



EQUITY TRANSPORT GROUP

Data Retention & Privacy Policy

At Equity Transport Group (**ETG**) we comply with the Privacy Act 1988 (Cth) (**Privacy Act**). This Policy explains how we manage the personal information that we collect, hold, use and disclose and how to contact us if you have any further queries.

This Privacy Policy applies to you only to the extent that the collection and handling of your personal information by ETG is subject to the Privacy Act.

What is personal information?

Personal information is information or an opinion about an individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, or is recorded in a material form or not. It includes your name, age, gender, contact details, health and race (health and race are also sensitive information). In this Privacy Policy, a reference to personal information includes sensitive information.

Businesses of ETG

ETG owns and operates a number of different businesses that provide ground transportation services including chauffeured cars, limousines and coaches. HUGHES is the flagship brand and has been operating since 1904.

What kind of personal information do we collect and hold?

We will only collect personal information about you by lawful and fair means and not in an unreasonably intrusive manner.

The types of personal information we may collect and hold include contact information (e.g. name, email address and mobile phone number), photographs, employment history, educational qualifications, Commonwealth identifiers (e.g. apprenticeship numbers) and financial information (e.g. credit card details). We may also collect and hold sensitive information including information about your health, race, marital status, medical history and criminal history.

How do we collect personal information?

We may collect personal information from you in a number of ways including face-to-face, over the telephone, through an online form or portal or by email.

We may also collect personal information from list purchases, regional chambers, employers, former employers, referees, contract partners, medical providers, insurers and government agencies. Where we collect your personal information from third parties, we may use that information for a number of reasons including as part of the pre-employment process and to provide you with services and training.

Where practicable, if we have collected your personal information from a third party, we will notify you about the collection.

We collect information from our website including the number of visits, dates of visits, pages viewed and navigation of the site. The purpose of collection is to improve users experience of the site and for record keeping purposes.

We occasionally use third parties to run on-line promotions. We retain information about the number of clicks and impressions of these promotions. This information is anonymous.



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Why do we collect, use and hold your personal information?

We collect, use and hold your personal information as part of the pre-employment process and to provide you with our services, including migration, membership and business training. We also collect, use and hold your personal information to manage our ongoing relationship with you and perform functions and activities relating to our businesses.

Data will be used for the following purposes:

- where authorised by you;
- in a manner you would reasonably expect the use to occur;
- to verify your identity;
- where we are required, authorised or permitted by law;
- for administration of services;
- to comply with laws and regulations including government contracts and training contracts; and
- to provide you with information about our services.

To whom will we disclose your personal information?

- We will not sell your personal information to any third parties.

We may disclose your personal information:

- when specifically authorised by you;
- to professional, medical and insurance advisors;
- to regulatory bodies and government agencies;
- as required by law or court order.

We may disclose personal information for the following purposes:

- reporting to government agencies;
- to obtain professional, medical or insurance advice;
- for urgent health reasons;
- to comply with regulatory or legal requirements;
- credit reporting and checks; and
- to comply with laws or court orders.

Marketing

We may use your personal information to contact you (including by mail, telephone call, text message or email) in relation to our services and offers we have available we think may be of interest to you.

You may opt-out of receiving marketing information from ETG at any time: calling us on 1300 615 165 or emailing us on res@hugheslimousines.com.au

Please note:

Google Analytics remarketing has been implemented in this website.

First-party cookies are used to show relevant advertising to users who have previously visited the website. Visitors can opt-out of the Google Analytics Advertising Features you use by downloading a browser add-on <https://tools.google.com/dlpage/gaoptout/>

What happens if you don't provide us with your personal information?

If you do not provide requested personal information, we may be unable to provide you with our services, or at least not at our usual high standards.



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How do we hold your personal information and manage the data quality and security of your personal information?

- We will take reasonable steps to ensure:
- personal information that we collect, hold, use and disclose is accurate, complete and up to date, relevant and not misleading;
- to protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure by storing it in secure servers and on a secure record management system; and
- where permitted by law, destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Privacy Act.

Do we transfer personal information overseas?

We are unlikely to transfer your personal information overseas. In the event we transfer your personal information outside Australia, we ensure that the service provider or entity complies with all necessary Data Retention & Privacy Policies

Links to other Websites

We are not responsible for the data retention and privacy compliance for any websites from the links that may be on our website.

How we handle complaints

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by ETG, please contact our Data & Privacy Officer via e-mailing manager@equitytransport.com.au

Your concern or complaint will be directed to the appropriate complaint manager who will consider and respond to your complaint within 7 days.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you may contact the Office of the Australian Information Commissioner who may investigate your complaint further.