



## **PRIVACY POLICY**

### **Overview**

Freeman Freighters PTY LTD values 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 Freeman Freighters operates, this Privacy Policy ("Policy") outlines how Freeman Freighters manages the collection, use, disclosure and handling of your personal data in accordance with these legal requirements.

### **Principles**

#### *Personal Data*

In this Policy, "personal data" means any information relating to an identified 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 his 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 ideological or ethical beliefs, sexual life, 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 fulfill our responsibilities as an integrated provider of logistics and, in the case of our Freeman Freighters People and Freeman Freighters Transitions businesses, our responsibilities as a supplier of recruiting and relocation services, Freeman Freighters collects personal data about its employees, clients, suppliers, sub-contractors and others with whom it deals, to enable Freeman Freighters to effectively conduct its businesses. This personal data must be sufficiently detailed for Freeman Freighters to effectively conduct its businesses. Where Freeman Freighters collects data on its employees, additional requirements may apply. Please contact the data controller or HR Manager in the jurisdiction where you are employed for additional information in relation to employee information.



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.

We only collect personal data for our business purposes. For example, we collect information that is necessary for the establishment and maintenance of records for our employees, clients, suppliers of goods and services, sub-contractors and others with whom we conduct business in order for Freeman Freighters to work effectively with them.

Depending on the business purpose, the personal data we collect may include: • name, address and contact details (including phone number and email); • information relating to previous services provided by Freeman Freighters; or • employment or financial information.

We generally collect personal data directly from you in person, in writing, by telephone, email or via our websites. For example, we may collect information when you ask us to provide services to you.

We may also collect personal data via third parties in some cases. For example, if we deliver a service to your organisation (such as a re- location service through Freeman Freighters specialist relocations business, Freeman Freighters Transitions), we may collect personal data from the organisation purchasing the service (for example, in the case of relocation services, your destination address).

#### *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.

**Effective: 03.08.2017 Policy Owner: Freeman Freighters PTY LTD**



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. Please consult the terms and conditions of use for this website 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**

We will only use personal data for the purpose for which it was collected or for related purposes permitted by law. Freeman Freighters 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.

Personal data collected is also used to facilitate distribution of corporate communications such as our financial results, annual reports and other information that is relevant to the promotion or reporting of our business activities. Personal information may also be disclosed to our contract service providers, including but not limited to customer service staff, consultants, advisers, IT and internet service providers.

We also disclose personal data to third parties in some cases. For example, in connection with our Freeman Freighters People business, we disclose the personal data of candidates to potential employers. We also retain the personal data of candidates who wish to be considered for future positions as and when they become available.

Freeman Freighters reserves the right to transfer, and you consent to Freeman Freighters transferring, your personal data to another entity in the event we sell to 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.



## **Transfer of personal data outside the country in which it was collected**

Some organisations to which we disclose personal data may be located, or may store the personal data on computer servers, outside the country in which the personal data was collected. Pursuant to any applicable privacy / data protection laws (including, without limitation, the European Data Protection Directive 1995 and any national laws implementing the European Data Protection Directive 1995), your personal data may be disclosed, processed and transferred by Freeman Freighters 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 Freeman Freighters 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, Freeman Freighters will enter into agreements with the recipients of the personal data to ensure that the recipient abides by Freeman Freighters obligations under any applicable privacy / data protection laws.

## **Access and Correction**

We try to ensure that personal data we hold is accurate, complete and up to date. You can contact the data controller (see below) if you would like details of personal data which may be held about you or if you wish to correct any personal information held. You have the right to access the personal data we hold about you.

To ensure the integrity and safety of personal data, Freeman Freighters only discloses the personal data it holds to the individual concerned, their legally authorised representative, or to full legal or regulatory requirements. Freeman Freighters may also disclose personal data to its advisers and other parties in connection with the present and future conduct of its business. In some circumstances we may charge a fee, but we will not charge you for lodging a request for access. To ascertain what fee we may charge, please contact the data controller in the jurisdiction where you are located (see below). Freeman Freighters will destroy any personal data we hold about you as soon as it is no longer reasonably required and we are legally able to do



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

Personal data is principally held in electronic databases maintained within Freeman Freighters computer network. Freeman Freighters 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.

### **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.

### **Darren Freeman**

Managing Director Freeman Freighters, 2017