



PRIVACY POLICY

1. INTRODUCTION

- 1.1 Land Group comprises a number of associated companies that offer a range of transport and storage services in Australia. The companies within the Land Group are listed below:
- (a) BRL Equipment Pty Ltd (A.C.N. 167 555 160);
 - (b) BRL Holdings Pty Ltd (A.C.N. 067 554 563);
 - (c) BRL Property Holdings Pty Ltd (A.C.N. 655 805 708);
 - (d) Raebar Pty Ltd (A.C.N. 065 128 985) atf the Land Property Trust (A.B.N. 38 798 988 737);
 - (e) BRL Property Leasing Pty Ltd (A.C.N. 623 854 786);
 - (f) Land Storage & Distribution Pty Ltd (A.C.N.119 744 982);
 - (g) Land Transport Haulage Pty Ltd (A.C.N. 649 346 136); and
 - (h) Freightrite Transport Pty Ltd (A.C.N. 092 605 135).
- 1.2 In the course of our business in Australia, we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.
- 1.3 We recognise that the privacy of personal information is important, and we are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) in relation to all personal information we collect and hold. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the applicable legal requirements with respect to the management of personal information, with the exception of certain employee records.
- 1.4 This privacy policy also incorporates our policy on managing credit information (see section 7 below).
- 1.5 This policy is effective from 4 December 2025.

Who does the privacy policy apply to?

- 1.6 This policy applies to any person in relation to whom we currently hold, or may in the future collect, personal information. Broadly, we only collect personal information from customers, subcontractors and agents who perform services on our behalf, and from prospective employees and prospective subcontractors.
- 1.7 Nothing in this policy prevents Land Group from collecting or disclosing personal information that comprises employee records of current or former employees, provided such collection or disclosure does not breach the Privacy Act.

What information does the privacy policy apply to?

- 1.8 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.9 Information is not personal information where the information cannot be linked to an identifiable individual.

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2. HOW DO WE MANAGE AND PROTECT THE PERSONAL INFORMATION WE COLLECT?

- 2.1 We manage the personal information we collect in numerous ways, such as by:
- (a) implementing procedures for identifying and managing privacy risks;
 - (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
 - (c) providing staff with training on privacy issues and on their obligations under the Privacy Act;
 - (d) appropriately supervising staff who regularly handle personal information;
 - (e) implementing mechanisms to ensure any agents or contractors who deal with us comply with the APPs;
 - (f) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints; and
 - (g) appointing a privacy officer within the business to monitor and manage privacy compliance under the Privacy Act.
- 2.2 We use various physical and electronic security measures to protect personal information held by the Land Group, including using:
- (a) security systems and other restrictions to limit access to Land Group's premises;
 - (b) secure electronic databases and software programs;
 - (c) unique usernames, passwords and other protections on systems that can access personal information;
 - (d) locked filing cabinets; and
 - (e) electronic security systems and firewalls, including anti-ransomware, anti-virus, anti-spyware measures and mail filtering software which blocks potential threats.
- 2.3 We will take reasonable steps to destroy or de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.
- 2.4 Because the nature of our business primarily involves packaging, transporting, storage, distribution and general freight services, it is generally not possible to use a pseudonym or remain anonymous when dealing with us. However, we may be able to offer you a temporary account and limited services if you wish to use a pseudonym or remain anonymous. If you want to use a pseudonym or remain anonymous when dealing with us, you should notify us and we will try to accommodate your request, subject to our ability to perform the services.

3. WHAT KINDS OF INFORMATION DO WE COLLECT AND HOLD?

- 3.1 The personal information we may collect differs, depending on whether you are a customer, a subcontractor or agent, or a prospective employee or a prospective subcontractor.

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Personal information (customers and suppliers)

- 3.2 If you are a customer or supplier (other than subcontractors), we may collect and hold personal information about you, which may include:
- (a) your contact details;
 - (b) financial and billing information;
 - (c) date and place of birth;
 - (d) information in publicly available company records about you;
 - (e) video footage from cameras in the Land Group's business premises;
 - (f) licensing information;
 - (g) details of any enquiries or complaints;
 - (h) any other personal information that we are legally required to collect; and
 - (i) in the case of customers, credit information, the management of which is explained in section 7.

Personal information (subcontractors and agents and prospective subcontractors, agents and prospective employees)

- 3.3 If you are a subcontractor or agent, or a prospective employee or a prospective subcontractor, we may collect and hold personal information about you, which may include:
- (a) sensitive information (see below);
 - (b) contact information including ID documents and emergency contact information;
 - (c) date of birth;
 - (d) employment arrangements and history including application form/s, interview documentation, reference checks, screening information, performance reviews and disciplinary records;
 - (e) insurance information and claims history;
 - (f) credit information;
 - (g) licence details;
 - (h) education details;
 - (i) driving history;
 - (j) banking and financial details;



- (k) medical information including medical testing, details of leave of absences or workplace accidents or injuries;
- (l) GPS data and other telemetry from in-vehicle management systems (IVMS) operated by MT Data and other logistics technology solutions including JAIX Logistics software;
- (m) Video footage from cameras in Land Group's depots; and
- (n) any other personal information required to engage you as our subcontractor or agent, or to consider offering you employment.

Sensitive information

3.4 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.

3.5 Generally, we do not collect sensitive information about customers.

3.6 However, we may collect sensitive information from and about subcontractors and agents, employees and prospective employees and prospective subcontractors, such as:

- (a) health or medical information (including but not limited to drug and alcohol testing results);
- (b) fingerprint scanning data;
- (c) membership of professional or trade associations; and
- (d) membership of trade unions.

3.7 We will not collect sensitive information without the individual's consent to which the information relates unless permitted under the Privacy Act.

4. HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?

4.1 Our usual approach to collecting personal information is to collect it directly from the individual concerned.

4.2 We may also collect personal information in other ways, such as from:

- (a) government bodies and agencies;
- (b) public records and registers;
- (c) courts and tribunals;
- (d) your current and previous employers;
- (e) recruitment agencies and labour hire providers;
- (f) entities that conduct drug and alcohol tests on our behalf;
- (g) doctors or other medical professionals who carry out health screening checks;
- (h) trade references;
- (i) in-vehicle management systems (IVMS) and other logistics technology solutions including JAIX Logistics software; and
- (j) online searches and social media.



- 4.3 If a person fails to provide Land Group with personal information that we seek, or if that information is inaccurate or incomplete, we may be unable to provide that person with transport or logistics services or to consider engaging or employing that person.

5. WHY DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

- 5.1 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which information is collected varies, depending on the particular service being provided or the individual from whom we are collecting the information but is generally as follows:
- (a) in the case of customers and potential customers – to provide you with packaging, storage, distribution or general freight and transport services; comply with legislation; and provide information about any additional services that we offer.
 - (b) in the case of subcontractors and agents – to assist us in providing our customers with high quality packaging, storage, distribution or general freight and transport services; and comply with legislative requirements.
 - (c) in the case of potential employees and potential subcontractors – to assess your suitability for employment or engagement.
- 5.2 Land Group collects personal information from in vehicle monitoring systems and closed-circuit television cameras:
- (a) as required by law, in the case of our customs licenced warehouse;
 - (b) to prevent and detect crime;
 - (c) to assist in providing a safe working environment;
 - (d) to protect Land Group’s property and the property of our customers, subcontractors, agents and visitors; and
 - (e) for quality and compliance purposes.
- 5.3 Land Group collects fingerprint data to monitor start and finish times of team members.
- 5.4 Personal information may also be used or disclosed by us for secondary purposes that are within an individual’s reasonable expectations and that are related to the primary purpose of collection.
- 5.5 We may collect and use customers’ personal information:
- (a) to assess eligibility for credit;
 - (b) to keep records of transactions to assist in future enquiries and enhance our customer relationship with you; and
 - (c) to send you special offers in relation to our services.
- 5.6 We may collect and use subcontractors’ and agents’ personal information:
- (a) to conduct checks to ensure that the subcontractor or agent can perform and is performing the services to our standards; and
 - (b) for payment purposes.



5.7 We may disclose personal information to:

- (a) our subcontractors;
- (b) entities that conduct licence checks for Land Group;
- (c) employers of individuals;
- (d) health practitioners and entities that provide drug and alcohol testing and other medical testing for us;
- (e) government bodies (such as Centrelink, police departments, the National Heavy Vehicle Regulator and State and Territories road transport authorities, and the Australian Taxation Office);
- (f) other service providers in order to provide the freight or transport service, or to assist our functions or activities (such as our advisers, consultants and compliance auditors);
- (g) insurance providers and brokers;
- (h) other entities within the Land Group;
- (i) customers of Land Group who require the information as part of their compliance procedures or systems or to meet legislative requirements; and
- (j) any third party technology providers including JAIX Logistics software, which provides software to allow Land Group to run its transport business.

5.8 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

6. WILL WE DISCLOSE PERSONAL INFORMATION OUTSIDE AUSTRALIA?

We generally do not disclose personal information outside of Australia. Land Group's software provider does not store or back up data entry overseas.

7. HOW DO WE COLLECT AND MANAGE YOUR CREDIT INFORMATION?

What kinds of credit information may we collect?

- 7.1 We generally do not collect credit information about subcontractors and employees.
- 7.2 In the course of providing our services to a customer, we may collect and hold the following kinds of credit information:
- (a) your identification information;
 - (b) information about any credit that has been provided to you;
 - (c) your repayment history;
 - (d) information about your overdue payments;
 - (e) whether terms and conditions of your credit arrangements with us are varied;
 - (f) whether any court proceedings are initiated against you in relation to your credit activities;

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- (g) information about any bankruptcy or debt agreements involving you; and
- (h) any publicly available information about your credit worthiness.

7.3 We may also collect personal information that may affect a customer's credit worthiness from other credit providers (e.g. trade referees and banks) that themselves may collect that information from credit reporting bodies. The kinds of personal information we collect may include any of those kinds of personal information outlined in section 3.2 of this policy.

7.4 We also use CreditorWatch which provides Land Group with credit risk information on customers and guarantors. We may disclose to CreditorWatch any serious failures by customers or guarantors in meeting payment obligations.

How and when do we collect credit information?

7.5 In most cases, we will only collect credit information about you directly from a customer or their trade referees.

7.6 Other sources we may collect credit information from include:

- (a) ASIC;
- (b) banks and other credit providers;
- (c) CreditorWatch (as outlined in paragraph 7.4);
- (d) your suppliers; and
- (e) our subcontractors and agents.

How do we store and hold the credit information?

7.7 We store and hold credit information in the manner outlined in section **Error! Reference source not found.** of this policy.

Why do we collect the credit information?

7.8 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with transport services.

7.9 We may also collect the credit information to:

- (a) process payments; and
- (b) assess eligibility for credit.

Overseas disclosure of the credit information

7.10 We will not disclose your credit information to entities overseas without an Australian link unless you expressly request us to.

How can I access my credit information, correct errors or make a complaint?

7.11 You can access and correct your credit information, or complain about a breach of your privacy in the manner set out in section 9 of this policy.



8. COLLECTION OF PERSONAL INFORMATION THROUGH OUR WEBSITE

8.1 Land Group's website provider may make and maintain records of Land Group's official website and the pages you visit so that we can:

- (a) monitor website traffic;
- (b) determine which of our services are popular; and
- (c) deliver customised content.

8.2 Land Group's website may also set cookies. A cookie is a text file that is placed on your hard disk by a webpage server. Cookies are uniquely assigned to you, and can only be read by a webserver in the domain that issued the cookie to you. A cookie notifies the webserver that you have returned to a specific page. For example, if you personalise Land Group's webpage or register with our site, a cookie:

- (a) helps recall your specific information on subsequent visits; and
- (b) simplifies the process of recording your personal information, such as your address or delivery address.

9. HOW DO YOU MAKE COMPLAINTS OR ACCESS AND CORRECT YOUR PERSONAL OR CREDIT INFORMATION?

9.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

Access to information and correcting personal information

9.2 Any person may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details of Land Group's Privacy Officer in this section or by emailing privacy@landtransport.com.au.

9.3 We will grant you access to your personal information as soon as possible, subject to the request circumstances.

9.4 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.

9.5 We may deny access to personal information if:

- (a) the request is unreasonable;
- (b) providing access would have an unreasonable impact on the privacy of another person;
- (c) providing access would pose a serious and imminent threat to the life or health of any person; or
- (d) there are other legal grounds to deny the request.



9.6 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed before it is levied.

9.7 If a request is made in accordance with section 9.2, Land Group will take reasonable steps to:

- (a) provide access to relevant personal information that it holds; and
- (b) correct any personal information if the data or information held is incomplete, irrelevant or misleading.

Complaints

9.8 If you want to complain about a breach of the Australian Privacy Principles regarding your privacy, you must follow the following process:

- (a) The complaint must first be made to us in writing to Land Group’s Privacy Officer, using the contact details in this section. We will have a reasonable time to respond to the complaint.
- (b) If the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner (see details at www.oaic.gov.au).

Who to contact

9.9 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

Privacy Officer: Karen Ciesiolka
Postal Address: PO Box 7213
TOOWOOMBA MAIL CENTRE QLD 4352
Telephone number: 07 4659 1333
Email address: privacy@landtransport.com.au

Changes to the policy

9.10 We may update or modify this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.

9.11 This policy is effective from 4 December 2025. If you have any comments on the policy, please contact our privacy officer using the contact details in section 9.9 of this policy.

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