

# Privacy Policy

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## Scope

This Policy applies to all DP World Australia employees, agents, contractors and anyone else permitted into the work environment for the reason of conducting work for the company.

This Policy applies to any location which is attended for the purposes of performing work, work-related duties, training or conferences and any work social functions.

## Introduction

DP World Australia Limited (ACN 129 842 093) is a company registered in Australia. DP World Australia Limited and its related bodies corporate in Australia (collectively **DPWA**, we or us) are bound by the Privacy Act 1988 (Cth) (**Act**), including the Australian Privacy Principles (**APPs**).

To enable DPWA to operate its stevedoring and logistics business, we may collect personal information. In summary, 'personal information' is information (or an opinion) relating to an individual that can be used to identify that individual. We are committed to protecting the personal information that we handle in connection with our services.

This policy sets out how:

- a) we collect personal information;
- b) we store, use, process and disclose personal information; and
- c) you may access and, if necessary, correct any record containing your personal information.

This policy also includes our '**Credit Reporting Policy**' and details additional information on how we manage personal information collected in connection with a credit application.

This policy also includes information which will be relevant if you are based in the European Economic Area (**EEA**) during your interactions with us.

By interacting with DPWA in any of the circumstances described in this policy, you acknowledge the terms of this policy and you consent to the collection, use, disclosure and storage of your personal information as set out in this policy.

DPWA may amend this policy from time to time by publishing it on [www.dpworldaustralia.com.au](http://www.dpworldaustralia.com.au) (**Website**). We encourage you to check the Website periodically to ensure that you are aware of our current privacy policy.

## How does DPWA collect personal information?

We may collect personal information directly from you when you:

- a) use the Website or any Website application we provide (**Application**), including the Customer Portal;
- b) contact us, whether by telephone, email, mail, in person or via social media;
- c) apply for consumer credit as part of the provision of our services to you, or act as a guarantor in connection with any such application;
- d) apply for employment at DPWA;
- e) attend seminars or other events hosted by DPWA;
- f) are entered onto our mailing lists to receive publications and other marketing emails;
- g) are DPWA alumni; or
- h) otherwise interact with DPWA during the ordinary course of business or when we provide services to you.

There may be occasions when we collect personal information about you from a third party, such as the organisation you work for, regulatory authorities, credit-reporting bodies and referees. We may also collect information about you from publicly available sources of information. We may combine the personal information that we collect and hold about you.

You are not under a legal obligation to provide us with any personal information. However, if you withhold your personal information, we may be unable to provide our services to you or to otherwise interact with you.

## What types of personal information does DPWA collect?

The types of personal information we collect will depend on the nature and purpose of our interactions with you. Such information may include (but is not limited to) the following:

- a) **identification information** – such as name, address, date of birth, driver's licence number or passport number;
- b) **employment information** – such as names of current and previous employers, job title and right to work;
- c) **health and medical information** (where permitted) – such as pre-employment medical checks, the results of drug and alcohol testing for employees, and information relating to any safety incidents that occur at our premises such as workers compensation related documents;
- d) **financial information** - such as billing address, tax file number, bank account details;
- e) **feedback and opinions** – such as the information you submit through our enquiry or contact forms regarding queries or complaints;
- f) **your location and internet activity** – when you interact with us through our Website or an Application and via cookies, we may collect information such as your server address, internet protocol (IP) address, domain name, browser type and version, time zone setting and information about your visit to the Website, including the date, time, nature and duration of your visit; and
- g) **credit-related personal information** – including the types of information referred to in the credit reporting policy, below.

The Website also uses cookies to distinguish you from other users. A cookie is a small text file that will be stored on your browser or computer hard-drive. They are used to help navigate the Website efficiently and to perform certain functions. For detailed information on the cookies we use and the purposes for which we use them, please click here to see our Website Terms of Use:

<https://www.dpworldaustralia.com.au/dp-world-australia-disclaimer/>

## How does DPWA use personal information?

We will use your personal information only if we are permitted by law to do so. We may use your personal information for the following non-exhaustive list of purposes:

- a) to provide services to you as a customer, including to verify your identity, to communicate with you about your booking or account and to process payments;
- b) to enable us to comply with our obligations to you as an employee or contractor of DPWA, including to pay you;
- c) to receive goods and services from you as a supplier or service provider;
- d) to allow you to participate in any interactive features you choose to enable on the Website or in an Application;
- e) for marketing purposes, such as to distribute our newsletters and other marketing communications to you, if you have elected to receive them;
- f) to maintain our own accounts and records;
- g) to enable us to monitor the performance and relevance of the Website and to attempt to keep the Website safe and secure;
- h) to undertake third party screening checks, including checks relating to your vocational suitability or creditworthiness; and
- i) where we need to comply with a legal or regulatory obligation, including in relation to customs and security matters and to safety incidents.

If we wish to use your personal information for any purpose incompatible with those described in this policy, we will, where required, provide you with appropriate information and request your consent prior to commencing any such additional use.

If you receive marketing material relating to our services by email or post, you may withdraw your consent for us to send these to you at any time, by using the "unsubscribe" option included in the material.

## How does DPWA disclose personal information?

We may disclose your personal information to third parties including:

- a) between ourselves i.e. between DP World Australia Limited and its related bodies corporate in Australia, its parent group and shareholders overseas;
- b) to service providers engaged by DPWA, including in respect of professional advisory services (including legal, audit and accounting), insurance, IT support, research, banks, data processing and security;
- c) to credit reporting bodies in connection with any application for customer credit (namely, ApplyEasy, via <https://applyeasy.com.au/home>);
- d) to contractors who carry out services for us or for our customers on our behalf; and
- e) to regulatory authorities, courts, tribunals, government agencies and any other external bodies to whom we are obliged to provide information.

These third parties are permitted to use your personal information only to the extent necessary to enable them to provide their services to us. Where we provide your personal information to third parties acting on our behalf (e.g. IT system providers), we will ensure that such third parties are subject to written contractual undertakings to handle the personal information solely for that purpose and to have in place appropriate measures to protect such information. For the purposes of the General Data Protection Regulation (Regulation EU 2016/679) (**GDPR**) and our EEA Users referred to below, these third parties are 'Data Processors'.

## Credit Reporting Policy

Where we provide services to you on credit (that is, where payment of our services is deferred for 7 days or more), we are a '**credit provider**' for the purposes of the Act. Our handling of credit information is regulated by the Act and the Privacy (**Credit Reporting**) Code (known as the '**CR Code**').

In deciding whether to provide credit to you, DPWA may collect and hold various types of credit-related information about an individual, which is personal information that has a bearing on credit that has been provided to you or which you have applied for or if you act as a guarantor. Credit information includes but is not limited to:

- a) identification information such as name, gender, address (including prior addresses), date of birth driver's licence and passport details;
- b) details of an individual's current and prior employers;
- c) confirmation of previous information requests made to credit reporting bodies (**CRBs**) by other credit providers;
- d) details of previous or current credit applications, including the amount and type of credit sought;
- e) details of current and previous credit arrangements, including the name of any credit provider and certain terms and conditions relating to such credit;
- f) repayment history information and payment information;
- g) personal insolvency information, including information about an individual that is recorded on the National Personal Insolvency Index;
- h) new arrangement information in relation to prepayments, such as new terms or new payment arrangements due to default;
- i) opinions of credit providers, including DPWA, that an individual has committed a serious credit infringement/s (e.g. fraud);
- j) information about court proceedings relating to your credit and solvency;
- k) information received from CRBs and other credit providers, which may include information that has a bearing on an individual's credit worthiness, and which may be used in establishing the individual's eligibility for consumer credit; and
- l) any credit score or credit risk assessment indicating a CRB's analysis of your eligibility for consumer credit. (collectively **credit-related personal information**).

DPWA may use credit-related personal information for a range of purposes, including to:

- a) assess the eligibility of an application for credit received from an actual or prospective customer;
- b) assess an application of an individual to act as Guarantor for an actual or prospective customer;
- c) manage and review any credit provided to a customer; and
- d) collect any payments owed to us in connection with the provision of credit.

In addition to the third parties identified above, we may disclose your credit-related information to guarantors of your credit, insurers, to third parties who provide credit-related services to us, such as CRBs or debt collectors, and to any third parties to whom we assign your debt.

The following sections of this policy outline how we hold credit-related personal information, how you may access or seek the correction of such credit-related personal information, how you may complain about matters relating to your credit-related personal information, and how we will handle that complaint.

## How does DPWA hold and keep secure your personal information?

We hold your personal information in a combination of hard copy and electronic files, at our own premises and with the assistance of third party data storage providers. This may include the holding of personal information in locations outside of Australia as set out in this policy.

DPWA is required by law to safeguard the security and privacy of your personal information, including by taking reasonable steps to protect any such information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. The steps we take depend on the nature of the personal information being stored, the purpose for which it is stored, and the medium in which it is stored. The measures we take may include confidentiality requirements and training for employees, document storage policies, security measures to control access to our systems and premises, and electronic security systems such as passwords and data encryption.

## Sharing personal information outside of Australia

Although DPWA operates in Australia, some of the organisations with whom we may need to share your personal information (including credit-related information) may be located outside of Australia, such as Dubai, the location of our parent company's Global Head Office, or Sri Lanka, where our IT Service Desk is located.

We may store personal information in cloud-based data hosting facilities or in other networked or electronic systems that are only accessible with an internet connection. This may result in personal

information being transferred to, and stored at, a destination outside of Australia including, but not limited to Sri Lanka and Dubai.

It is not always practicable to know the country in which your information may be held when it is stored in this manner. However, if we send or store personal information overseas, we take reasonable steps to ensure the overseas recipient complies with applicable data protection and privacy laws. This may include entering into an enforceable contractual arrangement with the overseas recipient requiring the recipient to handle the personal information in accordance with, or in a manner otherwise consistent with, the Act and the APPs. It may also include a review of the overseas recipient's technical and organisational safeguards against the loss or misuse of personal information to ensure they are generally consistent with the requirements of the APPs. In the case of EEA Users, we take the additional measures referred to below.

## General Data Protection Regulation

In the course of interacting with and providing services to our customers based in the EEA (**EEA Users**) or monitoring the use of our Website or Applications by EEA Users, we collect and handle personal information of EEA Users.

The collection, use, disclosure and processing of personal information of EEA Users is governed by the GDPR. The GDPR was introduced on 25 May 2018 and regulates the processing of personal information under EEA law. The GDPR aims to protect the information relating to individuals in the EEA and harmonise data protection laws across EEA Member States.

For the purpose of the GDPR, '**Processing**' encompasses collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. DPWA is the '**Data Controller**' of all personal information obtained by us from you as described in this policy. If we handle your personal information (or '**personal data**', as it is referred to in the GDPR), you are a 'Data Subject'. This means you have certain rights under the GDPR as to how your personal information is processed. Some of those rights are listed in the section below.

When we transfer or collect the personal information of an EEA User from inside the EEA to any country outside of the EEA whose data protection laws are not considered by the European Union Commission (**EU Commission**) to provide essentially equivalent protections to the GDPR (e.g. Australia), we will take appropriate measures to safeguard such information. These measures may include ensuring that the recipient is bound by enforceable contractual undertakings to protect any personal information being transferred, such as the EU Commission-approved model contractual clauses.

## Accessing your personal information and your other rights

You may take the following action in respect of your personal information. Please note that these rights are not absolute, and may be subject to certain exemptions specified by law:

- a) **Right to be informed** – This policy, together with our Website Terms of Use fulfils our obligation under the Act and the GDPR to inform you of the ways in which we collect and handle your personal information.
- b) **Right of access and to data portability** - You may obtain access to personal information we hold about you, subject to any exceptions permitted by law. In certain limited circumstances, you may also ask us to transfer your personal information to another organisation.
- c) **Right to rectification or erasure** – We rely on the personal information, including the credit-related information, that we receive to conduct our business. We take reasonable steps to make sure that any such information collected, used or disclosed by us is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held. You may ask us to correct the personal information we hold about you. If we have previously disclosed that information to a third party and you request us to give the third party notice of the correction, we will take reasonable steps to do so. You may also ask us to delete personal information about you where you can demonstrate that we no longer need the information, or if you withdraw the consent upon which our use of the information is based, or if you feel that we are unlawfully processing your information.
- d) **Right to restriction of processing** - You may request that we refrain from or suspend processing your personal information in a number of circumstances, including where you contest its accuracy or where you consider the processing is unlawful.

- e) **Right to object** - You may object to our processing of your personal information, including where the basis of the processing is our legitimate interests such as direct marketing and profiling.
- f) **Right to Withdraw Consent** - You may withdraw your consent for us to process your personal information where the processing is based on consent.
- g) **Right of Complaint** - If you consider that DPWA has breached this policy or any applicable laws relating to data protection and privacy, you may make a complaint.

If you wish to exercise any of these rights, please contact us on the details below.

## How do you contact DPWA or make a complaint?

If you have a query or complaint regarding the collection or handling of your personal information, or if you wish to exercise any of the rights set out above, please contact us using the details below. We are committed to answering your query or resolving your complaint promptly.

### Within Australia:

Post: Attn: The Privacy Officer  
 DP World Australia  
 Level 40, MLC Centre  
 19 Martin Place  
 Sydney NSW 2000

Email: [privacy@dpworld.com.au](mailto:privacy@dpworld.com.au)

Telephone: +61 (0)2 9270 8800

If you are not satisfied with our response, you may escalate your concern by contacting the Office of the Australian Information Commissioner:

Online: [www.oaic.gov.au](http://www.oaic.gov.au)

Telephone: 1300 363 992.

### Within the EU:

Attn: Mantrraj Budhdev  
 Head of Legal, Europe & Russia

Email: [mantrraj.budhdev@dpworld.com](mailto:mantrraj.budhdev@dpworld.com)

Telephone: +44 20 7901 4150

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