

Privacy and Information Handling Policy

Version 4.0
1 September 2024

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>	1 September, 2024
<u>Review:</u>	This Policy will be reviewed at least every three (3) years from the Operational Date. We may update this policy more regularly. Any changes will be posted on our website, and continued use of our services indicates acceptance of the updated policy.

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. We will also 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. The licence number field in Plumtree is fully encrypted.

5 Payments and Receipts

Plumfleet and our Directors recognise the ongoing risk of electronic funds transfers and therefore we have adopted the following procedure when it comes to receipts and payments:

Prior to transferring or receiving any funds for the first time, Plumfleet staff will:

1. Confirm all names, addresses, sort codes, account names and bank account numbers are checked by a Plumfleet staff member;
2. Ensure there is a written contemporaneous record kept confirming the details held on client or supplier are validated by an authorised representative at the client or supplier's office and that they match with the details in 1;
3. Ensure that after the payment form has been completed, signed and dated another staff member at Plumfleet will then double check the information prior to transferring funds or receiving any funds.

Invoices from Plumfleet are always generated directly from the Plumfleet online accounting system. For the avoidance of doubt, for security reasons we do not email invoices.

6 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.

7 Access and Correction

Individuals have the right to access their personal information and request corrections if it is inaccurate or incomplete. Requests can be made via our help desk at helpdesk@plumfleet.com

8 Disclosure of Personal Information

We do not disclose personal information to third parties without consent, except in the following circumstances:

- To service providers assisting us in our operations
- As required by law
- To protect our rights and property

9 Complaints

If you believe we have not complied with this policy or privacy laws, you may contact us to resolve your concerns. You also have the right to lodge a complaint with the Office of the Australian Information Commissioner.

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