

1. About this policy

- 1.1 This Privacy Policy (**Policy**) applies to Boom Logistics Limited ABN 28 095 466 961 (**Boom, we, our or us**), and describes how we collect, handle and protect the privacy of your personal information.
- 1.2 Boom is a supplier of specialist lifting solutions and project logistics services to the Australian mining, construction, energy, and infrastructure industries.
- 1.3 We are committed to protecting your privacy and understand the importance of protecting your personal information. This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure, and your rights in relation to your personal information, including how to complain and how we deal with complaints.
- 1.4 We will handle your personal information in accordance with this Policy and applicable privacy laws, including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) under that Act.
- 1.5 In this Policy, **personal information** means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. It does not include information that is de-identified.
- 1.6 We may also collect **sensitive information** about you, which under the Privacy Act includes health information, information about racial or ethnic origin (including Aboriginal or Torres Strait Islander heritage), political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal records, genetic information (that is not otherwise health information), biometric information that is to be used for the purpose of automated biometric verification or biometric identification, and biometric templates. We will only collect sensitive information where it is reasonably necessary for our functions or activities and with your consent, or as otherwise permitted or required by law.
- 1.7 This Policy does not apply to personal information held in employee records where the handling of that information is directly related to a current or former employment relationship between Boom and the employee. A separate policy applies to the handling of that information.
- 1.8 We may update this Policy from time to time to reflect changes in our practices or applicable law. We will publish the updated Policy on our website and will take reasonable steps to draw any material changes to your attention. We encourage you to review this Policy periodically.

2. Types of personal information we collect

- 2.1 The types of personal and sensitive information we collect about you depends on the nature of your dealings with us, and may include the following:
 - (a) in relation to our customers (including sole traders, partners and directors) –
 - (i) full name, business name and ABN or equivalent identifier;
 - (ii) contact details (including email address, telephone number and business address);

- (iii) identification documents (such as driver's licence), where required for credit assessment or compliance purposes;
 - (iv) authorisation details and signatures;
 - (v) financial information (including bank account details, payment history and credit card details);
 - (vi) credit information;
 - (vii) information about the types of products and services acquired;
 - (viii) trade references; and
 - (ix) communications and correspondence records;
- (b) in relation to our suppliers –
- (i) full name, business name, ABN or equivalent identifier;
 - (ii) contact details (including email address, telephone number and business address);
 - (iii) qualifications, licences and certifications;
 - (iv) insurance details;
 - (v) financial information (including banking and payment details); and
 - (vi) other details collected through our Pre-Qualification Supplier Questionnaire;
- (c) in relation to our independent contractors –
- (i) full name, business name (if applicable) and ABN or equivalent identifier;
 - (ii) contact details (including email address, telephone number and business address);
 - (iii) government-related identifiers (including driver's licences, Tax File Numbers and passport copies), where required;
 - (iv) education and employment history, licences and qualifications;
 - (v) financial and credit information (including invoicing, payment and banking details);
 - (vi) identification documents for site access or compliance; and
 - (vii) emergency contact details (full name, relationship to the relevant contractor and contact details);
- (d) in relation to individuals at client companies or service providers –
- (i) name, position, employer or business name;
 - (ii) business contact details; and
 - (iii) correspondence and meeting records;
- (e) in relation to visitors to company sites and offices –
- (i) name and contact details;
 - (ii) identification documents for site access;
 - (iii) health and safety information, where required;
 - (iv) emergency contact details; and

- (v) any personal information incidentally captured through security monitoring systems (including CCTV) operating at our depots and sites.

3. Ways we collect your personal information

3.1 We may collect personal information from or about you in different ways, including:

- (a) from you directly, including when you contact us through our website contact forms, email or telephone; when you submit documentation such as our Application for Commercial Credit or Pre-Qualification Supplier Questionnaire; during ongoing communications relating to service delivery, project coordination, operational briefings and site visits; through credit management and payment processes; through internal systems including access control systems and incident reporting processes; and when you provide instructions or information in the course of receiving our services;
- (b) from third parties, including recruitment and labour hire agencies; referees and background screening providers; regulatory bodies (e.g. for verification of licences or work rights); medical and fitness for work assessment providers; drug and alcohol testing providers; qualification and licence verification services; payroll and superannuation providers; IT, cloud, software and cybersecurity service providers; insurance providers and workers' compensation bodies; legal, accounting and audit service providers; clients and principal contractors providing details of their representatives, contractors or subcontractors; and credit reporting bodies; and
- (c) publicly available sources, including government and regulatory registers (such as the Australian Business Register and ASIC), public business directories and company registers, and publicly available professional profiles, and qualification registers.

3.2 If you apply for a job or contract position with us, we may also collect personal information about you from third parties and publicly available sources, including from:

- (a) recruitment and labour hire agencies;
- (b) government departments to verify your entitlement to work in Australia;
- (c) police agencies or the national criminal records register to obtain your criminal history record;
- (d) referees and background-checking services;
- (e) medical and fitness for work assessment providers;
- (f) payroll and benefits providers; and
- (g) publicly available professional profiles or qualification registers, where relevant and lawful.

3.3 Where it is reasonable and practicable to do so, we will collect personal information directly from you. Where we collect personal information from a third party, we will take reasonable steps to make you aware of the collection.

4. Collection of information via our website

4.1 Our website does not use cookies, web beacons, or similar tracking technologies to collect information about visitors. We operate two self-hosted contact forms on our website through which you may submit enquiries or contact details. Whilst we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit, and the internet protocol address assigned to your computer.

- 4.2** If we receive personal information that we did not solicit, we will, within a reasonable period, determine whether we could have collected the information under the APPs. If we determine that the information is not reasonably necessary for our functions or activities, we will take reasonable steps to destroy or de-identify the information as soon as practicable.

5. How we hold and secure personal information

- 5.1** We hold personal information in a combination of physical records (including locked cabinets and secure rooms at our premises) and electronic records, including locally hosted systems accessed via secure gateways. Personal information may also be archived offsite by third-party storage providers.
- 5.2** We apply a layered set of technical and organisational security controls to protect personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. These controls include strong password protection, data encryption, firewalls and up-to-date virus protection software, technical access restrictions, restricted physical access to premises, access control and identity security, network security, endpoint and device security, monitoring and threat detection, vulnerability and patch management, and backup and recovery systems.
- 5.3** We keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by applicable laws, including taxation laws and other regulatory and record-keeping obligations. We will take reasonable steps to de-identify or destroy personal information that is no longer needed for any purpose for which it may be used or disclosed under the Privacy Act.

6. Purposes for which we collect, use and disclose personal information

- 6.1** We collect your personal information for the following purposes:
- (a)** to provide our services and otherwise conduct our business, including crane hire, rigging, heavy haulage and related operational support;
 - (b)** to verify your identity and authority to act or provide instructions;
 - (c)** to manage customer, supplier, partner and professional relationships and communications;
 - (d)** to issue invoices, process payments, manage accounts and administer billing;
 - (e)** to maintain service, transaction and operational records;
 - (f)** to meet workplace health and safety, taxation, employment and other regulatory requirements and to comply with our legal, record-keeping and audit obligations;
 - (g)** to support workplace health, safety and fitness for work, to conduct incident investigations and to manage emergency situations;
 - (h)** to manage security and access control at our depots and sites;
 - (i)** to prevent fraud and manage risk;
 - (j)** to recruit, onboard and manage contractors and job applicants, including verifying qualifications, references and work rights;
 - (k)** to assess and qualify suppliers for addition to our supplier database; and
 - (l)** to manage IT systems, system access, cybersecurity and operational continuity.

7. Disclosing your personal information

7.1 In the course of conducting our business and providing our services to you, we may disclose your personal information:

- (a) to related entities within the Boom corporate group for legitimate business purposes, operational efficiency, shared services and governance purposes;
- (b) to recruitment and labour hire agencies;
- (c) to background screening providers (e.g. criminal history checks, right-to-work verification);
- (d) to payroll and superannuation providers;
- (e) to IT, cloud hosting, software vendors and cybersecurity service providers;
- (f) to health and medical service providers (e.g. fitness for work assessments, drug and alcohol testing providers);
- (g) to our professional advisers, including lawyers, auditors and accountants;
- (h) to insurance providers and workers' compensation bodies;
- (i) to clients and principal contractors (where required for site access, compliance, or service delivery);
- (j) to government agencies and regulators (e.g. taxation, workplace safety, or employment compliance authorities);
- (k) to credit reporting bodies;
- (l) to third parties authorised or nominated by you;
- (m) to anyone to whom part or all of our assets or businesses are transferred or sold; and
- (n) where required or authorised by law.

7.2 All disclosures are limited to what is reasonably necessary for the relevant purpose and are managed in accordance with our obligations under the Privacy Act.

8. Direct marketing

8.1 We do not send direct marketing communications to the public.

8.2 We do not share personal information with any external organisations or third parties for the purposes of direct marketing.

9. Overseas disclosures

9.1 We do not generally disclose personal information to overseas recipients. Our systems are hosted locally in Australia.

9.2 If our practices change in the future such that personal information is likely to be disclosed to overseas recipients, we will update this Policy to reflect those practices and, where practicable, specify the countries in which such recipients are likely to be located.

10. Dealing with us anonymously or using a pseudonym

- 10.1** Due to the nature of our services and our obligations under workplace health and safety, employment and other applicable laws, we are generally required to verify the identity of individuals in all material dealings. Accordingly, it is generally not practicable for us to deal with individuals anonymously or under a pseudonym. However, if you make a general enquiry via our website or by telephone without submitting personal information, you may do so without identifying yourself.

11. Access and correction of your personal information

- 11.1** We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete.
- 11.2** You may request access to, or correction of, the personal information we hold about you at any time by contacting us using the details set out in the 'Contact Us' section at paragraph 13 below.
- 11.3** Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time and usually within 30 days. We will not charge you for making a request. However, in some circumstances, we may charge a reasonable fee to cover the administrative costs of providing access (such as retrieval, photocopying, and postage). Any such fee will not be excessive, and we will notify you of the estimated cost before proceeding. If we refuse your request for access, we will provide you with written reasons for the refusal and information about how you may complain about the decision.

12. Complaints

- 12.1** You can make a complaint in writing to us using the details set out in the 'Contact Us' section at paragraph 13 below. We will respond to you within 30 days to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.
- 12.2** If you are not satisfied with our response, or if we fail to respond within 30 days, you may escalate your complaint to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, www.oaic.gov.au.

13. Contact us

- 13.1** If you have any questions about this Policy or how we handle your personal information, or otherwise wish to contact us, please do so at:

Privacy Officer

Email:

privacy@boomlogistics.com.au

Postal address:

Boom Logistics Ltd, Kings Business Park, Suite 6, Level 3, 100 Dorcas Street,
Southbank VIC 3006