



EASTLINK PRIVACY POLICY

16 January 2018

PURPOSE

ConnectEast Pty Ltd and its controlled entities (**EastLink, we or us**) respect the privacy of our customers and other individuals (**you**) about whom we collect personal information in the course of our business. This Policy outlines our commitment to protect the privacy of customers' personal information.

We comply with all relevant privacy laws, including requirements applicable to us under the Privacy Act 1988 (Cth) and the Australian Privacy Principles, EastLink Project Act (Vic), Road Safety Act (Vic) and Australian Standard 4721-200: Personal privacy practices for the electronic tolling industry.

This Policy sets out, in general terms, how we manage personal information, including generally, the kinds of personal information we may collect, the purposes for which we may collect and how we hold, use and disclose personal information.

By using our products or services or providing personal information to us, you agree to the terms of this Policy.

WHAT PERSONAL INFORMATION DO WE COLLECT

Personal information is information or an opinion about you.

The personal information we collect about you may include your name, date of birth, address, telephone number, email address, driver licence number, vehicle details, your EastLink PIN, username or password, bank account and debit/credit card details, credit history, toll road travel history including images and video footage of people and vehicles on toll roads, information on your use of the EastLink website collected using cookies, and information we collect as part of a survey, customer feedback request or a competition in which you participate.

If you choose not to give certain personal information to us, we may not be able to provide you with the services or the level of service you require.

Occasionally, you may need to give us additional personal information or information about other individuals such as family members or other individuals authorised to act on your behalf. Please tell

those individuals that you are giving us their personal information and direct them to a copy of this Policy.

Subject to this Policy, we do not collect sensitive personal information (such as information about anyone's health, racial or ethnic origin, political opinions, religious beliefs or affiliations or trade union membership) except with the person's consent.

If you are being considered for a job with us, we may collect information about your working history, qualifications, skills, character and relevant records and screening checks (e.g. background, competency, financial probity, identity, psychometric assessments, eligibility to work, vocational suitability and criminal record checks). As necessary and where appropriate, we may require prospective staff to undergo certain medical checks.

In addition, we may collect information about staff members' training, terms and conditions, staff benefits, emergency contact details, performance, conduct, use of our IT and communications resources, payroll matters, leave and tax/financial affairs. We collect this information to train and manage our workforce and meet our legal obligations. Some of the personal information we collect is considered 'sensitive information' under certain privacy laws. For example, sensitive information we collect may include:

- > health information (e.g. in connection with road incidents, impact of construction work, sick leave or medical checks on job applicants and staff); and
- > criminal record (e.g. police checks on job applicants and staff).

Subject to privacy laws, we may sometimes collect sensitive information about you from a third party who holds sensitive information about you. If you think we have received your sensitive information in error, please contact the privacy officer using the details below.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect most personal information directly from you - for example, when you provide information to us by phone, email, in an application for one of our products or through our websites or when you use EastLink.

We may also collect personal information about you from third parties. For example, we may collect personal information from:

- > public sources, such as telephone directories, the electoral roll or other websites;
- > credit reporting agencies, if we request a report about your credit history;
- > other Australian toll road operators, who provide us with information about travel on their toll road by our accountholders;
- > government vehicle registration authorities, who provide us with personal information about motorists who travel on EastLink without a tolling product;
- > recruitment consultants, your previous employers and others including educational institutions, professional and trade associations, referees and publicly available sources, that may be able to provide information to us, to assist us in our decision on whether or not to make you an offer of employment or engage you under a contract;

- > marketing companies, if we acquire contact information to tell you about EastLink and our products that may interest you;
- > our agents and payment channels, who may sell our products to you or collect payments from you; and
- > your authorised representatives.

We may also collect information when you use EastLink through safety and traffic management cameras, incident detection systems, vehicle registration detection systems, electronic toll collection systems and the tag attached to your vehicle.

Our websites

Our websites may use “cookies” to track your website usage, to remember your preferences and for other site administration purposes. You may be able to disable cookies through your internet browser. However, if you do so, you may not be able to access certain areas of our websites or enjoy the improved website experience that cookies offer.

Our websites may also detect and use your internet protocol (IP) address or domain name for site administration purposes. No personal information is collected. Rather, the tracking of usage patterns of visitors to our websites helps us to monitor and improve the content and performance of our websites.

Our websites may contain links to other websites managed by other organisations. We are not responsible for the content or privacy practices of other websites, nor liable for the use of other websites. You should read any privacy policy and terms of use of any other website before using it.

Our telephone systems

We may record and monitor telephone calls between you and us for training, service quality control and compliance processes.

HOW WE USE YOUR PERSONAL INFORMATION

We collect your personal information to allow us to perform our business functions and activities. These may include:

- > for the purposes for which it was collected;
- > administering and managing our products and services provided to you, including calculating and collecting tolls, fees and charges prescribed by law or otherwise payable for our products and services;
- > administering and managing products and services provided to you by other toll road operators, if you choose to use an EastLink product to pay for those products or services (for example, using a tag provided by us for travel on another operator’s toll road or vice versa – using another toll road operator’s tag or other customer arrangement for travel on EastLink);
- > verifying your identity;
- > conducting relevant and appropriate checks for creditworthiness and fraud;
- > undertaking traffic planning and vehicle management services;

- > conducting market research and research regarding traffic conditions;
- > meeting our obligations and performing our functions under applicable laws and agreements;
- > preventing or investigating any fraud or crime (or suspected fraud or crime);
- > investigating or pursuing any legal claim that we may have against you;
- > responding to your queries;
- > notifying you of changes to our tolls, fees, charges, agreements, products or services;
- > maintaining, developing and testing our business systems;
- > for road safety purposes; and
- > as otherwise required or authorised by law.

We also use personal information to provide you with information relating to EastLink, our products and services and related special offers from our business partners. We provide you with an option to unsubscribe from this service. You can opt-out of receiving this information by “unsubscribing” in our marketing communications, on an application form or by contacting us using the details set out in this Policy.

Where appropriate, we may handle personal information relying on exemptions that are available under applicable privacy laws, including, for example, the employee records exemption in the Privacy Act and provisions in the Privacy Act concerning the sharing of personal information among related bodies corporate.

Providing your personal information to others

For the purposes described in this Policy, we may disclose personal information:

- > subject to any restrictions imposed by any relevant legislation, among ConnectEast's related entities;
- > under information sharing arrangements with the operators of other Australian toll roads;
- > to our consultants, contractors, suppliers, service providers, professional advisers and agents, including:
 - > mailhouse and email distribution organisations
 - > contractors that provide payment channel services for our products, accounts and invoices
 - > towing, roadside support and maintenance and logistics contractors
 - > debt collection and credit reporting companies
 - > legal and accounting service providers
 - > call centre operators
 - > recruitment, payroll, superannuation, staff benefits, surveillance and training providers
 - > information technology suppliers that provide support, maintenance and upgrade services for our systems;
- > to direct marketing contractors;
- > to government agencies and any entity responsible for the collection of tolls or the taking of enforcement action concerning use of EastLink;
- > to anyone to whom any part of our assets or business is transferred;
- > where an individual to whom the personal information relates has otherwise consented; and

- > as required by relevant laws and regulations (such as in response to a subpoena, warrant or request from a government law enforcement agency or under laws and regulations relating to the operation of EastLink).

We may disclose information to research institutions and traffic management authorities (among others) for statistical or research purposes, but will only do so once the information has been de-identified and de-linked from any personal information.

In order to protect your debit/credit card information we implement tokenisation. This involves disclosing your debit/credit card data to a bank or other financial institution, who will securely store that information on our behalf, and assist with processing any authorised transactions.

If a vehicle registered in your name is linked to an EastLink account, we may disclose information about trips your vehicle makes across our roads to the account holder.

If your vehicle is involved in or in the vicinity of a road incident, we may disclose your personal information to emergency services, insurance providers and towing, roadside support and maintenance and logistics contractors. This information may include images and video footage of the incident and the vehicles involved, as well as the details of any vehicles and occupants. A “road incident” also includes property and road damage caused by your vehicle. Examples of where we may disclose your personal information in a road incident include:

- > where you are involved in a vehicle collision;
- > where your vehicle is within the vicinity of a collision, and may be captured in video footage or images;
- > where your vehicle causes property or road damage; or
- > where you are in a vehicle that causes property or road damage.

Information disclosed to overseas organisations

We may need to disclose your personal information to organisations located overseas. These organisations are service providers that may perform a range of technology, operational and customer service functions for us. They may be located in South-East Asia, the USA and Europe.

When we disclose information overseas, we take commercially reasonable steps to ensure your information is treated in accordance with the standards that apply in Australia.

Other than those third parties referred to above, we will not disclose your personal information to any other third party unless it has reasonable grounds to believe:

- > you have authorised us to do so;
- > your safety, or the safety of others in the community, is at risk; or
- > we are required or permitted by law to do so.

We use reasonably appropriate safeguards and security measures to ensure personal information we hold about you is protected from risks such as misuse, interference, unauthorised access, modification or disclosure. Personal information is only retained for as long as is necessary for the identified purposes or as required by law. We will comply with the notifiable data breach requirements, as applicable.

MANAGING YOUR PERSONAL INFORMATION

Keeping information accurate and up to date

We take all reasonable steps to ensure that the personal information we hold is accurate, complete, up-to-date, relevant and not misleading. However, the accuracy of the information we hold depends on the accuracy of the information provided to us by you and others. Please help us to keep our records up to date by informing us of changes to your name, contact details or other personal information.

Protecting your information

We protect your personal information from misuse, unauthorised access or disclosure and loss.

We maintain a number of physical and electronic measures to protect personal information. We restrict access to our electronic databases, maintain firewalls and encrypt certain data where practicable to do so. However, we cannot guarantee the security of information provided via electronic means.

You can help us protect your privacy by observing our security requirements and contacting us if your personal information changes. You should keep your EastLink PIN and passwords confidential and secure from disclosure to other people.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you inquire about our products and services you do not need to provide your personal details.

ACCESSING AND CORRECTING YOUR INFORMATION

We will give you full access to the personal information we hold about you unless there is a legal or administrative reason why this is not possible. For example, we may not give you access if doing so would affect the privacy of another person. If we do not give you access to any part of the personal information we hold about you, we will tell you why.

If you believe any personal information we hold about you is incorrect, you may ask us to correct such information. We will take reasonable steps to ensure the information is corrected. If we refuse to change your personal information we will tell you why.

We will need to take reasonable steps to verify your identity before providing you with access to personal information or responding to a request to correct information. We can provide access to or correct most personal information over the telephone, but we may require you to make your access or correction request in writing in some cases.

HOW TO CONTACT US

For further information about EastLink's privacy policies or practices or to update your personal information, please visit the EastLink website at www.eastlink.com.au or contact us on (03) 9955 1400 during business hours. Our full contact details are listed at www.eastlink.com.au/enquiries.

Please contact us if you have any concern about the way we have handled your personal information so that we can address your concern as soon as possible.

COMPLAINTS

If you have any complaints about our treatment of your personal information, please contact our Privacy Officer (contact details below). We take your concerns seriously and will respond to complaints as soon as possible.

Contact details Email: privacyofficer@connecteast.com.au
Phone: (03) 9955 1700 during business hours
Post: Privacy Officer, ConnectEast Pty Ltd, PO Box 812, Ringwood VIC 3134

If you are not satisfied with our resolution of your concern or complaint, you can contact the TCO Tolling Customer Ombudsman by phone on 1800 145 009. Visit www.tollingombudsman.com.au for more details.

You can also contact the Office of the Australian Information Commissioner. Details about how to do so are available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

CHANGES TO OUR PRIVACY POLICY

If we change our privacy policy, we will post the new privacy policy on our website and will take reasonable steps to notify you of the change (in most cases, by posting a notice on our website stating that a change has occurred).

All personal information collected and held by us will be governed by our most recent Privacy Policy, as posted on our website. We encourage you to check our website regularly and to read any updates posted there.