

# Privacy and Information Handling Policy

Version 3.2  
9th December 2021

## 1 Recitals

<u>Organisation:</u>	Plumfleet Pty Ltd and Plumfleet Limited [New Zealand] known as 'Plumfleet'
<u>Address:</u>	110 Highett Street, Richmond VIC 3121
<u>Website:</u>	plumfleet.com
<u>ABN / NZBN:</u>	80 168 888 462 / 9429041251331
<u>Scope of Policy:</u>	All Directors [Executive and Non-Executive] and employees of Plumfleet
<u>Operational Date:</u>	8th June 2020
<u>Review:</u>	This Policy will be reviewed at least every three (3) years from the Operational Date

## 2 Introduction

The aim of this Policy is to ensure that Plumfleet's client data is protected and everyone handling personal data is fully aware of the requirements and acts in accordance with the Australian Privacy Principles.

Plumfleet acknowledges and abides by the Australian Privacy Principles, in effect from March 2014, which is an amendment to the Privacy Act 1988.

Plumfleet and our employees will comply with the Australian Privacy Principles.

## 3 Undertakings

Plumfleet ensures that an individual's data will be:

- obtained fairly and lawfully and shall not be processed unless certain conditions are met.
- obtained for a specific and lawful purpose.
- adequate, relevant but not excessive.
- accurate and kept up to date where requested by the individual.
- archived and or deleted as per our client's instructions.
- processed in accordance with the rights of data subjects.
- subject to appropriate security measures.

Plumfleet will:

- Not willingly collect and store sensitive information as defined by the Privacy Act. This data is defined as Highly Sensitive in this Policy.
- Correct information within two (2) business days where we are notified by an authorised customer representative that the information stored is incorrect or out of date.
- Only disclose information about an individual to a third party if we are required to do so by law.

- Ensure that the web application Plumtree is utilising best practice methodology within the hosting platform to protect the data of our customers and their workforce.

Plumfleet Directors and Employees acknowledge that all customer information is confidential and will be treated accordingly. As such, this information will not be disclosed unlawfully.

Plumfleet may collect information relevant to an individual's driving licence information and demerit points and other driving offences. Plumfleet may also store information about an individual's compliance with the relevant fleet and company policies.

## 4 Data Classification

Plumfleet classifies data held into four distinct groups as follows:

**Highly Sensitive:** Data that if breached would have a high impact on customers and their workforce. Typically, this dataset includes credit card details or bank account details. Generally, Plumfleet does not store this data.

**Sensitive:** Data that if breach would have a medium impact on customers and their workforce. An example of this data would be a driver licence record.

**Private:** Data that if breached, would have a low impact on customers and their workforce, for example an email record.

**Public:** Data that if breached, would have a low impact on customers and their workforce, for example, First Name and Last Name.

Plumfleet's web application Plumtree contains some data fields which may be classified as Private or Sensitive, however these fields are not mandatory and can be left blank by a user. An example of this is the Phone Number field.

## 5 Additional Undertakings

The information collected on an individual by Plumfleet will usually be collected and stored by means of the individual willingly uploading the information on to Plumfleet's driver management system, Plumtree. On occasion however, the information may be sent directly to Plumfleet to be uploaded on the relevant system.

Access to Plumtree, is only granted to Plumfleet employees customer administrators where there is a fundamental business and compliance requirement to do so. Plumtree has levels of password protection in place to mitigate any unauthorised system access.

IT Systems and Hardware may be used only for their authorised purposes – that is, to support the on-going business functions of Plumfleet and our customers, suppliers and business partners. The purpose of any IT System as well as the nature and scope of authorised, incidental personal use may vary according to the duties and responsibilities of the user. Appropriate use restrictions extend to users connecting to Plumfleet systems with devices not owned by Plumfleet.