



## TNT Australia Pty Limited Privacy Policy & Guidelines

### Background to TNT Australia Pty Limited's Privacy Policy and Guidelines

On 21 December 2001 the Privacy (Public Sector) Amendment Act 2000 ("Privacy Act") came into force in Australia to regulate the way in which corporations deal with personal information. TNT Australia Pty Limited ("TNT") is required to comply with the Privacy Act.

TNT has established this Privacy Policy & Guidelines to implement a system for TNT and its staff to manage personal information.

Please feel free to call the TNT Legal Department on (02) 8304 8016 or tie line 628016 if you have any queries or are uncertain of any issues that are contained in this document.

### What is personal information?

"Personal information" is any information that can identify an individual or allow someone to make enquiries to identify an individual. Some examples of personal information such as names, addresses, telephone and fax numbers, email addresses and so on.

The Privacy Act excludes our employees' personal information but does not exclude information on past and prospective employees or any contractors or sub-contractors.

**TNT's Policy based on the Privacy Principles outlined in the Privacy Act is outlined below:**

#### 1. Collection

**TNT may collect personal information needed to fulfil its legitimate functions ("TNT's Functions"). TNT will only collect personal information by lawful and fair means and not in an unreasonably intrusive way.**

We may collect information which is necessary for us to fulfil the TNT Functions, for example, contact names and addresses for the efficient and timely delivery of freight in our express freight, logistics and mail businesses.

We will only collect this information lawfully and during the course of our normal business transactions.

#### 2. Use and Disclosure

**TNT may use and disclose personal information for activities associated with the TNT Functions ("secondary purpose").**

TNT will only collect personal information for a purpose other than for TNT's Functions if:

- (a) the secondary purpose is related to the TNT Functions and if individuals would reasonably expect us to collect that information; or



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- (b) if the individual has consented; or
- (c) if we use that information for direct marketing and it has not been practicable for us to get your consent before using that information.

Usually, we will not use or disclose personal information unless it is part of TNT's Functions. For example, we need to disclose this information to contract drivers or agents when they deliver freight to a contact name and address.

Sometimes, however, we will need to disclose personal information to a third party for a purpose directly related to the TNT Functions. For example, we provide all of our consignment notes to a third party for imaging. In instances such as this, we will ensure that a confidentiality agreement is in place with all of our suppliers and will request an acknowledgment from them that they will comply with the Privacy Act and National Privacy Principles.

In some instances, we will attempt to obtain consent to use or disclose personal information for secondary purposes such as direct marketing activities, however, sometimes this may not be practicable. In these circumstances, we recognise that some customers may not want us to use or disclose their personal information for this purpose and they should be free to inform us of this fact. Once a customer has notified us in writing that they wish to be removed from our direct marketing database, we will remove them from our database as soon as possible.

We recognise that an individual may wish to be removed from our direct marketing database or have his or her personal information deleted from our systems at any time.

### 3. **Data Quality**

**We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date.**

TNT updates much of the information we hold on the request of a customer. We rely heavily upon our customers notifying us when their information changes. However, from time to time we will "wash" our database to ensure the information we hold is correct.

Some information is held on systems that are no longer in use but are still maintained by TNT. We will endeavour to assess these systems periodically and delete old or inaccurate information from these systems where possible.

### 4. **Data Security**

**We will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification, or disclosure.**

We have a secure computer and information management system and will do our utmost to ensure it is safe from unauthorised use. This means disabling access to former employees and having systems in place to protect personal information from unauthorised use.



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We back up all electronic information on a regular basis and keep copies of this information on tapes and disks which are securely held.

Only employees who need access to personal information are authorised to do so.

We will ensure that all existing and new employees are given a copy of our Privacy Policy Statement, these Policy Guidelines and Policy Procedures.

We will provide resources to all our employees to enable them to understand their obligations under the Privacy Act.

We will ask our suppliers or contractors that have access to personal information held by TNT to execute a confidentiality agreement which will contain an acknowledgment that they are fully compliant with the Privacy Act.

TNT's existing policy on lost personal information will apply if such circumstances arise.

**We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.**

TNT updates much of the information we hold on the request of a customer. We rely heavily upon our customers notifying us when their information changes. From time to time we will continue to "wash" our database to ensure the information we hold is correct. We will delete or destroy information that is no longer needed for TNT Functions or secondary purposes.

Some information is held on systems that are no longer used but still maintained by TNT. We will assess these systems periodically and delete old or inaccurate information where possible.

### 5. Openness

**We will maintain a Privacy Policy Statement and these Privacy Guidelines setting out how we will manage personal information.**

We will provide a copy of our Privacy Policy Statement and Privacy Policy Guidelines to anyone who asks for a copy of them.

**If requested, we will take reasonable steps to let any individual know, generally, what sort of personal information we hold, for what purpose, and how we collect, hold, use and disclose that information.**

All requests should be made to us in writing, setting out what the individual would like to know about what personal information we are holding. This request must be referred to Susan Davies, Director Administration, Customer Service and Human Resources. Once she receives this written request, she will arrange to let the individual know, generally what sort



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of personal information we hold, for what purpose and how we collect, hold, use and disclose that information.

We will aim to answer all requests within one month of receipt of the request. However, in some circumstances, it may not be practicable to do so. If this is the case, we will indicate how long it might take us to furnish the request.

TNT may charge a reasonable fee for the provision of this service or may pass on to the individual requesting the information any fee charged to TNT for this service.

### **6. Access and Correction**

**We will provide an individual with access to their personal information upon written request. Exceptions to this are outlined below.**

The exceptions to this are where:

- (a) providing access to the information will threaten the life, health or privacy of another individual;
- (b) the request is frivolous or vexatious;
- (c) the information relates to existing or anticipated legal proceedings between us and the individual and the information would not normally be discoverable;
- (d) providing access would reveal our intentions in negotiations with the individual and might prejudice those negotiations;
- (e) providing access would be unlawful;
- (f) denying access is required by law; or
- (g) providing access could threaten the privacy of other individuals;
- (h) providing access may prejudice a lawful investigation, the enforcement of laws, protection of public revenue or the preparation for court proceedings; or
- (i) if the provision of this information threatens the security of Australia.

Once we receive a written request for access to or copies of personal information held by us, it must be directed to Susan Davies, Director Administration, Customer Service and Human Resources. Susan Davies will then arrange to assess the request, subject to the provisions of the Privacy Act.

Susan Davies will arrange to advise the requesting party what information we are holding and how much, if anything, it will cost to retrieve the information. Any charges for access to or copies of information will not be excessive. We may merely pass on costs charged to us by a supplier. For example, our supplier of imaging services may charge us to retrieve information. In these circumstances, we will pass on this cost to the individual requesting the information.

Once we have provided an individual with access to or copies of their personal information and that individual is able to establish that the information is inaccurate, incomplete or out of date, or they object to it in some other way, we will correct the information. If we disagree



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with the individual about whether the information is accurate or the basis upon which they object to us holding the information, we will try to resolve the matter directly with them.

If we cannot resolve the matter we will refer it to the Privacy Commissioner for a determination.

TNT will give written reasons for our refusal to provide correction or access to the personal information.

### 7. **Identifiers**

**TNT will not require or use any identifying information.**

“Identifying information” includes Medicare numbers, tax file numbers, pension numbers or other identifiers as defined in the Privacy Act. Although TNT does not collect and store identifying information we may transport such information for our customers.

Any identifying information being transported for our customers must be sealed in an envelope or appropriate container by the customer and must not be opened by TNT staff except where it is necessary to facilitate delivery of the consignment. If it is necessary to open the sealed container the TNT staff member must reseal the container and keep the information confidential.

One exception to this policy is where TNT as required by law, may collect the tax file number of contracted staff and pass it on to TNT Group Retirement Fund or the Australian Tax Office.

### 8. **Anonymity**

**Where lawful and practicable, individuals may enter into transactions with us anonymously.**

Where we are able to, we will allow customers to deal with us anonymously. In most cases where we are delivering freight, we will need contact names, addresses and telephone numbers, so often this may not be possible. However, if a potential customer wants a quote and does not want to be identified, we may ask for a written request for a quote on the letterhead of the company requesting the quote and will not need any personal information from that individual.

### 9. **Transborder data flows**

We will not disclose your personal information except as required to perform TNT Functions or if required to do so by any other Commonwealth, State or Territory law.



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### **10. Sensitive information**

TNT does not collect and store any sensitive information but it may transport such information for its customers. Any sensitive information must be sealed in an envelope or appropriate container by the customer and must not be opened by TNT staff except where it is necessary to facilitate delivery of the consignment. If it is necessary to open the sealed container the TNT staff member must reseal the container and keep the information confidential.

If a TNT staff member opens or misplaces, whether accidentally or on purpose, a container of sensitive information this must be reported immediately to the TNT Legal Department.

TNT's existing policy on lost personal information will apply if such circumstances arise.

### **Complaints or disputes to the Privacy Commissioner**

If anyone has a complaint regarding TNT's use of their personal information they must be directed to Susan Davies, Director Administration, Customer Service and Human Resources on (02) 8304 8410.

Susan Davies will attempt to resolve any complaints regarding privacy issues directly with the complainant but if unsuccessful Susan Davies will arrange to refer the complaint to the Privacy Commissioner for a determination.