

## POLICY STATEMENT

### 1. About this Privacy Policy

- 1.1 Traffic Technologies Ltd ABN 21 080 415 407 (referred to as **Traffic Technologies, we, us or our**) manufactures and sells road & traffic signage, commercial & corporate signage and associated road maintenance products. Traffic Technologies has implemented this Privacy Policy to provide information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. 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 13.
- 1.2 Traffic Technologies is related to other companies and entities (related entities). This Privacy Policy applies to the collection and use of your Personal Information by us and by those related entities. Those related entities may also have their own privacy policies which set out additional detail or differences in their privacy practices. To the extent that those privacy policies are inconsistent with this Privacy Policy, those privacy policies will prevail over this Privacy Policy in relation to the actions of those related entities. A reference in this Privacy Policy to **Traffic Technologies, we, us or our** is also a reference to those related entities.

### 2. Personal Information

- 2.1 "**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.

### 3. What Personal Information do we collect and hold?

- 3.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them, but is primarily to service our financial, human resources, sales, customer service and manufacturing requirements. Personal Information that we collect may include (but is not limited to) the following:
- (a) name
  - (b) age and/or date of birth
  - (c) contact details including telephone numbers (landline and/or mobile)
  - (d) current and previous address (including postal address)
  - (e) email address
  - (f) identification information such as driving licence details, including driving licence number
  - (g) payment details, such as your bank account details
  - (h) information about our employees, including tax file numbers, social security numbers and similar information
  - (i) payroll data including information about our employees such as taxation, salary, allowances, leave, deductions and general benefits (superannuation or the equivalent)
  - (j) customer trading details
  - (k) credit history
  - (l) trade references, credit references or reports from a third party
  - (m) credit information
  - (n) product specification details

- (o) occupation and employment details including employment status and any previous work experience
- (p) information from or in connection with your resume or job application if you apply for a position with us, and
- (q) Australian Business Number (ABN).

**3.2 We collect and record Personal Information about individuals such as:**

- (a) our customers, potential customers and their representatives
- (b) our suppliers and potential suppliers and their representatives, directors, partners, proprietors and shareholders
- (c) contractors and subcontractors and potential contractors and subcontractors and their representatives in relation to providing goods and services to us
- (d) our investors and shareholders
- (e) our employees past and present, including applicants, and
- (f) any other person who comes into contact with Traffic Technologies.

**4. How and when do we collect Personal Information?**

4.1 We collect your Personal Information to allow us to conduct our business functions, to provide, market and sell our products and services and for the specified purposes set out in paragraph 6. In some circumstances the collection of Personal Information may be required by law.

4.2 We may collect your Personal Information in the course of providing you with goods or services, or:

- (a) when you use or buy our products or services
- (b) when you provide us, or you offer or apply to supply us, with goods or services
- (c) when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card)
- (d) when you request information about us, our products or our services
- (e) when you provide feedback to us
- (f) when you visit or fill in a form on our Website (see paragraph 5)
- (g) when you visit premises from which we operate
- (h) when you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our business operations
- (i) when you submit a job application to us
- (j) when you otherwise contact us by telephone, fax, email, social media, post or in person, or
- (k) where we are otherwise required or authorised by law to do so.

4.3 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect personal information directly from the relevant individual where reasonable and practicable.

4.4 We may also collect Personal Information about you from third parties and other sources such as:

- (a) your nominated representatives (eg spouse accountant, power of attorney, brokers and other professional advisors)
- (b) your employer
- (c) our share registry service provider

- (d) publicly available sources of information. or
- (e) related entities, companies and businesses of Traffic Technologies,

but we will only collect your Personal Information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.

- 4.5 From time to time, the Personal Information we collect may include sensitive information, including health information. We will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.
- 4.6 Where we engage with you multiple times over a short period in relation to the same matter, we might not provide you with a separate notice about privacy each time we engage with you.
- 4.7 In most cases, if you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information we require, we may not be able to provide you with requested information, products or services, or to effectively conduct our relationship with you.

## 5. Information collected via our Website

- 5.1 Personal Information may be collected by us and by our third party service providers who assist us in operating our website at <http://www.trafficltd.com.au>.
- 5.2 We may use various technological methods from time to time to track the visiting patterns of individuals accessing our Website, including but not limited to the methods set out in this paragraph 5.

### ***Click Stream Data***

- 5.3 When you read, browse or download information from our Website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded.

### ***Cookies***

- 5.4 Our Website may use 'cookies' from time to time. 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 may use this information to enhance the content and services offered on our Website.
- 5.5 Cookies may 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 to our Website from a link in an email we send you, a cookie may be downloaded onto your computer's hard drive.
- 5.6 Cookies may also be used for other purposes on our Website.
- 5.7 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.

- 5.8 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)***

- 5.9 From time to time, some of the content on our may Website include 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.

**6. How do we use your Personal Information?**

- 6.1 We use the Personal Information we collect about you for our business functions and activities, in order to operate our business efficiently, and to market our products and services for the benefit of our customers.
- 6.2 We may collect, hold and use your personal information:
- (a) to identify and communicate with you
  - (b) to enable us to provide you with requested information, products or services
  - (c) to enable us to manufacture products as requested abiding by any regulatory or legislative requirements
  - (d) to enable us to meet our business, human resources, manufacturing, OH&S and quality assurance requirements
  - (e) to otherwise assist customers by providing them with information and support
  - (f) to establish the legitimacy and credit status of our customers
  - (g) to collect and process payments
  - (h) to help us to manage and enhance products or services we provide to you
  - (i) to help us to manage and enhance goods and services we procure from our suppliers and subcontractors
  - (j) to personalise and customise your experiences on our Website
  - (k) to help us manage and respond to a general or specific shareholder enquiry
  - (l) to process share applications and service shareholders' needs
  - (m) to provide facilities and services a shareholder may request
  - (n) to carry out appropriate administration in relation to our shareholders and our share registry
  - (o) to manage and administer any account you may hold with us
  - (p) to promote and market our products and services to you
  - (q) to provide you with information that we believe may be of interest to you or that you may be interested in receiving, including advertising material, regarding us, our clients, and our business partners
  - (r) to conduct research for the purposes of improving existing products or services or creating new products or services
  - (s) to help us research the needs of our customers to enable us to market our products and services with a better understanding of your needs and the needs of customers generally
  - (t) to analyse our shareholder base and for product development and planning

- (u) to provide for the safety and security of workers and onsite visitors
- (v) to help us manage our business operations
- (w) for business support purposes including maintenance, backup and audit
- (x) to process any job application submitted by you
- (y) to respond to any queries or complaints you may have, or
- (z) to comply with our statutory and legal obligations.

- 6.3 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.
- 6.4 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.
- 6.5 We may otherwise 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)*.

## 7. When do we disclose your Personal Information?

- 7.1 Traffic Technologies may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraph 6. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).
- 7.2 We may also disclose your Personal Information to:
- (a) any of Traffic Technologies' related entities, internal divisions, business units or departments
  - (b) your nominated representatives
  - (c) your employer (and its related companies if required) to whom we provide our products and services, if applicable
  - (d) other organisations or individuals who assist us in providing products and services to you
  - (e) professional service providers and advisors who perform functions on our behalf, such as lawyers accounting firms, auditors, management consultants, lodgement service providers and benefit processing providers
  - (f) our insurers, if required for the purpose of arranging insurance coverage in respect of our functions and activities and for the purpose of pursuing any applicable insurance claims
  - (g) medical providers including medical and rehabilitation practitioners for assessing insurance claims
  - (h) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development, and in the manufacturing and installation of road & traffic signage and associated products & road maintenance services), and
  - (i) Government, regulatory authorities, law enforcement agencies, courts and other organisations as required or authorised by law.

7.3 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.

7.4 We may also disclose your Personal Information to a purchaser or potential purchaser in connection with the sale or potential sale of Traffic Technologies, our business or any of our assets, including in insolvency, in circumstances which require the purchaser or potential purchaser to use such Personal Information consistently with this Privacy Policy.

### **8. Overseas disclosures**

8.1 Some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. This may happen if:

- (a) our offices or related entities are overseas
- (b) we outsource certain activities overseas
- (c) transactions, information, services or products have an overseas connection, or
- (d) our computer systems including IT servers are located overseas.

8.2 You consent to the collection, use, storage, and processing of your Personal Information outside of Australia as set out in this Privacy Policy.

8.3 In particular, your Personal Information may be disclosed to third parties in the United Kingdom, 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. In these circumstances, you consent to the collection, use, storage and processing of your Personal Information in those countries, without us being responsible under the Australian *Privacy Act 1988 (Cth)* for such use (or for any breach). Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you might not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

### **9. Other uses and disclosures**

9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect or use your Personal Information.

### **10. Marketing**

10.1 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 social media, direct mail, telemarketing, email, SMS and MMS messages.

10.2 If you do not want to receive marketing information from us or if you want to stop receiving telemarketing, you can unsubscribe in any of the following ways:

- (a) clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us



- (b) logging into your account on the Website and editing your communication preferences, or
- (c) contacting us using the contact details specified in paragraph 13.

### **11. Storage and security of Personal Information held by us**

- 11.1 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.
- 11.2 We require employees, contractors and subcontractors to perform their duties in a manner that is consistent with Traffic Technologies' legal responsibilities in relation to privacy. We will take all reasonable steps to ensure that paper and electronic records containing personal information is stored in facilities that are only accessible by people within Traffic Technologies who have a genuine "need to know" as well as "right to know".
- 11.3 If we find that we no longer require or have no further need for your Personal Information we may de-identify it or remove it from our systems and destroy all record of it. We will generally take steps to destroy or de-identify personal information after as short a time as possible and after a maximum of seven years, unless the law permits or requires otherwise.

### **12. You can access and update your Personal Information**

- 12.1 You are generally 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. Depending on the nature of the request, Traffic Technologies may charge for providing access to this information, however such charge will not be excessive. 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 we are required by law to give those reasons.
- 12.2 If you are an employee of a client, you may also contact your employer to request access to, or to correct, your Personal Information that we hold about you and process on their behalf. Alternatively, a request for access can be made by contacting the relevant department manager/supervisor at Traffic Technologies or by contacting our Privacy Officer in any of the ways specified in paragraph 15.
- 12.3 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.
- 12.4 Please contact the relevant department manager/supervisor at Traffic Technologies, or otherwise contact us in any of the ways specified in paragraph 15, if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.
- 12.5 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

**13. How do we deal with complaints about privacy?**

- 13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy, please contact the relevant department manager/supervisor at Traffic Technologies or otherwise contact our Privacy Officer in any of the ways specified in paragraph 15 and advise us as soon as possible. We will investigate your queries and privacy complaints within a reasonable period of time depending on the complexity of the complaint. Relevant complaints will be managed in accordance with Traffic Technologies - HR Policy and Procedures; CP3 (Grievances).
- 13.2 It would assist us to respond to your complaint promptly if it is made in writing. Please detail information relevant to your complaint.
- 13.3 We will notify you of the outcome of our investigation.

**14. Updates to this Privacy Policy**

- 14.1 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 <http://www.trafficltd.com.au>. Any changes to this Privacy Policy may be advised to you by updating this page on our Website. We encourage you to check this page from time to time for any changes.

**15. What to do if you have a question, problem or want to contact us about our use of your Personal Information or this Privacy Policy**

- 15.1 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 update or correct your Personal Information held by us, or
  - (e) would like to opt out of direct marketing,

please contact our Privacy Officer in any of the following ways:

- » Email Address: [peter.crafter@trafficltd.com.au](mailto:peter.crafter@trafficltd.com.au)
- » Mailing Address: 31 Brisbane Street, Eltham VIC 3095
- » Facsimile Number: 03 9430 0244, or
- » Phone: 03 9430 0207.