

Privacy Policy

Trans International, an independent franchise of SIRVA Pty Ltd, are committed to the protection of your Personal Information and Sensitive Information in accordance with the Australian Privacy Principles (**APPs**) set out in the Privacy Act 1988 (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (**Privacy Act**).

This Privacy Policy describes the manner in which Trans International collects, holds and uses Personal Information and Sensitive Information that is covered by the Privacy Act. It is not intended to cover categories of Personal Information or Sensitive Information that are not covered by the Privacy Act. If you wish to make any inquiries regarding this Privacy Policy, you should contact Trans International in any of the ways specified in clause 13.

Trans International may, from time to time, review and update this Privacy Policy including to take into account new laws, regulations and technology. All Personal Information and Sensitive Information held by Trans International will be governed by our most recent Privacy Policy, posted on our website (www.transinternational.com.au) (**Website**). Our most recent Privacy Policy will apply to our collection, use and disclosure of Personal Information and Sensitive Information.

What is the difference between "Personal Information" and "Sensitive Information"?

"Personal Information" is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in a material form or not.

"Sensitive Information" includes an individual's health information, genetic information, biometric information or templates, or personal information that is also information or an opinion about an individual's race or ethnicity, their religious, political or philosophical beliefs, opinions or affiliations, their sexual orientation or criminal record.

What information do we collect and hold?

The types of Personal Information and Sensitive Information that is covered by the Privacy Act that Trans International may collect or hold are set out in clauses 2.1 and 2.2. Trans International may collect and hold your Personal Information or your Sensitive Information or a combination of both. This Privacy Policy deals with how Trans International handles either your Personal Information or your Sensitive Information or a combination of both, (collectively the Protected Information).

2.1 Personal Information

Trans International may collect and hold Personal Information such as your name, gender, date of birth, contact details (including your address, phone numbers and emails, whether personal or for work, current or historical), family details (including Personal Information of family members), citizenship details, employment details (whether current or historical), education details, passport, travel or visa details (whether current or historical), financial information, payment details, bank account details, tax file number and/or services information and preferences.

2.2 Sensitive Information.

Trans International may collect and hold Sensitive Information such as your health information (including mental health information and medical history, whether current or historical, general or in relation to specific conditions), your criminal record (including any probation or parole orders, imprisonment or involvement in the commission of any criminal offences), character information (including outstanding debts, national security information, deportation or detention information) or your ethnic origin.

Why do we collect Protected Information?

3.1 Trans International collects Protected Information from clients (whether individuals or employer entities), employees, contractors, agents, and other individuals that is reasonably necessary for one or more of our functions or activities, including: in order to allow us to conduct our business functions, to meet any regulatory requirements which apply to our business, to market and sell our services and to conduct employee related activities.

3.2 You have the option to deal with us anonymously or by using a pseudonym. However you acknowledge that where this is impractical (for example when you contract with us) or where the law or a court order provides otherwise we are not required to provide these options to you.

3.3 If you choose not to provide your Personal Information to Trans International, we may not be able to undertake certain activities for you such as providing you with requested information or services.

When and how do we collect Protected Information?

4.1 Trans International collects Protected Information when you: visit our Website, supply or buy services, request information about us or our services, provide feedback, respond to a survey, change your content or email preferences, contract with us, fill in a form on our Website, or contact us by telephone, facsimile, email, post or in person.

4.2 Trans International may also collect Protected Information about you via third parties including from our suppliers, agents and government agencies.

4.3 In some circumstances we may receive Protected Information that we have not requested. If this occurs, we will comply with our obligations under the Privacy Act. You acknowledge that we may de-identify and/or destroy this information unless we are required to keep it by law.

Information collected via our Website

Trans International will not collect any Protected Information about users of our Website except when they knowingly provide it or as otherwise described below. For example, Trans International may collect Protected Information from users of the Website when they:

- complete an online form;
- complete a survey; and/or
- otherwise correspond with Trans International .

Cookies

5.2 Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns.

5.3 Cookies are used on our external websites for security purposes. We do not use cookies to collect information relating to website visiting patterns. If you access our Website, a cookie is downloaded onto your computer's hard drive when you first log on to our Website. You can adjust your internet browser to disable cookies, however Trans International may not be able to provide you with all the service or functionality you require on our Website if you choose to do so.

Web Beacons

5.4 Web beacons are images that originate from a third party site to track visitor activities. Trans International may use web beacons to collect aggregate data and provides this information to our Website host to administer and improve the performance of our Website.

Advertising

5.5 We use Google and/or other third-party service providers to serve ads on our behalf across the Internet and sometimes on our Website. They may collect anonymous information about your visits to our Website (not including your name, address, email address or telephone number), and your interaction with our services. They may also use information about your visits to the Website and other websites to target advertisements for goods and services in order to provide more relevant advertisements about goods and services of interest to you.

How Trans International uses the Protected Information it collects about you?

6.1 Trans International uses the Protected Information it collects about you for our business functions and activities, which may include the following purposes:

- to provide you with information or services you have requested;
- to promote and market our services to you;
- to personalise and customise your experiences on our Website;
- to help Trans International research the needs of its clients;
- to conduct research for the purposes of improving existing services, creating new services or marketing our services;
- to provide you with ongoing information about Trans International and its activities;
- to allow us to provide third party information and offers in which we believe you may be interested;
- to comply with regulatory or other legal requirements;
- for purposes related to the employment of our personnel and providing internal services to our staff; and
- for any other purpose communicated to you at the time that the Protected Information was collected or for which you provided your consent.

6.2 Trans International may use your Protected Information for a secondary purpose if that secondary purpose is related to those purposes in clause 6.1, if we have your consent or if otherwise provided for under the Privacy Act.

6.3 Trans International may use your Protected Information to provide you with direct marketing materials if you would reasonably expect us to or if you consent to receive direct marketing materials. We will seek your consent to provide you with direct marketing materials if we have obtained your Protected Information from a third party. Direct marketing material may include promotional material about Trans International or the services offered by Trans International.

6.4 You may opt out of receiving direct marketing material by contacting us in any of the ways specified in the direct marketing materials or as set out in clause 13.

6.5 Generally, we will only collect and use your Protected Information in accordance with this Privacy Policy. In the event that we collect or use Protected Information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with the Privacy Act.

Who do we disclose your Protected Information to?

7.1 Depending on the nature of your relationship with Trans International, we may disclose your Protected Information to shareholders, officers and employees of Trans International, other businesses within our group of companies, service providers who assist us in our business operations (including third party service providers based overseas), government agencies, parties involved in the purchase or sale of any of our businesses, other third parties (including parties that are connected with or involved in our relationship with you), or otherwise as required by law.

7.2 Trans International may also disclose your Protected Information to our Website host or service providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner. To the extent that we do share your Protected Information with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this Privacy Policy.

7.3 We may also share non-personal, de-identified and aggregated information for research or promotional purposes, in connection with providing requested information or services to you, or for the purpose of improving our services. We will not sell your Protected Information to third parties for marketing purposes.

7.4 Unless otherwise specified in this Privacy Policy, Trans International or Trans International's Website host will not disclose any of your Protected Information to any other organisation unless the disclosure is required by law or is otherwise permitted by the Privacy Act.

Disclosure of your Protected Information overseas

8.1 Your Protected Information may be disclosed outside of Australia to an entity in a foreign country, including entities in which Trans International has an ownership interest or third party service providers (Overseas Entities). The countries where your Protected Information may be disclosed will depend on the nature of our relationship with you, including whether we are responding to your enquiries, information requests or application for our services and the countries that these relate to. You can request a list of countries where your Protected Information is likely to be disclosed by contacting Trans International in any of the ways set out in clause 13.

8.2 It is possible that Overseas Entities to which we disclose your Protected Information may be subject to foreign laws that do not provide the same level of protection of information as in Australia. Overseas Entities may not be subject to any privacy obligations in some countries and they may be required or compelled to disclose your Protected Information to a third party such as overseas authority. You may not be able to seek redress in the overseas jurisdiction against the Overseas Entity.

8.3 By providing us with your protected information, you acknowledge and consent to us sharing your protected information to overseas entities for the purposes set out above, and you consent to us making multiple disclosures to an overseas entity for the same purpose as that initial disclosure. If you do not consent to us disclosing your protected information to Overseas Entities we may not be able to provide you with the requested services.

8.4 If you consent to us disclosing your Protected Information to an Overseas Entity and that Overseas Entity breaches the APPs, we will not be accountable for that breach under the Privacy Act and you will not be able to seek redress in respect of that breach under the Privacy Act.

Storage and security of Protected Information held by Trans International

9.1 Trans International will take reasonable steps to protect your Protected Information from misuse, interference and loss and from unauthorised access, modification or disclosure.

9.2 Trans International aims to keep your Protected Information secure and up to date. We will comply with our obligations under the Privacy Act in relation to any Protected Information that we handle, including information which is held on Trans International's computer systems.

9.3 Protected Information that is held by Trans International in hard copy is stored securely (whether on its premises or in offsite secure storage facilities) and is only disclosed or used for the purposes described in this Privacy Policy.

Updating and correcting your Protected Information

We will take reasonable steps to ensure that the Protected Information that we hold is accurate, up-to-date and complete. You can update your Protected Information at any time by contacting Trans International in any of the ways specified in clause 13. Trans International welcomes any changes to your Protected Information so as to keep our records up to date.

How long will Trans International keep your Protected Information?

11.1 We will keep your Protected Information only for as long as required for our business purposes and otherwise as required by Australian law.

11.2 Where we no longer need to keep your Protected Information in accordance with clause 11.1, we will take reasonable steps to destroy or de-identify your Protected Information.

11.3 If you wish to have your Protected Information destroyed or de-identified, please let us know and we will take reasonable steps to do so (unless we need to keep it for legal, auditing or internal risk management reasons).

Finding out what Protected Information Trans International holds about you

12.1 You are entitled to access Protected Information that Trans International holds about you. If you request access to your Protected Information, we will grant your request unless providing you with access would unreasonably impact upon the privacy of others or is not otherwise permitted under the Australian Privacy Principles or at law. If we refuse your request to access your Protected Information, we will provide you with written reasons for the refusal.

12.2 A request for access can be made by contacting Trans International in any of the ways specified in clause 13.

How to contact us and more information

13.1 If you feel that your privacy has not been respected or that Trans International has conducted itself inconsistently with this Privacy Policy, the Australian Privacy Principles, a registered APP Code and/or the Privacy Act in respect of your Protected Information, or for any other queries, problems, complaints or communication in relation to this Privacy Policy, please contact us in any of the following ways:

email: privacyofficer@sirva.com.au

write to: Att: Privacy Officer

202-228 Greens Road, Dandenong South, Victoria 3175 Australia

Privacy Collections Notice

Survey Client – Request for information/ application for services

Trans International, an independent franchise of SIRVA Pty Ltd may collect and use your personal and sensitive information collectively known as protected information to respond to your enquiries, requests or applications for our services, and to provide you with requested information or services. If you choose not to provide us with your information we may not be able to provide you with requested information or services.



We may allow your protected information to be shared with our related entities, government agencies or third party service providers based overseas. When we provide your protected information overseas we do so in connection with providing you with requested information or services or as required or authorised under Australian law.

It is possible that the overseas entities which we share your protected information with may not be subject to foreign laws that provide the same level of protection of information as in Australia or may not be subject to any privacy obligations. Overseas entities may be required or compelled to disclose your protected information to a third party such as overseas authority. You may not be able to seek redress in the overseas jurisdiction against the overseas entity. If you consent to us disclosing your protected information to an overseas entity and that overseas entity breaches the Australian Privacy Principles (APPs), we will not be accountable for that breach under the Privacy Act and you will not be able to seek redress in respect of that breach under the Privacy Act.

By providing us with your protected information, you acknowledge and consent to us sharing your protected information to overseas entities for the purposes set out above, and you consent to us making multiple disclosures to an overseas entity for the same purpose as that initial disclosure. If you do not consent to us disclosing your protected information to Overseas Entities we may not be able to provide you with the requested services.

Our Privacy Policy, posted on our website (www.transinternational.com.au), further explains how we collect, use and disclose protected information and how you can access, correct or complain about the handling of your protected information.

Privacy Survey Notice

Survey Respondents

Trans International, an independent franchise of SIRVA Pty Ltd collect and use your personal and sensitive information collectively known as protected information to respond to your enquiries, requests or applications for our services, and to provide you with requested information or services. If you choose not to provide us with your information we may not be able to provide you with requested information or services. Trans International conducts surveys for research or promotional purposes, in connection with providing requested information or services to you and for the purpose of improving existing services, creating new services or marketing its services. Your feedback and protected information may be used for research, marketing or reporting purposes.

We may allow your protected information to be shared with our related entities or third party service providers based overseas. When we provide your protected information overseas we do so in connection with providing you with requested information or services or as required or authorised under Australian law.

Our Privacy Policy, posted on our website (www.transinternational.com.au), further explains how we collect, use and disclose protected information and how you can access, correct or complain about the handling of your protected information.