

Toll Group

Privacy Policy and Privacy Notice

Overview

Toll Holdings Pty Ltd 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 ("Privacy Policy").

Scope

This Privacy Policy, including jurisdiction specific addenda set out Attachment B as relevant, outlines Toll's management of the collection, use, disclosure and handling of, or how it otherwise processes the personal data of its customers (including their personnel) or receivers of cargo consigned to or transported by Toll (together "Customers"), visitors to its websites or premises, and its employees and contractors (all together with Customers, "you" or "your"), in accordance with the privacy laws of the countries in which Toll operates.

Unless otherwise stated, Toll is the data controller for personal data it collects.

Principles

Personal Data

In this Privacy 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, genetic, mental, economic, cultural, or social identity, or an opinion of that natural person.

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

Toll collects personal data about you to enable it to effectively conduct its business, including enabling it to fulfil its responsibilities as an integrated provider of forwarding, logistics, transport, warehousing, and related services, and in the case of its Toll People and Toll Transitions businesses, its responsibilities as a supplier of recruiting and relocation services. Toll only collects personal data to the extent that it is required for the specific purposes set out in this policy (as specifically detailed in "**Use and Disclosure of Personal Data**" below) or notified to you at the time of collection. Toll collects personal data with your consent as required and only in accordance with privacy laws of the countries in which it operates.

Toll generally collects personal data directly from you in person, in writing, by telephone, email or via its websites.

You are not required to supply any of the personal data that Toll may request. However, Toll 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 Toll employee, contractor, service provider, or customer if the personal data requested is not provided.

The information Toll collects depends on the business purpose and includes:

- contact information and any other personal information you choose to provide when you contact Toll or respond to its communications (e.g., email, telephone, correspondence in writing); and
- details (sometimes including content) of exchanged emails, telephone conversations, or other electronic communications with its employees and other staff members, recorded by its information technology systems.

Specific Collection Information for Customers

- Toll collects personal information:
 - when you as a Customer or candidate create an account or use or receive Toll's services, Toll or its service providers acting on its behalf, may collect the following types of information, but only if necessary:
 - your name, date of birth, driver number ID, personal ID, address, phone, email;Toll will use this information to fulfil your requests and/or provide the relevant services;
 - when you as a Customer request information about our services, subscribe to marketing communications, request

support, complete surveys, or sign up for an event or webinar;

- offline when you attend one of its events, when you contact customer support, or when you give it a business card (or similar).
- Toll may use this information in combination with other information it collects about you:
 - relating to your business relationship with Toll, including previous services provided by Toll to you or provided by you to Toll (in any other case);
 - if Toll has a business relationship with the organisation that you represent, or from your colleagues or other business contacts who provide it with such information; and
 - If Toll delivers a service to your organisation (such as a relocation service through Toll's specialist relocations business, Toll Transitions), it may collect personal data from the organisation purchasing the service (for example, in the case of relocation services, your destination address); and
- from its premises which have closed circuit TV systems or other monitoring devices – which may record you if you visit its premises, for security and safety purposes.

Specific Collection of Information for recruitment purposes

- Toll collects personal information from candidates which may include:
 - basic information, such as name, date of birth / age, contact details and gender, image and information provided to verify your identity gender, racial or ethnic origin, religion, health, and disability;
 - additional information which Toll may use in collaboration with service providers acting on its behalf to verify your identity or address, and to manage its exposure to risk, which may include:
 - taxpayer or government identification number, a copy of your government-issued identification, a photo of you, or other personal information; and
 - information about you from third parties such as credit bureaus and identity verification services;
 - information regarding your employment and educational history, any professional role, or roles for which you are applying or being considered and your relevant personal interests, attributes and career aspirations and plans, and results of background checks;
 - other information about yourself that you provide in a CV or similar document;
 - information regarding racial or ethnic origin, age, gender, health, and disability, which Toll collects for equality of opportunity monitoring purposes, only with your explicit consent;
 - information collected if you choose to provide Toll with access to certain personal information stored by third parties such as social media sites (such as Facebook and Twitter):
 - the information Toll has access to varies by site and is controlled by your privacy settings on that site and your authorisation;
 - financial information, including information regarding business expenses and salary, pensions, insurance, and other benefits (including bank account details); and
 - information from third party data providers or publicly available sources for anti-money-laundering, background checking and similar purposes, and to protect its business and comply with its legal and regulatory obligations.

Specific Collection of Information for employment purposes

- Toll collects personal information necessary for employment purposes. This information may include:
 - name, date of birth / age, gender, racial or ethnic origin, religion, trade union membership, marital status and related family information, business, and personal contact (including emergency contact) information, photograph, national insurance number or equivalent and passport number and other details;
 - citizenship and, where relevant, residency and work permit status and other immigration-related information;
 - relevant information regarding health and disabilities;
 - job title, department, responsibilities, responsible line manager(s), team members for whom you are responsible and related information such as your employee ID number;
 - employment terms and conditions, date of hire and resignation / termination (with reasons and related information), content of references obtained, employment history (with and before joining Toll), educational history, qualifications and results of background checks and assessment results;
 - information regarding business expenses and salary, pensions, insurance, and other benefits (including bank account details);
 - records of working hours, sickness and other absence records, records of training and development activities and plans and of performance appraisals and records of disciplinary and grievance processes, and depending on the nature of your position with Toll, records of your aspirations, mobility, and job competency assessments;
 - depending on the nature of your position with Toll, records of your role in Toll's business, HR, compliance, and other activities;

- records relating to personal trading and gifts received, inside information lists and lists relating to external activities / actual or potential conflicts of interest; and
- records relating to your access to both Toll's physical premises and information technology systems, including user profiles, account and log-in information and access rights and information as to your interactions with those systems (details of systems and websites accessed, emails and other communications sent and received (including their content; and including communications sent using personal accounts) and telephone calls made and received (including their content, when you have been notified that calls are recorded)).

TOLL DOES NOT COLLECT PERSONAL DATA FOR THE PURPOSE OF SELLING IT TO THIRD PARTIES.

Collection of Information via Toll's Websites

When you visit one of Toll's websites, information about your computer or web device is automatically recorded by its website. This includes your IP address and associated domain name (e.g. yourcompany.com), the date and time of your visit to Toll's 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 Toll or by a third-party service provider on its behalf. This information is collected for statistical and system administration purposes, and to improve Toll's web-based services. It does not readily identify individuals, and Toll will not attempt to identify individuals from the records its server generates unless it is necessary to do so for law enforcement purposes.

Cookies

Toll 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 Toll to identify your device, understand your use of its websites and set your preferences for future visits. Toll 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 Toll's 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 Toll uses are essential for its websites to operate, and that if you disable cookies altogether you will not be able to use all parts of its website.

Use and Disclosure of Personal Data

Your data will be processed fairly, lawfully and in an appropriate way in accordance with applicable laws.

Toll 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 Toll –

• General Visitors of Toll's Websites:

- to operate, manage, develop, and promote its business and, in particular, its relationship with the organisation you represent (if any) and related transactions;
- to ensure that content from its site is presented in the most effective manner for you and for your computer;
- to facilitate distribution of corporate communications such as its financial results and other information that is relevant to the promotion or reporting of its business activities;
- to protect its 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 its legal and regulatory obligations and bring and defend legal claims.

• As a Customer:

- to carry out its obligations arising from any contracts entered into between you and Toll and to provide you with the information, products, and services that you request from it;
- to provide you with support in relation to the products and services that you request from Toll;
- 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); and
- to the extent permitted by applicable law, permit selected third parties to provide you, with information about goods and services Toll feels may interest you.

- **As a Employment Candidate:**

- to manage the recruitment process and assess you for employment or other engagement;
- to monitor and improve its recruitment processes and for related purposes (including equality of opportunity monitoring);
- compliance with law and regulation; and
- for internal operations, including research, statistical and survey purposes, ensuring the security of its business and purposes relating to legal claims made against it.

Please note: if your application is unsuccessful, Toll may retain your candidate information and use it to assess your suitability for future positions and roles within the organization.

- **As an Employee:**

- as related to the operation of its business;
- for equal opportunity and diversity monitoring;
- for payroll operation and pension administration;
- for education and training;
- for career development (including providing references), appraisals, succession planning and performance management;
- for operation of employee benefits, plans and insurances;
- to administer and operate information technology systems and related policies and procedures;
- to carry out human resource and legal / regulatory compliance functions, including assessing compliance with your employment contract and related Toll policies;
- for management of grievances and disciplinary procedures;
- for business protection, including ensuring the physical security of its premises, guarding against breach of confidence / theft or infringement of intellectual property, fraud, cyber-attack, and other interference; and
- to assess its and its employees' compliance with law and regulation.

Information Toll collects about you -

- Toll will use this information:
 - to administer its site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve its 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 its service, when you choose to do so;
 - to keep its site safe and secure;
 - to measure or understand the effectiveness of advertising Toll serves 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 its site about goods or services that may interest you or them.

Information Toll receives from other sources –

- Toll will:
 - combine this information with information you give to it and information it collects about you; and
 - use this information and the combined information for the purposes set out above (depending on the types of information Toll receives).

TOLL DOES NOT SELL PERSONAL DATA THAT YOU GIVE TO US, IT COLLECTS FROM YOU, OR IT RECEIVES FROM OTHER SOURCES.

Toll only uses personal data for employment and recruitment purposes, and to provide, manage and administer the goods and services it provides. In the normal course of Toll's business operations, it may disclose personal data to related bodies corporate and statutory entities authorised to access the information.

Toll may from time-to-time review information about you held in its systems – including the contents of and other information related to your email and other communications with it – 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.

Sharing your Personal Information

- You agree that Toll has the right to share your personal information with:
 - Any member of its group, which means its subsidiaries, its 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 Toll enters 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 Toll in the improvement and optimisation of its site;
 - credit reference agencies for the purpose of assessing your credit score where this is a condition of Toll entering into a contract with you;
 - potential employers (in the case of its Toll People business); and
 - another entity in the event Toll sells or transfers all or a portion of its business or assets. Should such a sale or transfer occur, Toll will use reasonable efforts to direct the transferee to use personal data you have provided to Toll in a manner that is consistent with the principles described in this Privacy Policy;
 - In exceptional circumstances:
 - to competent regulatory, prosecuting, and other governmental agencies, or litigation counterparties, in any country or territory; or
 - where Toll is required by law to disclose.

Access, Correction and Retention

Toll tries to ensure that personal data it holds is adequate, relevant, accurate, complete and up to date. You can contact the Global Data Protection Officer or the relevant Data Protection Liaison for your jurisdiction (if applicable) listed in Attachment A to this Privacy Policy if you would like details of personal data which may be held about you. You have the right to access the personal data Toll holds 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 Toll 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 its use of your personal information for direct marketing purposes. As noted above, Toll does not sell personal data collected to third parties.

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 Toll 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") or applicable laws with similar requirements. To ascertain what fee Toll may charge, please contact the Global Data Protection Officer or the relevant Data Protection Liaison for your jurisdiction (if applicable) listed in Attachment A to this Privacy Policy.

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

Access, Correction of Employee Personal Data

- With limited exceptions, employees and former employees have legal rights to access copies of the personal information that Toll holds about them and to require inaccurate information to be corrected. If you wish to exercise any of these rights or have further enquiries about your rights in relation to your personal information, please contact the Global Data Protection Officer or the relevant Data Protection Officer for your jurisdiction (if applicable) listed in Attachment A to this Privacy Policy.

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

Note that Toll may retain some limited information about you even when it knows that you have left the organisation that you represent, so that Toll can maintain a continuous relationship with you if and when it is 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 Toll collects from you may be transferred to, and stored at, a destination outside of the country in which it was collected. It may also be processed by staff operating outside the of these jurisdictions who work for it or for one of Toll's suppliers. This includes managers based in other jurisdictions, staff engaged in, among other things, the provision of support

services. By submitting your personal data, you agree to this transfer, storing or processing. Toll 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 Toll is stored on its secure servers. Where Toll has given you (or where you have chosen) a password which enables you to access certain parts of its site, you are responsible for keeping this password confidential. Toll asks you not to share a password with anyone. Your personal data will be processed in accordance with Toll's data security policies. Toll will maintain data security by protecting the confidentiality, integrity, and availability of the personal data it holds.

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

Toll 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 Australian Privacy Law, (Cth), the GDPR and any national laws implementing the GDPR, and the Personal Information Protection Law - China), your personal data may be disclosed, processed, and transferred by Toll on a worldwide basis for the purposes of providing its services. Personal data may be disclosed or transferred to agents, or third parties authorised to act on Toll's 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 enters into data transfer agreements (as applicable on terms approved for this purpose by the European Commission) with the recipients of the personal data requiring the recipient to abide by Toll's obligations under any applicable privacy / data protection laws.

Use of Toll's Websites

Toll's website may contain links to other websites that it does not own, operate, or endorse. Toll is 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 Privacy Policy

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

Further Information

Please refer to Attachment B for country specific information if relevant.

Toll may amend this Privacy Policy from time to time, and because of that you should review it regularly. Updated versions of this Privacy Policy will be placed on its website (<http://www.tollgroup.com>).

If you have any queries with regard to the processing of your personal data, 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 Global Data Protection Officer or the Data Protection Liaison for your jurisdiction (if applicable) via the contact details listed on Attachment A to this Privacy Policy. The Data Protection team is also available to help with information requests, take suggestions or handle complaints.



Alan Beacham
Managing Director
Toll Group
24 April 2024

Related Documents

Data Subject Access Request Guidance

Attachment A

Data Protection Contacts for Relevant Jurisdictions

Global

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Australia

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EU (GDPR)

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Vietnam

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Attachment B

Country Specific Addenda

China