market our products and services to you or provide you with information that we believe may be of interest to you;
 - (f) to provide you with information about products or services you may be interested in from us and our business partners;
 - (g) to personalise and customise your experiences on our Website;
 - (h) to help us research the needs of our customers and to market our products and services with a better understanding of your needs and the needs of customers generally;
 - (i) to conduct research for the purposes of improving existing products or services or creating new products or services;

- (j) if you are an employee or other representative of a customer to which we provide our products and services or a supplier or service provider to us, to communicate with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy;
- (k) if you are a customer (or applying to become a customer to us), to determine your ability make payments to us for goods or services, including by carrying out credit checks and credit reporting where you or your business are seeking to use a credit facility, but only in accordance with our Credit Reporting Policy;
- (l) if you are a supplier to us (or applying to become a supplier to us), to determine your suitability to provide us with goods or services;
- (m) if applicable, carry out checks on the Personal Property and Securities Register (PPSR) (which may involve a disclosure to the PPSR operator) to confirm your business' ACN or ABN where you have applied for credit;
- (n) manage our accounts and carry out debt and equipment recovery functions;
- (o) provide you with ongoing information that we believe you may be interested in receiving;
- (p) to allow us to provide advertising material to you regarding us, our clients, and other business partners; and
- (q) share your Personal Information with our related entities, business partners and selected third parties.

4.2 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.

4.3 You consent to us using your Personal Information in the above ways.

4.4 We may collect and use your Personal Information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your Personal Information.

4.5 We may also collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Policy or any agreement you enter into with us; or
- (b) required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.

4.6 If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, we may not be able to undertake certain activities for you such as providing you with requested information, products or services or facilitate smooth delivery of the services requested.

5. To whom we disclose your Personal Information

5.1 Mondiale VGL may disclose, or provide access to, your personal information to third parties in connection with the purposes described in paragraph 4.1. Depending on the nature of your engagement with us, we may disclose your Personal Information to our related entities including our international offices or to third parties that provide products and services to us or through us. We may also disclose your Personal Information to government agencies in accordance with our obligations under the *Customs Act 1901 (Cth)* and the *Biosecurity Act 2015 (Cth)*.

5.2 We may also disclose your Personal Information to our website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

6. Overseas disclosures

- 6.1 Some of your Personal Information may be transferred, stored, processed or used overseas by us or by third party service providers. This may happen if our related entities are overseas, if we outsource certain activities overseas or if transactions, information, services or products have an overseas connection. You consent to the collection, use, storage, and processing of your Personal Information outside of Australia.
- 6.2 In particular, your Personal Information may be disclosed to third party service providers which may store your Personal Information in China, Hong Kong, Italy, Germany and New Zealand, and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy, without us being responsible under the *Privacy Act 1988 (Cth)* for such use (or for any breach). Mondiale VGL is a global logistics business. The nature of our organisation means that we may be required to deliver freight or provide services to a large number of overseas countries. If we provide services, on your behalf, to a country where we use a third party overseas agent, we may need to disclose your Personal Information to that overseas agent. In these circumstances, you consent to the collection, use, storage and processing of your Personal Information in those countries. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

7. Marketing

- 7.1 You consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, telemarketing, email, SMS and MMS messages
- 7.2 If you do not want to receive marketing information from us or if you want to stop receiving telemarketing, you can do so by contacting us using the contact details specified in paragraph 10.
- 7.3 If you provide your consent to receiving direct marketing from our partners, we will provide them with your Personal Information to enable them to send information and advertising material to you. You can opt out of receiving this material from third parties by using the contact details specified in paragraph 10 if you do not want to receive marketing information from us.

8. Accessing and updating your Personal Information

- 8.1 You are entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where required by law.
- 8.2 You can access and correct some of your Personal Information by contacting Mondiale VGL by telephone or via the 'contact us' page on our Website. Alternatively, a request for access can be made by contacting our Privacy Officer in any of the ways specified in paragraph 10.
- 8.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete. Please contact

us in any of the ways specified in paragraph 10 if you believe that the Personal Information is inaccurate or incomplete, and we will use all reasonable efforts to correct the information.

9. Storage and security of Personal Information held by us

- 9.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our Website or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption etc) and procedural methods.
- 9.2 We do not collect sensitive or financial information about our users via our Website.
- 9.3 If we find that we have no further need for your Personal Information we may remove it from our systems and destroy all record of it.

10. What to do if you have a question, problem or complaint about our use of your Personal Information or this Privacy Policy

10.1 If you:

- (a) have a query or concern about this Privacy Policy or our Personal Information handling processes;
- (b) wish to make a complaint in relation to a breach of your privacy;
- (c) would like to access your Personal Information held by us;
- (d) would like to opt out of direct marketing; or
- (e) would like to correct your Personal Information held by us,

please contact our Privacy Officer in any of the following

ways: » by email: privacy@mondialevgl.com

» by phone on:

- New South Wales +61 2 9695 3888
- Victoria +61 3 8325 7500

10.2 We will investigate your queries and complaints within a reasonable period of time of receiving the complaint and will notify you of the outcome of our investigation.

Last updated: August 2016