



Privacy Policy

Current Date of Issue: 1 October 2026

Table of Contents

1. Purpose.....	2
2. Application of Policy	2
3. What is Personal Information	2
3.1 Kinds of personal information SeaRoad collects and holds	3
3.2 How SeaRoad collects and holds personal information	4
3.3 Credit Information	5
3.4 Cookies.....	5
3.5 Purposes for which SeaRoad collects personal information.....	6
3.6 Security and Protection.....	7
3.7 Overseas transfers of personal information.....	7
4. Use and Disclosure of Personal Information	7
5. Prospective Employees	9
5.1 Information Collected.....	9
5.2 Unsuccessful Applications.....	10
5.3 Security of Personal Information	Error! Bookmark not defined.
6. Employees.....	10
6.1 Information Collected.....	10
6.2 How long will personal information be kept	10
7. Automated Decision-Making	11
8. Third-party links	11
9. Social media platforms	12
10. Availability of this Policy and Amendments to Policy.....	12
11. Implementation of this Policy	12
12. Integrity of Personal Information, Enquiries and Complaints.....	12
12.1 Accuracy and Currency	12
12.2 Complaints	12
12.3 Access to and correction of personal information	13
13. Contact Details	14

Policy Title:	Privacy Policy
Current Date of Issue:	1 October 2026
Responsible Department:	Chief Operating Officer
Approved By:	Board of Directors
Introduction Date:	12 March 2014
Version Number:	4
Date of Next Review:	1 October 2028

1. Purpose

The SeaRoad group comprising SeaRoad Holdings Pty Ltd, SeaRoad Shipping Pty Ltd and SeaRoad Logistics Pty Ltd (**SeaRoad**) is committed to complying with the privacy laws of Australia.

In Australia, these are set out in the *Privacy Act 1988* (the **Act**) which contains the Australian Privacy Principles (**APPs**), and in relevant privacy codes. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au.

SeaRoad understands that personal information may only be used by SeaRoad in accordance with the Act and the APPs.

2. Application of Policy

This Privacy Policy (other than section 6) explains how SeaRoad manages personal information about individuals, including employees, provided that where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

Section 6 includes certain matters that are specifically relevant to the position of employees. This Policy does not form part of any employee's contract of employment.

3. What is Personal Information

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) Whether the information or opinion is true or not; and
- b) Whether the information or opinion is recorded in a material form or not (i.e., digitally, or hard copy).

Sensitive information is a special category of personal information and includes information or an opinion about a person's health, race, or ethnic origin, political or religious beliefs,

membership of a trade union or association, criminal record, sexual orientation, and genetic and 'biometric' information.

SeaRoad will only collect a person's sensitive information where it is reasonably necessary for one or more of SeaRoad's functions or activities and with the person's consent, unless a relevant exception applies.

3.1 Kinds of personal information SeaRoad collects and holds

The kinds of personal information that SeaRoad collects will depend upon the dealings the relevant individual may have with SeaRoad. SeaRoad may collect and hold information about:

- Purchasers or potential purchasers of SeaRoad's products and services (for example, in the ordinary course of dealings, in relation to credit applications and sales and marketing and promotional activities);
- Suppliers (for example, when establishing records and systems to enable payment for goods or services);
- Job applicants and employees (for the purposes of employment);
- Individuals as contractors (for example, when establishing records and systems to enable payment for services); and
- Other individuals who may come into contact with SeaRoad in the ordinary course of business.

The kinds of personal information SeaRoad collects may include, but are not limited to:

- information that identifies the individual (for example, name, address, phone number, email or other contact details);
- information about the individual's financial position (creditworthiness);
- billing information;
- where the individual is an employee or prospective employee or contractor, their date of birth, tax file number, employment history, references, educational qualifications, dependants, driver's licence, passport details, residency, visa status, feedback from supervisors, training records and logs of usage of SeaRoad equipment (e.g., phones, computers and vehicles);
- records of an individual's image and/or voice through the use of Closed-Circuit Television (CCTV) systems for the purposes of managing the security of SeaRoad premises and vessels and health and safety of occupants and the public generally;
- if you call SeaRoad via telephone, SeaRoad may monitor and, in some cases, record such telephone conversations for staff training, quality assurance and record-keeping purposes;
- the individual's opinion about SeaRoad's products, services, or staff; and
- any other information which may identify an individual in connection with their employment or engagement or possible employment or engagement by SeaRoad.

The kinds of sensitive information SeaRoad collects may include, but are not limited to:

- information about the individual's dietary requirements;
- information about the individual's religious beliefs;
- information about the individual's disability (for example, accessibility and other needs and limitations) or injuries that may occur on our premises / vessels;
- biometric information; and
- health information, such as details of medical conditions or prescription medication, the results of an individual's fitness for work medical and/or drug and alcohol testing, where this is relevant to the individual's role and engagement with SeaRoad or to the safety and wellbeing of the individual and others in connection with their work with SeaRoad; and
- criminal record information that an individual discloses to us about themselves, or which is contained in the results of any police check or other background or security clearance checks (for example, where the individual has applied for a role with SeaRoad and has disclosed that information to us as part of their application, or otherwise agreed to a police check or other background of security clearance check).

In addition to the types of personal information identified above, SeaRoad may collect personal information as otherwise permitted or required by law.

Where an individual does not wish to provide SeaRoad with their personal information or sensitive information, SeaRoad may not be able to properly respond to the request or query or provide the requested services if that information is reasonably necessary for SeaRoad to respond to the request or provide the services.

3.2 How SeaRoad collects and holds personal information

Whenever it is reasonable and practical to do so, SeaRoad will only collect personal information directly from an individual (unless a relevant exception under the Act applies).

Some of the common ways SeaRoad may receive personal information directly from an individual include:

- when an individual (either on their own behalf or for and on behalf of an organisation (i.e. their employer)) makes an inquiry or order in relation to SeaRoad's services, including via its websites, or enters into contracts with SeaRoad for its services;
- in administering and performing any contracts with service providers;
- when an individual applies for a role with SeaRoad;
- from correspondence (whether in writing or electronically) or when an individual contacts SeaRoad via telephone, e-mail or other means;
- when an individual attends our premises or vessels (e.g. via attendance logs and or surveillance systems); and
- in the course of managing SeaRoad's business.

However, in certain cases SeaRoad may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, your employers, contractors, our clients, business partners, referees, government bodies (e.g. police checks, if required), academic and professional bodies (e.g. to validate details and currency of qualifications).

SeaRoad will take reasonable steps to inform an individual before, or at the time it collects personal information or, if this is not practicable, as soon as practicable after collection, that it has obtained their personal information, unless it is obvious from the circumstances of its collection (for example, exchanging business cards at a trade function) or SeaRoad has taken other reasonable steps to ensure the individual is otherwise aware.

To the extent lawful and practicable, SeaRoad will provide individuals with the option of not identifying themselves or of using a pseudonym when dealing with SeaRoad.

3.3 Credit Information

SeaRoad may obtain information that has a bearing on:

- an individual's eligibility to be provided with credit; or
- their history in relation to credit; or
- their capacity to repay credit (all, 'credit information')

directly from an individual or from a Credit Reporting Body in connection with an application for commercial credit or provision of a guarantee relating to such an application.

SeaRoad will only do so where an individual has consented to the disclosure of that information.

Where SeaRoad obtains such credit information, it will only use that information for the credit guarantee purpose or internal management purposes of SeaRoad that are directly related to the provision or management of any credit by it or for debt collection purposes.

SeaRoad will take such steps (if any) as are reasonable in the circumstances to ensure that the credit information it collects is accurate, up to date and complete. When it no longer needs it for the purpose for which it was collected, SeaRoad will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.

The rights of individuals to access that information are set out below. Otherwise, the provisions of this policy as they relate to personal information will generally also apply to credit information in relation to an individual.

3.4 Cookies and Web Trackers

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. Tracking pixels, tags and web beacons are small pieces of code or

invisible images that allow us, or third parties acting on our behalf, to understand how you interact with our websites, emails, advertisements and online content.

SeaRoad uses cookies and other tracking technologies such as tracking pixels, tags and web beacons (collectively, **Web Trackers**) on our websites to collect various information about how you interact with our websites. We use this information for various functions, such as to identify specific devices in order to collect aggregate information on how visitors are experiencing our booking website and to adapt and tailor how visitors experience the website.

Information collected via cookies and other Web Trackers may include internet protocol (IP) address, device information, browser information, and details on your usage. While cookies and Web Trackers allow a computer or device to be identified, they do not (in and of themselves) permit any reference to a specific individual.

Our websites may provide you with certain options on whether to accept or disable certain Web Trackers. We encourage you to review and utilise these options. Your browser or device may provide you with the option to disable or opt-out of some of these cookies and Web Trackers.

SeaRoad may use third party vendors to show our ads on other sites and apps on the Internet and serve these ads based on information about your prior visits to our websites and other internet activity that has been collected using Web Trackers. SeaRoad may also use analytics data supplied by these vendors to inform and optimise its ad campaigns based on information regarding your prior visits to our websites that has been collected using Web Trackers.

To the extent that any data collected via Web Trackers constitutes your personal information under the Privacy Act, we will handle such information and data in accordance with this Privacy Policy and any applicable requirements under the Privacy Act.

3.5 Purposes for which SeaRoad collects, uses, handles and discloses personal information

SeaRoad collects personal information which is reasonably necessary for its dealings with the relevant individual in the course of SeaRoad's business. SeaRoad may also collect personal information if the relevant individual consents or where SeaRoad is otherwise permitted or required by the Act or other laws to do so.

This Privacy Policy explains the main purposes for which SeaRoad usually collects, handles, uses and discloses personal information in the ordinary course of its operations.

SeaRoad may, in connection with particular dealings with you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy.

In the event of any inconsistency between the provisions of this Privacy Policy and those other disclosures, the other disclosures will apply. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

3.6 Storage, security and Protection

SeaRoad holds personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

SeaRoad utilises reasonable technical and organisational security measures to protect the sensitive and personal information that SeaRoad holds against unauthorised misuse, interference and loss and from unauthorised access, modification or disclosure. Without limiting the foregoing, SeaRoad implements a range of security controls to protect the personal information it holds, including by implementing IT security tools to protect its electronic databases.

SeaRoad will also destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law. SeaRoad may need to retain records containing personal information to comply with record keeping obligations, and for other legitimate business purposes (such as audits, quality assurance and litigation).

3.7 Overseas transfers of personal information

Some of the third parties to whom SeaRoad discloses personal information may be located outside Australia. The countries in which such third-party recipients are located depend on the circumstances. In the ordinary course of business, we commonly disclose personal information to recipients located in Germany and the United States of America.

Whenever SeaRoad transfers or discloses personal information outside of Australia, it will do so in accordance with the requirements of applicable privacy and data protection laws and the Act. SeaRoad may disclose personal information to overseas recipients without an individual's consent where permitted by the Act (and, in such circumstances, it will comply with the other applicable requirements of the Act in doing so).

From time to time, we may also engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider.

4. Use and Disclosure of Personal Information

As a general rule, SeaRoad only uses and discloses personal information:

- for the purposes for which it was collected (and for sufficiently related purposes for which the individual would reasonably expect it to be used);
- for other purposes to which the relevant individual has consented; and
- as otherwise authorised or required by law.

SeaRoad may provide you with information and advertisements about products, services and promotions either from SeaRoad, or from third parties which may be of interest to you, where:

- you have asked SeaRoad to do so (or have otherwise consented to SeaRoad doing so);
- or

- SeaRoad is otherwise permitted by law to do so.

If you would like SeaRoad to stop sending you direct marketing communications, please contact us (see section 13 below).

The purposes for which SeaRoad uses and discloses personal information will depend on the circumstances in which it was collected. Some of the specific purposes for which SeaRoad collects, holds, uses and discloses personal information are for the purposes of:

- Providing products or services that have been requested;
- Operating and providing SeaRoad's websites;
- Receiving goods and services from suppliers and service providers;
- Processing payments in connection with products or services that we have provided or will provide;
- Assessing the creditworthiness of customers and prospective customers;
- Helping SeaRoad manage and enhance its products and services, including analysing customer feedback and future customer needs;
- Providing ongoing information about SeaRoad's products and services to individuals that SeaRoad believes may be interested;
- Complying with regulatory and legal obligations;
- Recruiting employees and engaging contractors;
- Assessing suitability for employment or engagement, or work at a particular location;
- Probity and reference checking;
- Immigration and related checking;
- Facilitating medical checks;
- Arranging training and personal development;
- Facilitating security arrangements;
- Complying with risk management processes;
- Complying with legal obligations;
- Establishing access to and use of information technology systems;
- Administering payroll and vendor payment systems;
- Facilitating and completing travel and secondment arrangements;
- Processing expense reports for reimbursement purposes;
- Management reporting;
- Audit purposes;
- Obtaining legal and accounting advice;
- Transferring employees between group companies;
- Outsourcing or in-sourcing services;
- Ensuring compliance with other policies and protecting the security, health and safety of SeaRoad's premises, vessels, facilities, personnel and visitors; and
- To contact or communicate with the individuals to whom the personal information relates (including in connection with the abovementioned purposes).

SeaRoad may disclose personal information to third parties in connection with the purposes described above. This may include disclosing personal information to the following types of third parties:

- to SeaRoad's suppliers, contractors and organisations that provide it with technical and support services or who manage some of SeaRoad's business functions;
- to other SeaRoad companies or related entities;
- to SeaRoad's accountants, insurers, lawyers, auditors and other professional advisers;
- to any third parties to whom the relevant individual has directed or permitted SeaRoad to disclose their personal information (e.g. referees);
- in the unlikely event that SeaRoad or its assets may be acquired or considered for acquisition by a third party, that third party and its advisors; and
- debt collection agencies.

In emergency or disaster situations, SeaRoad may disclose personal information to relevant government authorities and support services (including the Red Cross) as permitted under the Privacy Act.

SeaRoad may also disclose an individual's personal information in accordance with any consent given by the individual or where disclosure is authorised, compelled or permitted by law.

Where the third party is handling the personal information on SeaRoad's behalf, SeaRoad uses reasonable endeavours, consistent with industry practices, to require such third parties to keep the disclosed information confidential and secure and to comply with applicable privacy laws in its dealings with such information.

5. Prospective Employees

5.1 Information Collected

SeaRoad collects personal information from job applicants and candidates in the recruitment process. (See section 6 below for further details of the types of information collected).

SeaRoad may also collect personal information about job applicants and candidates via police checks and other security and background checks. This information may include sensitive information about the individual, such as criminal record information.

SeaRoad is required or authorised by law to conduct security and background checks on individuals who are applying for particular types of roles with SeaRoad. For example, individuals applying for positions that constitute "critical workers" under the *Security of Critical Infrastructure Act 2018* (Cth) and SeaRoad's associated Critical Infrastructure Risk Management Program must complete background checks with AusCheck. SeaRoad will provide details of the required police and background checks (based on the relevant role) at or around the time that you make your application.

A failure by an applicant to provide any lawfully requested information may result in the processing of the application being delayed or may result in the application being unsuccessful.

Any information which is provided by a job applicant which is later found to be false may result in the person's application being unsuccessful (or, if the person is employed, it may result in disciplinary action which may include the termination of that person's employment).

5.2 Unsuccessful Applications

If a job applicant applies for a job and their application is unsuccessful, SeaRoad may retain the application for the purpose of considering the applicant for positions within SeaRoad when they arise. In that case, SeaRoad will treat the personal information in the application in accordance with this Privacy Policy.

Unsolicited information will be destroyed or de-identified unless SeaRoad could have validly solicited it and kept it in accordance with the Act. In the case of unsolicited CVs, SeaRoad will consider whether it could have validly collected the information and, if so, may retain these for the purpose of considering applicants for positions within the company when they arise. In that case, SeaRoad will treat unsolicited CVs in accordance with this Privacy Policy.

6. Employees

6.1 Information Collected

SeaRoad collects information in relation to employees as part of their job application (as described in section 5 above) and during the course of their employment, either from the employee directly or, in some cases, from third parties such as recruitment agencies, referees, government bodies (e.g. police checks and security / background checks, if required) and academic and professional bodies (e.g. to validate details and currency of qualifications). The information SeaRoad collects may include contact details, qualifications, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors and training records.

SeaRoad may also collect details of disabilities, allergies and health issues that may impact the employee's role, or which arise in the performance of the employee's duties, so that SeaRoad can accommodate and otherwise assist the employee with any such health requirements or incidents. This may include collection of the results of an employee's fitness for work medical, where this is relevant to their role with SeaRoad.

We collect camera/video footage of employees while on our premises or vessels (via CCTV). Under the Act, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. SeaRoad handles employee information in accordance with legal requirements and its applicable policies in force from time to time.

6.2 How long will personal information be kept

Generally, SeaRoad will keep employee records for seven years or as required by law.

7. AI and Automated Decision-Making

Like most businesses, SeaRoad also uses artificial intelligence (**AI**) systems to assist in running SeaRoad's business and conducting day-to-day activities (including for the purposes described in this Privacy Policy and any other privacy notices provided to individuals).

Where these activities involve an individual's personal information (including as described in this Privacy Policy), SeaRoad may use AI systems to process the individual's personal information to assist with those activities. Some of these AI systems are provided by third party service providers, and SeaRoad's use of such AI systems may involve the disclosure of the personal information to that third party service provider, and other persons involved in that AI system (including the developers, owners or providers of the AI system).

SeaRoad may use AI and other types of automated decision-making technologies to make, or assist us to make, decisions about (or involving) you. This may include:

- assisting SeaRoad to screen applications for employment, including deciding whether or not SeaRoad will offer applicants an interview or employment, by analysing various kinds of personal information provided during the application process (such as details of the applicant's qualifications and experience and responses to questions relating to the specific role) and applying that information against certain threshold questions and assessment criteria SeaRoad has set;
- assessing creditworthiness of prospective customers, including by deciding whether to accept a prospective customer, whether to grant credit to that customer and terms on which such credit will be granted, by analysing various kinds of personal information provided during the application process and applying that information against certain threshold questions and assessment criteria SeaRoad has set;
- managing security access to SeaRoad premises and vessels, including by making decisions about whether to admit an individual onto (or permit an individual to remain on) premises or vessels, and decisions about whether an individual or their conduct has given rise to a safety or security risk (and how to manage such risks), by analysing information collected through monitoring technologies; and
- monitoring compliance with workplace policies, including by making decisions about the identification and investigation of potential misconduct, by analysing information collected through camera/video footage of employees, feedback from supervisors, training records and logs of usage of SeaRoad equipment (e.g., phones, computers and vehicles).

The kinds of personal information used by the AI Systems and automated decision-making technologies may include, but are not limited to, the kinds of personal information described in this Privacy Policy.

8. Third-party links

SeaRoad's website, located at <https://searoadholdings.com.au/>, may contain links to other websites operated by third parties. We make no representations or warranties in relation to privacy practices of any third party website and we are not responsible for the privacy policies or

the content of any third party website. Third party websites are responsible for informing you about their own privacy practices and procedures.

9. Social media platforms

We use social media platforms such as Facebook and LinkedIn to communicate with the public about our services and businesses. We may collect the information that you choose to share with us through these platforms, including photos, videos and comments and posts.

These social media platforms have their own privacy policies, and may handle your information for their own purposes. You can access the privacy policies for Facebook and LinkedIn on their websites.

If you choose to use these social media platforms to communicate with us, please be mindful that certain pages within these platforms may be publicly available. We encourage you to use the privacy settings available on each platform. If you would like to contact us directly, you can do so using the contact details in section 13.

10. Availability of this Policy and Amendments to Policy

This Policy may change from time to time and is available on our website - www.searoadholdings.com.au. If you do not have access to the Internet, SeaRoad will send you a copy upon request.

SeaRoad reserves the right to change the terms of this Privacy Policy from time to time. An up-to-date copy of the Privacy Policy is available via our website - www.searoadholdings.com.au.

11. Implementation of this Policy

SeaRoad will ensure that appropriate training is provided to employees in relation to implementation of this policy and the procedure set out in this policy will be integrated into SeaRoad's risk management procedures.

12. Integrity of Personal Information, Enquiries and Complaints

12.1 Accuracy and Currency

SeaRoad will take such steps as are reasonable to ensure that personal information it collects, uses or discloses is accurate, up-to-date, and complete. If an individual's contact or other details change, please contact us (see section 13).

12.2 Complaints

If an individual has a complaint about SeaRoad's privacy practices, including if they believe that SeaRoad has breached the APPs, the individual should contact SeaRoad's Compliance Officer (see section 13 below).

SeaRoad takes all complaints seriously and will respond to an individual's complaint in accordance with any applicable timeframes imposed by law and otherwise within a reasonable period. If an individual makes a complaint, SeaRoad requests that the individual provides us with any relevant information that SeaRoad may reasonably request to consider the complaint.

SeaRoad's usual process is to appoint a staff member to review the complaint, gather relevant facts and documents, discuss with relevant parties, and then decide what steps (if any) are appropriate for SeaRoad to take in response to the complaint. In seeking to resolve the complaint SeaRoad will first consider whether there are any simple or immediate steps which can be taken to address the concern.

If the complaint requires more detailed consideration or investigation, SeaRoad will generally contact the individual to provide an initial acknowledgement that it has received the complaint and is investigating it, and SeaRoad may ask the individual to provide further information about the complaint and the outcome they are seeking.

Once SeaRoad has completed its consideration and investigation of the complaint, SeaRoad will then contact the individual to inform them of SeaRoad's decision.

If the individual is dissatisfied with the handling of the complaint, they may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

12.3 Access to and correction of personal information

Subject to any agreed or lawful exceptions, an individual has a right to:

- Access a copy of their personal information which is held by SeaRoad; and
- Correct any incorrect information held by SeaRoad about the individual.

If you wish to access or correct your Personal Information, please contact us in writing (see section 13).

If an individual requests access to the personal information SeaRoad holds about them, or requests that SeaRoad change that personal information, SeaRoad will respond within a reasonable period. In some circumstances the law may require or permit SeaRoad to refuse the request. The law may also permit SeaRoad to provide access or correction in a manner that is different from the one that the individual initially requested. In such cases SeaRoad will usually discuss this with the individual when responding to the request.

SeaRoad will not charge an individual any fee for making an access request, but may charge an administrative fee for the costs required to find and provide a copy of the individual's Personal Information if the access request is granted. SeaRoad will generally discuss these costs with the individual beforehand and seek their approval before proceeding to action the request.

In order to protect the security of Personal Information that it holds, SeaRoad may require identification from an individual who makes an access request before releasing the requested information.

If SeaRoad is satisfied that the personal information is incorrect, SeaRoad will take steps to correct that information in accordance with SeaRoad's obligations under the Act.

SeaRoad is not obliged to make a correction to the personal information that SeaRoad holds about an individual if SeaRoad doesn't agree that it requires correction (for example, if SeaRoad doesn't agree that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading).

If SeaRoad refuses to provide access to, or correct, personal information as requested by an individual, it will explain its decision to the applicant and advise them of mechanisms available to them to complain about that refusal.

The APPs set out some grounds upon which SeaRoad may refuse to provide an individual access to (or correction of) their personal information.

13. Contact Details

SeaRoad Compliance Officer contact details:

Position Title: Chief Financial Officer

Telephone: 1300 768 111

Email: safetyandpeople@searoad.net