

Company Policy-Pol 3046 Privacy & Confidentiality

August 2020

PURPOSE:

To provide a framework for CITO Transport employees to ensure individuals privacy is maintained and the confidential handling of all business information.

SCOPE:

This policy applies to all activities and staff of CITO Transport and specifically extends to work related activities and actions that may occur outside of usual work hours, or after ceasing employment with CITO Transport, and/or that may involve non-CITO Transport owned equipment/property.

OBJECTIVES:

The aim of this policy is to:

1. Establish CITO's Privacy Policy;
2. Ensure Employee Confidentiality; and
3. Notify employees of electronic monitoring of workplaces;

PRIVACY POLICY:

CITO Transport collects and administers a range of business and personal information for the purposes of transporting freight for customers, the employment of staff, regulatory compliance, and safety and security. CITO is committed to protecting the privacy of personal information it collects, holds and administers.

CITO is bound by the Privacy Act 1988 as well as other Commonwealth and State laws, which impose specific obligations when it comes to handling information.

The organisation has adopted the respective Privacy Principles contained in the Privacy Act as minimum standards in relation to handling personal information.

In broad terms this means that we:

- publish our Privacy Policy in full on our website;
- collect only information which the organisation requires for its primary function;
- obtain consent to collect personal information;
- ensure that when collecting personal information, the person is informed as to:
 - CITO's contact details;
 - the fact that they can access their information;
 - why we collect the information;
 - if any relevant law requires the collection of the information;
 - who we may give the information to; and
 - the consequences should all or some of the information not be provided.
- use and disclose personal information only for our primary functions or a directly related purpose;
- must not use personal information for a secondary purpose, unless consent is obtained;
- store business and personal information securely, protecting it from unauthorised access; and
- provide a person with access to their own information, and the right to seek its correction.

The HR Manager is responsible for administering CITO's Privacy and Confidentiality Policy.

1. CITO privacy policy

CITO Transport complies with the:

- Australian Privacy Principles contained in the Privacy Act 1988 (Cwth); and
- the Spam Act 2003 (Cwth) in relation to electronic marketing.

How to contact us

CITO Transport is committed to working with individuals to obtain a fair resolution of any complaint or concern about privacy.

- To contact us with a compliment, complaint or a privacy question, you can:

Write to us at:

Attention HR Manager

CITO Transport

Privacy Contact Officer

12 Quarry Rd

Tottenham Vic 3012

; OR

- Email us: hr@citotransport.com.au
- Fax: (03) 9331 5725
- Call us on (03) 9314 0928 between 9.00 am and 5.00 pm EST Monday to Friday.

Your acknowledgement of our Privacy Policy

This Privacy Policy is published on our website in order to meet our obligation under Australian Privacy Principle 1.3 which requires us to set out our policies on the management of personal information in a clearly expressed document which is available to anyone who asks for it.

Without limiting the generality of the above statement, your request for information or a quote, your use of our products or services or your use of this website constitutes an acknowledgement that you have been made aware of our privacy policies.

This policy does not create or confer upon any individual any rights or impose upon the CITO Transport any rights or obligations outside of, or in addition to, those rights or obligations imposed by the Privacy Act 1988 (Cwth), the Spam Act 2003 (Cwth), or related legislation (**'the legislation'**).

Should there be, in a specific case, any inconsistency between this statement and the Act, this statement shall be interpreted, in respect of that case, to give effect to, and comply with the legislation.

This policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

What is 'Personal Information'

'Personal information' means information we hold about you from which your identity is either clear or can be reasonably determined. When you give us your personal information, it imposes a serious responsibility on us. Protecting your privacy when handling your personal information is very important to us and is fundamental to the way we serve you.

About this Privacy Policy

We respect your personal information and your right to privacy. Protecting your privacy when handling your personal information is very important to us and is fundamental to the way we serve you.

This Privacy Policy describes the information that may be collected by CITO Transport, the choices you can

make about your personal information and how we protect your personal information.

If you would like a printed version of this policy, you can print this document using your browser. Alternatively, this Privacy Policy is available upon request; simply ask one of our staff.

Collection covered by this Policy

This Privacy Policy applies to situations in which CITO Transport collects your personal information, including but not limited to collection via websites operated by or on behalf of the CITO Transport.

This website may contain links to non-CITO Transport websites. CITO Transport is not responsible for the privacy policies of those other websites. We recommend you review the privacy policies of each site you visit.

Collection of personal information and how we may use it

Generally, we will collect personal information directly from you, and only to the extent necessary to provide a CITO Transport product or service or to carry out our internal administrative operations.

In some circumstances a third party may provide your personal information (name and contact details only) to us, and only to the extent necessary, in order for us to provide a CITO Transport product or service or to carry out our internal administrative operations.

We may collect personal information when:

- You request information from us by any form;
- You request a quote, or you are referenced by a third party in a quote;
- You seek a credit account, or you are referenced by a third party in a credit account application;

- You seek to use our services or products, or you are referenced by a third party seeking to use our services or products;
- You fill in an application form or you are referenced by a third party in an application form;
- You deal with us over the telephone or you have contact with us in person;
- You e-mail us or fax us;
- You ask us to contact you after visiting our web site; or

We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way. We will use your personal information only for the particular purpose that you provided it, or for a directly related purpose. We may otherwise use your personal information where that other use is:

- required or permitted by law; or
- with your express or implied consent.

Uses and sharing

As noted above, we will only collect personal information that's necessary to provide the product or service or to carry out internal administrative functions. We collect different personal information depending on the product or service requested. Some examples include:

- Consigning or receiving freight - When you or a third-party ship or receive freight with us we will capture the name and contacts details for the consignment along with shipping activities (for tracking purposes), the quantity, weight and dimensions of the consignment, the biller's details, and details of the sending location and facilities available and the receiving location and facilities available. This information allows us to route and charge for the consignment, provides contact details for us to seek further information or advise requirements in relation to the

consignment and allows us to respond to queries from both the sender and the receiver.

- Quoting - When you or a third party seek a quote to ship or receive freight with us, we will capture contact details of the consignment along with, the quantity weight and dimensions of the consignment, the biller's details, and details of the sending location and facilities available and the receiving location and facilities available. This information allows us to route and quote the consignment, provides contact details for us to seek further information or advise requirements in relation to the consignment and allows us to respond to queries from both the sender and the receiver.
- Completing a job application - When you complete a job application with us, we will capture personal details, including contact details, employment history, license details, training and education qualifications and medical history in order for us to assess your suitability for the position and to respond to the application. A job applicant may also provide your name, position and contact details in support of their application which we will capture.
- Completing an account application - When you complete an account application form with us, we will be capturing name and contact details in order to assess and respond to the application. An account applicant may provide us your name, position and contact details in support of their application which we will capture.

Generally, we will not use your personal information to market to you unless we have either your implied or express consent but in situations where it is impractical to obtain your prior consent, we will ensure you have an ability to opt out of future such communications.

We do not share your personal information with other organisations or to overseas recipients unless you give us your express consent, or where sharing is otherwise required or permitted by law, or where this is necessary on a temporary basis to enable our contractors to perform specific functions.

When we temporarily provide personal information to companies who perform services for us, such as specialist information technology companies, mail houses or other contractors to CITO Transport we require those companies to protect your personal information as diligently as we do.

Unsolicited information

"Unsolicited" personal information is personal information about an individual that an organisation has unintentionally received. This is an uncommon occurrence for CITO Transport, but when it does happen, we will protect your personal information with the same rigour as we treat personal information that we intended to collect. If we could not have collected this information through our normal processes, we will de-identify that information as soon as we can.

Your rights and choices

You may interact with us anonymously or by using a pseudonym (an alias) where this is lawful and practicable.

You have the right to request access to the personal information you provide, and to correct or update your personal information. This right is subject to certain exceptions allowed by law.

You may choose to not provide personal information when requested. If you choose to not provide your personal information when requested, we may not be able to deliver the product or service that you have requested. We will endeavour to make this as clear as possible for each service.

Direct marketing and your privacy

From time to time we may use the personal information we collect from you to identify particular CITO Transport products and services which we believe may be of interest to you. We may then contact you to let you know about these products and services and how they may benefit you. We will generally only do this with your consent and we will always give you a choice to opt out of receiving such information in future.

Direct mail

Where we use your personal information to send you marketing information via the post we may do so with your implied consent or, if this is impracticable, we will ensure that you are provided with an opportunity to tick an "opt out" box to ensure you do not receive future such communications. By not ticking a clearly displayed "opt out" box, we will assume we have your implied consent to receive similar marketing communications in the future. We will always ensure that our opt out notices are clear, conspicuous and easy to take up.

Electronic marketing

Where we use your personal information to send you marketing information by e-mail, SMS, MMS or other electronic means we may do so with your express or implied consent. You may give us your express consent by, for example, ticking a box on an electronic or paper form where we seek your permission to send you electronic or other marketing information. Consent may be implied from our existing business relationship or where you have directly or indirectly provided us with your electronic address.

All of our electronic marketing activities will comply with the requirements of the Spam Act 2003 (Cwth).

Your privacy preferences and choices

Every personalised marketing contact sent or made by CITO Transport will include a means by which customers may opt out of receiving further marketing information.

You may instruct us at any time to remove any previous consent you provided to receive marketing communications from us.

Information sharing

We have a strict duty to maintain the privacy of all personal information we hold about you. However, certain exceptions do apply. For example, where disclosure of your personal information is:

- **authorised or required by law**
e.g. disclosure to various government departments and agencies such as the Australian Taxation Office, Centrelink, Child Support Agency, Police or disclosure to courts under subpoena.
- **in the public interest**
e.g. where a crime, fraud or misdemeanour is committed or suspected, and disclosure against the person's rights to confidentiality is justified.
- **with your consent**
Your consent may be implied or express and it may also be verbal or written.

Use of third-party service providers

When we temporarily provide personal information to companies who perform services for us, such as specialist information technology companies, mail houses or other contractors to CITO Transport we require those companies to protect your personal information as diligently as we do.

Updating your information

It is inevitable that some personal information which we hold will become out of date. We will take reasonable steps to ensure that the personal information which we hold remains accurate and, if you advise us of a change of details, we will amend our records accordingly.

Access to your personal information

CITO Transport will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us.

However, we ask that you identify, as clearly as possible, the type/s of information requested. To access your personal information you may call, email, fax or write to us. The contact details are provided at the beginning of this policy.

CITO Transport will deal with your request to provide access to your personal information in a reasonable time - usually within 30 days of receipt of your request.

We will not charge you for lodging such a request, but we may recover from you our reasonable costs incurred in supplying you with access to this information.

Exceptions

Your right to access your personal information is not absolute. In certain circumstances, the law permits us to refuse your request to provide you with access to your personal information, such as circumstances where:

- we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- giving access would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious; or

- the information relates to existing or anticipated legal proceedings between us and you, and would not be accessible by the process of discovery in those proceedings; or
- giving access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations; or
- giving access would be unlawful; or
- denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- both of the following apply:
 - we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in;
 - giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal evaluative information generated in connection with a commercially sensitive decision-making process.

Refusal to give access

Should we refuse access to your personal information, or refuse to give access in the manner requested we will provide you written notice setting out:

- a. the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- b. the mechanisms available to complain about the refusal; and

- c. any other matter prescribed by the regulations.

Loss of Personal Information

Despite our every effort to protect your personal information, there remains the possibility that a breach of our security could occur. In the event of loss of personal information CITO Transport will:

- seek to rapidly identify and secure the breach to prevent any further breaches;
- engage the appropriate authorities where criminal activity is suspected;
- assess the nature and severity of the breach including the type of personal information involved and the risk of harm to affected individuals;
- notify the affected individuals directly if appropriate and where possible;
- if appropriate, put a notice on our website advising our customers of the breach; and
- notify the Privacy Commissioner (at the OAIC) if the breach is significant.

Information security

CITO Transport is committed to keeping your trust by protecting and securing your personal information.

We employ appropriate technical, administrative and physical procedures to protect personal information from unauthorised disclosure, loss, misuse or alteration.

We limit access to personal information to individuals with a business need consistent with the reason the information was provided. We keep personal information only for as long as it is required for business purposes or by the law.

Children's Privacy

We will use reasonable efforts to verify parental consent prior to the collection and use of personal information from children under 16. The method of verification may vary according to the information, product, service or event in which the child wishes to participate.

Consent may take a variety of forms including offline consent such as printing and submitting a permission form by mail, email or fax, or online consent such as by ticking an online check box that parental or guardian consent has been obtained.

We do not require parental or guardian consent in order to collect and use online or offline contact information to:

- respond directly to a child's request on a one-time basis, or to answer a specific request, where the information is not intended to be used to re-contact the child for other purposes
- request the name or on-line contact information of a parent/guardian for the sole purpose of obtaining verifiable parental consent or providing parental notification
- respond directly more than once to a specific request from a child and the information is not intended to be used to recontact the child beyond the scope of the request.

CITO Transport will allow parents or guardians to review any personal information collected from their children, subject to verifying the identity of the consenting parent/guardian.

Parents/guardians may revoke their consent and delete information collected from their children at their discretion.

Information collected on this website

We may collect non-personal information from you such as browser type, operating system, and web pages visited to help us manage our web site.

We use cookies and other internet technologies to manage our website and certain online products and services. We do not use these technologies to collect or store personal information unless you have opted in to such a feature.

Our internet server logs the following information which is provided by your browser for statistical purposes only:

- the type of browser and operating system you are using;
- your Internet Service Provider and top-level domain name (for example - .com, .gov, .au, .uk etc);
- the address of any referring web site (for example - the previous web site you visited; and
- your computer's IP (Internet Protocol) address (a number which is unique to the machine through which you are connected to the internet).

All of this information is used by CITO Transport for aggregated statistical analyses or systems administration purposes only. No attempt will be made to identify users or their browsing activities, except where required by or under law.

Cookies

A "cookie" is a packet of information that allows the CITO Transport server (the computer that houses our web site) to identify and interact more effectively with your computer.

When you access our web site, we send you a temporary or "**session cookie**" that gives you a unique identification number. A different identification number is sent each time you use our website. Cookies do not identify individual users, although

they do identify a user's internet browser type and your Internet Service Provider.

Shortly after you end your interaction with our web site, the cookie expires or "crumbles". This means it no longer exists on your computer and therefore cannot be used for further identification or access to your computer.

Without cookies certain personalised services cannot be provided to users of our website, accordingly you may not be able to take full advantage of all of our website features if cookies have been disabled.

Cookie Policy

We use session cookies in the following manner:

- Log-on and log-off administration - If you decide to register with our site, so as, for example, to use one of our online services, session cookies help with the log-on and log-off process. The cookies enable us to recognize your log-on ID when you log on so that we do not establish a duplicate registration record for you.
- Transactions and site usability - We use session cookies to improve how you navigate through our website and conduct transactions. As examples, session cookies are used to maintain your online session as you browse over several pages; to store and prepopulate information so that you do not have to re-enter the same information twice. Session cookies may also be used to collect referral statistics when you click on a link or ad banner to or from www.citotransport.com.au.

CITO Transport may also use "**persistent cookies**". A persistent cookie is a small piece of text stored on your computer's hard drive for a defined period of time, after which the cookie is erased. We will not collect or link to personal information through persistent cookies without your express consent.

We use persistent cookies as follows:

- Site usage measurement - Our site measurement tool uses a persistent cookie to assist us in measuring how and when our web site and its various components are used. It functions as a "visit cookie," so we can determine if you are a repeat visitor to our site. This allows us to know if we are attracting new visitors and what aspects of the site seem most useful. The cookie will expire 30 days after your last visit.
- Log-off safety function - We use a persistent cookie to automatically log you off of certain CITO Transport sites if there has been no activity for 15 minutes. This is done for your safety to ensure that, if you have finished using our site but have forgotten to log off, no one else can use your computer via your log on and password. The cookie is permanently removed from your computer when you log off, or, if you have closed the browser without logging off, it is removed within 15 minutes from your last activity.
- Opt-in cookies - Persistent cookies allow us, at your request, to recognise you when you return to www.citotransport.com.au or to remember certain information that you have provided us. The recognition feature allows you to log on to certain CITO Transport sites automatically, without having to enter your name and password each visit. The cookie assigns a random number to you, which we link to personal information you have provided and your site activity.

This allows us to personalise the site for you and tailor the content to your needs, for instance to show you banner ads about other products you may be interested in.

Other cookies allow us to remember certain information related to prior transactions, such as mailing or address lists, so we may prepopulate those fields for you on return visits. These features and cookies are strictly at your request and for your convenience. The cookies will expire one year from your last visit.

Cookie management

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions or help screens to learn more about these functions.

Most browsers automatically accept cookies. To learn more about cookies, including how to refuse cookies on your computer, please refer to your browsers help function.

Searches

Search terms that you enter when using our search engine are collected but are not associated with any other information that we collect. We use these search terms for the purpose of aggregated statistical analyses, so we can ascertain what people are looking for on our website, and to improve the services that we provide.

Also, from time to time, we may use external companies to provide us with detailed aggregate statistical analyses of our website traffic. At no time is any personal information made available to these companies, nor is the aggregate information ever merged with personal information such as your name, address, email address or other information you would consider sensitive or would compromise your privacy.

Further information on privacy

You can obtain further general information about your privacy rights and privacy law

from the Office of the Australian Information Commissioner by:

- calling their Privacy Hotline on 1300 363 992, or
- visiting their web site at www.oaic.gov.au , or
- by writing to:

The Office of the Australian
Information Commissioner

GPO Box 5218

Sydney NSW 2001

2. Employee Confidentiality Policy

Confidentiality of business information

Irrespective of your position within CITO Transport employees will be exposed to confidential information in relation to CITO business practices. This includes, but is not limited to:

- customer contact details or listings;
- contracts and or arrangements with customers, sub-contractors or business partners;
- business plans, processes and data;
- rules and procedures;
- procurement specifications and arrangements;
- accounting information;
- payroll and Personnel Records;
- business IT systems;
- specialised business systems of work or fleet management;
- know-how;
- markets;
- competitive analysis;
- databases;
- formats;
- methodologies;
- applications;
- developments;
- inventions;
- designs;
- drawings;
- algorithms;
- formulas; or
- information related to engineering, marketing, or finance.

All CITO business information remains the property of CITO Transport.

Employees are not to share, divulge, make known, send, or copy any CITO business information, unless:

- authorised by means of being a requirement, acknowledged in writing by a CITO Manager, of their day to day duties and responsibilities;

- if outside of their day to day duties and responsibilities is required in order to complete an assigned task and is specifically authorised by a Manager; or
- is specifically authorised by Senior Management.

For clarity these requirements specifically prohibit employees from sharing, copying, sending, making known or divulging any CITO business information with anyone or anything (electronic or otherwise), unless it is authorised as per the above.

Upon ceasing employment with CITO Transport or at any time of its choosing CITO Transport may revoke a previously given authorisation. Should this occur the employee is required to cease undertaking any activities that would breach confidentiality and return any confidential CITO information in their possession. Once all information is returned to CITO should a copy or multiple copies remain in the employee's possession these shall be permanently deleted or destroyed.

3. Electronic monitoring of workplaces

CITO Transport (CITO) is committed to meeting its statutory obligations under [Workplace Surveillance Legislation](#) and this Policy in conjunction with the **Information Technology & Media Policy** represents the formal notification to employees about activities of the CITO Transport that fall within the statutory definitions of surveillance.

CITO will comply with the legal requirements of legislation where surveillance is prohibited. This includes:

- a prohibition on surveillance in any change room, toilet facility, shower or other bathing facility at the workplace;
- a prohibition on surveillance when the employee is not at work except in cases of a

company vehicle or computer where the employee is using equipment and/or resources supplied by CITO;

c. a prohibition on blocking the delivery of emails unless:

- notice (prevented delivery notice) has been given to the employee; or
- where the incoming communication is perceived to be:

- spam,
- a threat to the security of a CITO computer or CITO's computer network;
- a threat to the security of any CITO computer software, program or data; or
- potentially menacing, harassing or offensive;

d. a prohibition on preventing delivery of an email or access to a website merely because it has been sent by or on behalf of an industrial organisation of employees or contains information about industrial matters.

Camera Surveillance

CITO operates security cameras on its premises both within and without buildings. This is for the purpose of ensuring the safety and security of staff, visitors, premises, equipment, property and facilities.

Cameras are not used for the surveillance of any persons, but camera footage may be accessed and used as evidence where an act (e.g. assault of a person, stolen property, damage to facilities) has occurred that warrants investigation by CITO. Such records may also be required by law to be provided to other parties such as a Court or to the Police.

Notices that CITO premises are monitored by cameras are located at the entrances to the relevant premises. Security cameras are located in and around facilities requiring security monitoring for the safety or security of individuals or property and are not disguised or secreted.

Camera security monitoring is continuous and ongoing.

Mobile Telephone Cameras

Cameras in mobile telephones supplied by CITO are not to be used to record images of any persons without their knowledge or consent.

Computer Surveillance

Use of the CITO's computers and associated systems is governed by the **Information Technology & Media Policy**. That policy prescribes the conditions under which employee access is provided to the CITO's facilities and systems.

In accordance with that policy, Senior Management may authorise staff to access CITO computers, computer logs and other system records, databases and backups to ensure the security, confidentiality, availability and integrity of CITO IT systems.

From time to time Senior Management may investigate suspected breaches of the law or CITO policies by staff using its IT systems and facilities and this can involve accessing a staff member's computer and electronic records. For staff, such investigations may involve misconduct or serious misconduct and is managed in accordance with the provisions of the **Standards and Conduct Policy**.

Senior Management and their delegates monitor staff use of computers and IT systems in the following areas:

- a. CITO workstations, servers, email and network services, printers, network connected devices, and connections to the internet;
- b. CITO retains logs, backups and archives of computing activities, which may be audited. Such records are the property of CITO, are subject to State and Federal laws and may be used as evidence; and
- c. monitoring may include, but is not limited to; storage volumes, download volumes, breaches of intellectual property laws, suspected malicious code or viruses.

Computer monitoring is continuous and ongoing.

Email and Internet

Email of staff members is not routinely read or monitored. However, emails are records of CITO and should be managed accordingly and will be accessible in that context. An email may also be the subject of an application under privacy legislation.

Senior Management or their delegates may access, and monitor staff use of CITO email and internet systems in the following ways:

- a. CITO monitors email server performance and retains logs, backups and archives of emails sent and received through the server. Even where the user has deleted an email, CITO may still retain archived and/or backup copies of the email. Only staff authorised by the Corporate Manager may examine such records;
- b. CITO retains logs, backups and archives of all internet access and network usage. These records may be audited, are subject to State and Federal laws and may be used as evidence. While individual usage is not routinely monitored, unusual or high-volume activities may warrant more detailed examination;
- c. For the purposes of producing the email in response to a legal requirement or other lawful investigation;
- d. for the purpose of determining, as part of an investigation by CITO, whether there has been unacceptable use of email to abuse or harass other persons;
- e. for the purpose of determining whether there has been a breach of CITO's policies by a staff member; and
- f. for the purpose of investigating allegations of misconduct or to provide materials to external investigative authorities lawfully investigating possible criminal conduct.

Tracking Surveillance

CITO operates tracking devices (Global Positioning Systems) in its vehicles and company issued mobile phone handsets. This is for the purpose of ensuring the safety and security of staff, assisting in the directing of vehicles for scheduling and loading purposes, to assist with regulatory compliance, and in some cases as a regulatory requirement.

CITO may access and monitor staff use of CITO vehicles and Mobile phones in the following ways:

- a. CITO retains logs, backups and archives of all tracking devices. These records may be audited, are subject to State and Federal laws and may be used as evidence. While individual usage is not routinely monitored, unusual or high-risk activities may warrant more detailed examination;
- b. for the purposes of producing data in response to a legal requirement or other lawful investigation;
- c. for the purpose of determining whether there has been a breach of the CITO's policies or a law in the use of the vehicle by a staff member;
- d. for the purpose of investigating allegations of misconduct or to provide materials to external investigative authorities lawfully investigating possible criminal conduct;
- e. for the purposes of scheduling a vehicle, driver or load; and
- f. for the purposes of assisting a driver in managing their schedule and compliance with the law.

Notices that CITO vehicles are monitored by GPS are located in the cabin of relevant vehicles. Monitoring of GPS equipped vehicles and devices is continuous and ongoing.

RESPONSIBILITIES

Senior Management:

Senior Management is responsible for:

- the allocation of responsibilities and funding to facilitate this policy; and
- authorising access to and release of information and records covered by this Policy.

HR Manager

For the purpose of this Policy the HR Manager has the responsibility to:

- handle all requests for records and documentation under this policy;
- seek authorisation from Senior Management in relation to any requests for access or to access information or records covered by this policy;
- ensure the appropriate technical, administrative and physical procedures are in place to protect personal information in accordance with this policy;
- ensure that a current copy of the Privacy Policy is displayed on CITO's website; and
- ensure that notices are in place addressing Camera Surveillance and Tracking Surveillance.

RESPONSIBILITIES - All Staff:

All persons are responsible for:

- ensuring that all customer information and other information gathered through daily tasks within your employment with CITO is not shared or divulged with another employee, sub-contractor or external persons or business unless it is specifically required in order to complete an assigned task or specific requirement of their day to day duties or authorised by Senior Management;