

Privacy Policy

Doyle Group Holdings are committed to ensuring the privacy and confidentiality of your personal information. This Privacy Policy applies to personal information collected by us. We are bound by the Privacy Act 1988 (Cth), which governs the way private sector organisations collect, use, keep secure and disclose personal information.

In this Privacy Policy, the expressions "Doyle Group", "we", "us" and "our" are a reference to Doyle Group Holdings Pty Ltd ABN 91 678 199 507 and their Related Bodies Corporate and Related Entities.

This Privacy Policy applies to Personal Information and Sensitive Information collected by us. We are bound by the *Privacy Act 1988* (Cth), which governs the way private sector organisations collect, use, keep secure and disclose Personal Information.

By being a client of us, transacting with us, using our website or providing Personal Information to us in any way, you agree and consent to the collection, maintaining, holding, use and disclosure of your Personal Information as set out in this Privacy Policy.

We have taken steps to implement practices and procedures and systems to meet our commitment to you that information collected will be appropriately handled and managed and we are able to deal with any inquiries or complaints you may have about the way your Personal Information is dealt with by us.

As required by the Australian Privacy Principles, in addition to other things, this Privacy Policy sets out:-

- the type of Personal Information that is collected and held by us;
- how Personal Information is collected and held by us;
- why we collect, hold, use and disclose Personal Information;
- how you can access your Personal Information;
- how a complaint can be made and how it will be dealt with by us; and
- if your Personal Information is likely to be disclosed overseas.

We recommend that you keep this information for future reference.

1. Definitions

1.1 In this Privacy Policy:

- (a) "**Personal Information**" has the same meaning as it has under the *Privacy Act 1988* (Cth) as amended from time to time ("**Act**");
- (b) "**Primary Purpose**" means Personal or Sensitive Information about an individual that was collected for a particular purpose. Any use or disclosure of the information for another purpose is known as the "Secondary Purpose";
- (c) "**Related Body Corporate**" or "**Related Bodies Corporate**" has the same meaning as under the *Corporations Act 2001* (Cth);
- (d) "**Related Entity**" or "**Related Entities**" has the same meaning as under the *Corporations Act 2001* (Cth);
- (e) "**Services**" means the services and/or products provided by us or facilitated by us;
- (f) "**Sensitive Information**" has the same meaning as it has under the *Privacy Act 1988* (Cth);
- (g) "**Website**" means www.doyle.com.au or any other website or application we may establish or operate from time to time; and

- (h) the meaning of any general language is not restricted by any accompanying example, and the words 'includes', 'including', 'such as', 'for example' or similar words are not words of limitation.

2. Types of information that is collected and held by us

- 2.1 We collect Personal Information to provide our Services to our clients and the functions and activities undertaken by us. We collect Personal Information about staff, clients and other individuals who have dealings with us for administrative needs, to conduct our business, for legislative compliance and for marketing purposes.
- 2.2 The type of information we may collect from you includes (but is not limited to) the following:
- (a) your contact information such as full name (first, middle and last), e-mail address, current postal address, residential and delivery address (if different to postal address) and phone numbers;
 - (b) your date of birth;
 - (c) proof of your date of birth (including, but not limited to, driver's licence, passport, birth certificate);
 - (d) your financial information (such as credit card or bank account numbers);
 - (e) any additional information required to provide you with our Services including but not limited to products or services we have provided to you and/or that you have enquired about;
 - (f) your opinions, statements and endorsements collected personally or via surveys and questionnaires;
 - (g) if you are requesting products or services from us or we are purchasing goods or services from you, any relevant payment or billing information (including but not limited to bank account details, direct debit, credit card details, billing address, repayment information and invoice details); and
 - (h) any other information requested by us and/or provided by you or a third party.
- 2.3 Some of the Personal Information that we will collect and hold will be Sensitive Information. We only collect Sensitive Information where it is necessary for the purpose for which it is being collected and with the individual's consent unless the collection is required or authorised by law.

The type of Sensitive Information we may collect from you or record about you is dependent on the Services provided to you by us and will be limited to those purposes reasonably

necessary for our functions or activities. We do not use Sensitive Information to send you Direct Marketing Communications (as defined in paragraph 6 below) without your express consent.

- 2.4 We will provide notification at the point of collection of both Sensitive Information and Personal Information, as to the purpose for collection, and what the information will be used for.

3. How Personal Information is collected and held by us

- 3.1 We collect and hold information from a number of sources. Where possible and practicable, we will only collect information from the individual to whom it relates or with that individual's written consent and authority. This will usually be collected through client meetings and official administrative processes and searches, but it may also be collected from email, letters or other forms of communication and information

made available to us including our website and other third-party platforms including social media such as Facebook, Instagram and LinkedIn.

- 3.2 We also hold Personal Information about individuals that is generated in the course of our Services and as part of our operational activities. Information such as recruitment information, survey feedback and access to our website and seminars is also collected and held by us.
- 3.3 Personal Information is generally held in electronic form, on databases but may also be retained in paper form.
- 3.4 We are committed to paper reduction and client files and matters once finalised and closed will be retained in electronic format only with paper records returned or responsibly destroyed.
- 3.5 When an individual accesses our website, log files (“cookies”) can be created by the web server that contains certain information including the Internet Protocol (IP) address of the visitor, the previous site visited, the time and date of access and pages visited and downloaded. Cookies allow a website, to temporarily store information on an individual’s machine for later use. Our website may use cookies to identify unique visitors to the site.
- 3.6 In order to improve the services that we offer and to assist current and potential new clients, we may store information about users of our Website to create a digital profile and to assist with website performance and marketing purposes.
- 3.7 We may also use web analytics to obtain statistics about how our Website is accessed. Web analytics rely upon cookies to gather information for the purpose of providing statistical reports to us. The information generated by the cookie about an individual’s use of the Website is transmitted to and stored by web analytic service providers on servers located within and outside Australia, but it does not include any personally identifying information.
- 3.8 Individual users generally have the option of accepting or rejecting cookies by adjusting the settings in their web browsers. However, rejecting cookies may impact upon your functionality of our Website.
- 3.9 Our Website may contain links to other websites or pages. We cannot control the privacy controls of third party websites or providers. Third party sites are not subject to our Privacy Policy or procedures.

4. Why Personal Information is collected, held, used and disclosed

- 4.1 When we collect Personal Information from you, the reason for collecting it from you will usually be apparent or we will advise you why we are collecting that information and how we intend to use it. Sometimes the collection of the information is required or authorised by law and there are consequences for the individual if the Personal Information is not collected. You have the right to ask us at any time why Personal Information is being collected if you are unsure.
- 4.2 We may also collect Personal Information from your representatives, through our Website or other electronic communication channels, when sent to us via email or other communication from third parties, when required by law to do so, from publicly available sources of information, or when you enter into a competition or promotion or participate in a survey, from our suppliers or partners and from private vendors. We are not responsible for the conduct of third parties with respect to the handling of your Personal Information including any violations by third parties of its own privacy policy or applicable law/s.
- 4.3 You might also need to provide Personal Information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to have informed those individuals that you are giving their Personal Information to us and to have advised them about this Privacy Policy.

- 4.4 We may also purchase marketing data from third parties and add this to our database to use for our advertising and send promotional offers to you which we think that you may be interested in.
- 4.5 We will provide information about our Privacy Policy and about the right of individuals to access and correct Personal Information we may have collected. If we collect Personal Information in circumstances where the individual may not be aware of the collection, subject to our obligations with respect to confidentiality, we will advise those individuals of the collection of such information.
- 4.6 The purposes for which we collect, hold, use and disclose Personal Information is for a variety of different purposes relating to our functions and activities including:
- (a) the Primary Purpose for which it is collected and related Secondary Purposes;
 - (b) if required, the verification of your identity and the verification of your date of birth;
 - (c) conducting research;
 - (d) human resources management;
 - (e) the provision of our Services to you, including sharing information with entities acting as our agents to provide our Services;
 - (f) to communicate with you in order to provide you with our Services through various mediums such as email, SMS, social media, search engines and webpages;
 - (g) to facilitate the administration and management of us including analytical research, market research and business development;
 - (h) the administration and management of our Services, including charging, billing, credit card authorisation and verification, checks for financial standing, credit-worthiness (including but not limited to undertaking an assessment for credit loss and obtaining credit references from the trade references which have been nominated by you on your credit application form with us, if applicable), fraud and collecting debts;
 - (i) the improvement, development and delivery of our Services (including to contact you about improvements and asking you to participate in surveys about our Services);
 - (j) the maintenance, development and analysis of our Services, business systems and infrastructure;
 - (k) advertising, marketing and promotional activities by us and our related bodies and third parties that we consider may be of interest to you (including direct marketing by direct mail, telemarketing, email, SMS and MMS messages, competitions, public relations and social media) such as our customer loyalty programs, promotional offers and newsletters;
 - (l) to provide customer service functions, including handling customer enquiries and complaints and to resolve any disputes we may have;
 - (m) to offer you updates, or other content or products or Services that may be of interest to you;
 - (n) our compliance with applicable laws (including bankruptcy laws) and legal obligations, in response to a law enforcement agency's request, or where we have reason to believe that disclosing your Personal Information is necessary to identify, contact or commence legal action against a third party who may be causing injury or interference with our rights, property, Services or business ;
 - (o) the sale, and matters in connection with a potential sale, of our business or company to a third party, including mergers and transfers of the business or part thereof to a third party;

- (p) third parties to collect and process data such as Google Analytics, Facebook Pixel, Google AdWords or other relevant businesses – this may include parties that store data outside of Australia;
- (q) any other matters reasonably necessary to continue to provide our products and services to you;
- (r) where it is unreasonable or impracticable to obtain consent to the use or disclosure, and we reasonably believe the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety;
- (s) where we reasonably believe that the use or disclosure is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body; and
- (t) otherwise where you have given your consent for us to use the information for another purposes.

4.7 We may also use and/or disclose your Personal Information for other purposes which you consent to or which are required or permitted by law. This may include for a Secondary Purpose that is related to a purpose for which we collected it, and for which you would reasonably expect us to use or disclose your Personal Information.

4.8 In the event we propose to use or disclose such Personal Information other than for reasons in clauses 4.6, 4.7 and 4.10, we will first seek your consent prior to such disclosure or use.

4.9 If at any time you would like to unsubscribe from receiving future content, surveys, features or other marketing information or communications, we include in all electronic messages a statement to the effect that you, as the recipient, may send an unsubscribe message to us using the contact details provided in that electronic message. Otherwise you can contact us at any time to unsubscribe or update your preferences.

4.10 We may disclose your Personal Information (including, in certain limited circumstances, your Sensitive Information) for the purposes for which it was collected (as described above) to:

- (a) other members of us subject to obligations in respect of confidentiality;
- (b) entities who assist us in providing or are involved in our Services (including solicitors, consultants, and the like);
- (c) social media channels on which we have a presence; and
- (d) where we are required or authorised to do so by law.

4.11 Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory data or any other information we require in order for us to provide our Service.

5. How do we protect your Personal Information

5.1 We may store your information in hard copy or electronic format. Information collected by us will be held in an appropriately secure manner, depending on the information and method of collection, including:

- (a) online and offline databases;
- (b) online file servers; and
- (c) locked drawers or filing cabinets.

- 5.2 We will take reasonable steps to help ensure your Personal Information is safe. However, that we cannot guarantee the security of all transmissions or Personal Information, especially where the internet is involved. The transmission and exchange of information is carried out at your own risk.
- 5.3 You acknowledge that we are not liable for the safety of your Personal Information where you provide or allow access to such information by parties other than us.
- 5.4 Notwithstanding the above, we will take reasonable steps to:-
- (a) make sure that the Personal Information we collect, use or disclose is accurate, complete and up to date;
 - (b) protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods;
 - (c) ensure that information is only able to be accessed and used by employees that require the information to provide the Services to you and that access to your information is granted to employees on a 'needs to know' basis.

Attempts to access Personal or Sensitive Information by an unauthorised employee or use by an employee of Personal or Sensitive Information for any other purpose than that which it was collected (except in permitted general situations) is forbidden and may result in disciplinary action;
 - (d) apply both physical and information and communications technology (ICT) security systems to protect personal information;
 - (e) put in place measures to protect against loss, misuse and alteration of electronic information;
 - (f) where necessary, use encryption technology to protect certain information and transactions; and
 - (g) destroy or permanently de-identify Personal Information if it is no longer needed for its purpose of collection.
- 5.5 However, the accuracy of Personal Information depends largely on the information you provide to us, so we recommend that you:
- (a) let us know if there are any errors in your Personal Information; and
 - (b) keep us up-to-date with changes to your Personal Information (such as your name or address).

6. Direct marketing

- 6.1 You expressly consent to us using your Personal Information, including any email address you give to us, to provide you with information and to tell you about our products, Services or events or any other direct marketing activity (including third party products, services, and events) (Direct Marketing Communications) which we consider may be of interest to you.
- 6.2 Without limitation to clause 6.1, if it is within your reasonable expectations that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.
- 6.3 If at any time you do not wish to receive any further Direct Marketing Communications from us, you may ask us not to send you any further information about products and Services and not to disclose your information

to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the email or by contacting our HR Manager.

7. The types of organisations to which we may disclose your Personal Information

- 7.1 We may disclose your Personal Information to organisations outside of us for a purpose directly related to the Primary Purpose of collection detailed in this Privacy Policy. Examples of organisations and/or parties that your Personal Information may be provided to for a purpose directly related to the Primary Purposes of collection detailed in this Privacy Policy includes but is not limited to:
- (a) development, analysis, business and intelligence groups;
 - (b) advertisement providers and sponsors or promoters of any competition that we run;
 - (c) authorised representatives or advisers or when you ask us to do so;
 - (d) third parties who assist us in the provision of our Services and who collect and process data;
 - (e) our employees, potential agents and/or business;
 - (f) anyone to whom we transfer our business (or any part of); and
 - (g) credit reporting agencies, courts, tribunals, regulatory authorities and law enforcement bodies and officers.
- 7.2 Your Personal Information is disclosed to these organisations and/or parties only in relation to the Services we provide to you or for a purpose permitted by this Privacy Policy however we are not responsible for the conduct of third parties with respect to the handling of your Personal Information.

8. Disclosure of information overseas and cross border disclosure

- 8.1 Any Personal Information provided to us may be transferred to, and stored at, a destination outside Australia, including but not limited to Canada, Chile, China, Hong Kong, countries within the European Union, India, Japan, Malaysia, New Zealand, Philippines, Russia, Singapore, South Africa, South Korea, Sri Lanka, Taiwan, the United Kingdom and the United States of America, where we may utilise overseas data and website hosting facilities or where we have entered into contractual arrangements with third party service providers to assist us with providing our Services to you. Personal Information may also be processed by staff or by other third parties operating outside Australia who work for us or for any suppliers, agents, partners or related companies of Next-Gen.
- 8.2 The Act requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your Personal Information outside of Australia do not breach the privacy principles contained within the Act. By providing your consent, under the Act, we are not required to take such steps as may be reasonable in the circumstances.
- 8.3 By submitting your Personal Information to us, you expressly agree and consent to the disclosure, transfer, storing or processing of your Personal Information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information and you may not be able to seek redress in the overseas jurisdiction.
- 8.4 If you do not agree to the transfer of your Personal Information outside Australia, please contact our HR Manager.

9. Access to and correction of your Personal Information

- 9.1 You are entitled to have access to any Personal Information relating to you which we possess, except in some exceptional circumstances provided by law. You are entitled to edit such information unless we are required by law to retain it or permitted to retain it in accordance with this Privacy Policy. However, we may keep track of past transactions for our accounting and audit requirements. Furthermore, it may be impossible to completely delete your information because some information may remain as backups.
- 9.2 If you would like access, or to correct any records of Personal Information we have about you, you are able to access or update that information (subject to the above) by contacting our HR Manager.
- 9.3 We may charge a reasonable fee for giving you access to your information.

10. Vehicle tracking systems and cameras

- 10.1 We use a GPS vehicle tracking system for the purpose of maintaining the safety and security of our company assets, the system is able to locate and track the whereabouts and speed of the vehicle in real time, vehicle history is also available on an interactive map with details on location direction and speed.
- 10.2 The system is able to locate and track the whereabouts and speed of the vehicle in real time, vehicle history is also available on an interactive map with details on location direction and speed.
- 10.3 We use camera systems in some of our vehicles for the purpose of maintaining the safety and security of our employees, users of our Services, visitors and other road users. The format of this camera and recording system is forward facing camera installed in the vehicle which may record, including sound, while the vehicle is in use. In some vehicles there may be a driver facing camera.
- 10.4 We will comply with the Information Privacy Act 2009, the Right to Information Act 2009, Australian Privacy Principles and this Privacy Policy in respect of any information collected through our vehicle camera systems.

11. Links to other websites

- 11.1 Our Website may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any Personal Information which you provide whilst visiting those websites. Those websites are not governed by our Privacy Policy.

12. Consent

- 12.1 By using our Website (as may be applicable), engaging us to perform or using our Services or by accepting the terms of one of our terms and conditions which refer to this Privacy Policy, you are agreeing to the terms of this Privacy Policy.
- 12.2 If you do not agree to the terms and conditions of this Privacy Policy, please do not use our Website and contact our HR Manager.

13. Updates to this policy

- 13.1 In order to take account of new laws and technology, changes to our operations and practices and the changing business environment, this Policy will be reviewed and updated from time to time as is required by the Act and Australian Privacy Principles.
- 13.2 The most current version of our Privacy Policy can be located on our website.

13.3 You can also obtain a copy of our Privacy Policy by contacting our HR Manager at info@doyle.com.au.

14. Privacy related complaints

14.1 If you have any questions about your privacy or privacy-related issues or wish to complain about a breach or suspected breach of your privacy or the handling of your personal information by us, please contact our HR Manager.

14.2 We may ask you to lodge your complaint in writing. Any complaint will be investigated by the HR Manager and you will be notified of the making of a decision in relation to your complaint as soon as is practicable after it has been made, usually within thirty (30) days.

HR Manager:

P: PO Box 5162, Townsville Queensland 4810

E: info@doyle.com.au

T: (07) 4774 4175

www.doyle.com.au

14.3 If we are unable to satisfactorily resolve your concerns about our handling of your personal information, you can contact the Office of the Australian Information Commissioner:

P: GPO Box 5218, Sydney NSW 2001

E: enquiries@oaic.gov.au

T: 1300 363 992

www.oaic.gov.au