

Privacy Policy

Overview

National Intermodal Corporation Limited (**National Intermodal**) is committed to protecting the privacy of individuals.

We understand that your privacy is important to you, and that's why we protect your personal information and aim to be clear and open about what we do with it.

When we collect, hold, use or disclose personal information, we comply with the law including the principles set out in the *Privacy Act 1988* (Cth).

This Privacy Policy applies to National Intermodal and its group.

The Privacy Policy explains:

- how we collect and manage personal information;
- how we protect personal information; and
- how to contact us if you have any queries about National Intermodal's management of your personal information.

The policy applies only to:

- **personal information**, that is information about you and that identifies you, or can be reasonably linked to you; and
- **sensitive information**, which is a subset of personal information, and includes information or an opinion about your racial or ethnic origin; political opinions; religious beliefs or affiliations; philosophical beliefs; political, professional, trade association or trade union memberships; sexual orientation or practices; criminal records or your health, genetic or biometric information and templates.

National Intermodal will only collect sensitive information about you with your consent (unless National Intermodal is otherwise required or authorised by law to do so).

Policy

1. What kinds of personal information does National Intermodal collect and hold?

Generally, the types of personal information National Intermodal collects and holds include:

- name and contact details;
- identification information (such as date of birth, email address, organization and title);
- information you choose to provide to us (such as information in forms submitted to National Intermodal) and enquiry/complaint details;
- information collected in connection with job applications, including information about an applicant's qualifications, experience, character and screening checks;
- details normally and lawfully held by an employer on an employee's personnel file; and
- records of phone, internet and email usage and where undertaken with your consent.

2. How is personal information collected by National Intermodal?

National Intermodal collects personal information in a variety of ways, including when you communicate with us:

- verbally,
- in writing, by telephone, or by email; and
- through National Intermodal's website, including by monitoring and recording communications and interactions.

For security and training purposes, National Intermodal may operate video and audio surveillance devices in its premises, with your consent.

National Intermodal endeavours to collect personal information directly from the individual except where it is not reasonably practical to do so. In some cases, National Intermodal collects personal information from third parties including public sources, information service providers and third parties providing services to National Intermodal.

Where personal information is provided to National Intermodal by a third party, the individual to whom the information relates must provide consent for the personal information to be collected and stored by National Intermodal in accordance with this Privacy Policy. If you provide us with personal information about another person, please make sure that you tell them about this Privacy Policy.

3. For what purposes does National Intermodal collect, hold, use and disclose personal information?

Personal information collected by National Intermodal may be stored in National Intermodal's systems (and those of National Intermodal's IT service provider) and will be used for the following purposes:

- to verify your identity;
- to manage National Intermodal's relationships with our customers, suppliers and contractors;
- for administrative purposes and internal record keeping;
- to protect National Intermodal's lawful interests;
- in connection with suspected fraud, misconduct and unlawful activity under specific Australian legislation (including the *Crimes Act 1914* (Cth), *Customs Act 1901* (Cth) and the Rail Safety National Law);
- in connection with acquisitions or disposals, or potential acquisitions or disposals of its business;
- in connection with your employment or future employment;
- in connection with employees and contractors, training, disciplining, payroll, superannuation, health and safety, administration, insurance (including Workcover) and staff management;
- to respond to your requests or enquiries;
- to gather demographic information about National Intermodal's website visitor trends; and
- to comply with National Intermodal's legal obligations and assist government and law enforcement agencies or regulators.

If National Intermodal is unable to collect personal information from or about you, we may not be able to provide services, respond to your requests or enquiries, or engage in other dealings with you.

4. Disclosure of personal information to third parties

In conducting our business, National Intermodal may disclose your personal information to third parties for the purposes outlined in section 3 above. National Intermodal will only disclose personal information for other purposes with your consent, if the disclosure is required or authorised by law, including in accordance with the Privacy Act.

Third parties that National Intermodal may disclose your personal information to include:

- its related bodies corporate and the Commonwealth of Australia, including National Intermodal's shareholders (Minister for Finance and Minister for Infrastructure, Transport, Regional Development and Local Government);

- its contractors and service providers, such as third party providers of outsourced IT support and corporate and administrative services;
- regulatory bodies for the purposes of seeking any relevant regulatory approvals;
- National Intermodal's insurers and professional advisers;
- the Australian Securities and Investments Commission and other government agencies, as required by law; and
- to anyone as authorised by you.

National Intermodal may also disclose your personal information to recipients in other countries outside Australia, including to IT service providers who handle personal information on our behalf.

National Intermodal will generally only disclose personal information to an overseas entity with agreement, or if we are required or authorised by law to do so. National Intermodal expects such parties to comply with Australian privacy laws.

5. How does National Intermodal protect personal information?

National Intermodal is committed to safeguarding all personal information that it collects and holds.

National Intermodal holds all personal information securely and restricts access to a limited number of employees or contractors (as the context requires) who require access to perform their duties or fulfil National Intermodal's functions. National Intermodal normally requires its contractors to comply with applicable laws which would include the Privacy Act (which incorporates the Australian Privacy Principles).

A range of controls and procedures are in place to protect the privacy and security of personal information that National Intermodal holds, both electronically and physically, from misuse, loss, unauthorised access, modification, or disclosure. However, no internet transmission or technology is ever completely secure or error-free.

Here are some examples of the things we do to protect personal information.

Staff training	We train our staff in how to keep personal information safe and secure.
System security	We have firewalls, intrusion detection and virus scanning tools to help prevent viruses, malware and unauthorised people accessing our systems. When we send electronic data to other organisations, we take steps to keep personal information safe such as using secure networks or encryption.
Service providers	When we use service providers that handle or store data, we require them to take steps to keep personal information safe and use it appropriately.
Building security	We use a mix of secure floor access and other controls to protect our office.

Destroying or de-identifying data when no longer required	We aim to keep personal information only for as long as we need for our business or to comply with the law. When we no longer need information, we take reasonable steps to destroy or de-identify it.
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6. Access to and correction of your personal information

Reasonable steps are taken to ensure that all personal information held by National Intermodal is accurate, complete, and up to date.

Notification should be provided to National Intermodal of a change to personal information or if the information we hold is incorrect or incomplete. Please contact National Intermodal using the contact details at the end of this Privacy Policy if you would like to access or correct the personal information National Intermodal holds about you.

7. Complaints

Please contact National Intermodal using the contact details at the end of this Privacy Policy if you have any concerns or complaints about the manner in which National Intermodal has handled your personal information. National Intermodal may ask you to put your complaint in writing and provide details about it. National Intermodal will endeavour to inquire into your complaint and respond to you in writing within 30 days.

If you are not satisfied with our response, you can contact us to discuss your concerns or lodge a complaint with the Office of the Australian Information Commissioner (www.oaic.gov.au).

8. Loss or unauthorised use of personal information

Despite our efforts to protect your personal information against loss, unauthorised access, modification or disclosure, there remains the possibility that a breach of our security could occur. In the event of actual or suspected loss or unauthorised use of personal information, National Intermodal will:

- seek to rapidly identify and secure the actual or suspected breach to prevent any further breaches;
- engage the appropriate authorities where criminal activity is suspected;
- assess the nature and severity of the breach including the type of personal information involved and the risk of serious harm to affected individuals;
- if appropriate and where possible to do so, notify the affected individuals directly of the breach;
- if appropriate, put a notice on our website advising of the breach; and
- use reasonable efforts to contact you promptly and where required by law or we otherwise consider it appropriate to do so, notify the Office of the Australian Information Commissioner.

9. Review of Privacy Policy

This Privacy Policy will be reviewed every two years and may be reviewed earlier in response to an event or a change in circumstances. National Intermodal reserves the right to modify or amend the Privacy Policy at any time. National Intermodal will notify changes to the Privacy Policy by publishing an updated version on our website.

10. Privacy Officer and Privacy Champion

National Intermodal has appointed the Company Secretary as the 'Privacy Officer' and 'Privacy Champion' as required by the *Privacy (Australian Government Agencies – Governance) APP Code 2017*.

The Privacy Officer is the primary point of contact for privacy matters.

11. Contact details

Company Secretary
National Intermodal Corporation Limited
Suite 21.01, Level 21
200 George Street
Sydney NSW 2000

Email: privacy@nationalintermodal.com.au

Phone: 02 8265 5641

Document Status

Version	Prepared By	Reviewed By	Date Reviewed	Endorsed	Approved
1.0	A. Lowe	A. Lonsdale	September 2013		
2.0	A. Lowe	I. Hunt	February 2014		
3.0	S. McMahon	J. Webster	August 2015	Audit & Risk Committee, meeting held 8 May 2015	Board Meeting held 26 June 2015
4.0	J. Webster	I. Hunt	November 2017	Audit & Risk Committee meeting held on 7 December 2017	Board meeting held on 13 December 2017
5.0	R. Khoury Gebrail	J. Webster	April 2020	Audit & Risk Committee 28 April 2020	Board meeting 28 April 2020
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