

PRIVACY POLICY

1. OBJECTIVES

Grants Horse Transport Pty Ltd (GHT or the Company) understands the importance of keeping personal information private.

This privacy policy is aligned with the Australian Privacy Principles as set out in the Privacy Act 1988 (Cth) (Privacy Act) and describes the way GHT may collect, hold, and disclose personal information.

2. TYPES OF PERSONAL INFORMATION WE MAY COLLECT

GHT understands your desire to protect personal information. We intend to inform you how your personal information will be gathered, tracked, or used, and to give you choices

GHT may collect the following types of personal information:

- Your contact details including your name, contact phone number and email address
- Details regarding conversations GHT have had with you
- Other information relevant to you that relates to the Company; and
- Sensitive information about you if you consent and it is reasonably necessary to provide our services to you.

3. HOW GHT COLLECT PERSONAL INFORMATION

GHT will collect personal information only by lawful and fair means, including:

- Directly from you or from your authorised representatives, including through meetings, interviews, your use of our website or subscription to our newsletters, business cards, interviews, or applications; or
- If unreasonable or impractical to collect the information directly from you, through indirect means such as from third parties which may include service providers or regulatory authorities.

4. HOW GHT USE THE INFORMATION WE COLLECT

Purposes for which GHT collect, hold, use and disclose personal information

- To enable you to access and use our Site, associated applications and associated social media
- platforms
- To contact and communicate with you
- For internal record keeping and administrative purposes;
- For analytics, market research and business development, including to operate and improve our business
- To run competitions and/or offer additional benefits to you
- For advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you
- If you apply for employment with us



- To provide you with information about product upgrades, new products, services, newsletters, informative emails, and research on future product ideas or improvements
- To assist GHT in creating content that is relevant to you
- To provide you with special offers that may be of interest to you; and
- To assist GHT in creating better products and services to meet your needs

Any personal information collected by us will generally only be used or disclosed for the purpose it was collected, although we may from time to time use personal information for another purpose where it would be reasonably expected by you or if allowed by law, including:

- Collecting statistical information (e.g. domain name, information you have accessed, cookies)
- Responding to email requests sent via our website
- Responding to other requests for information
- In the process of procuring advice from legal and accounting firms, auditors, contractors, consultants, and other advisers
- To provide you with updates about our business or important updates to the Company (unless you elect not to receive such communications, or for your personal information not To be used in conjunction with direct marketing)
- To provide services to you
- To market our services or opportunities to attend events or seminars
- To analyse or enhance our services or internal operations
- Where disclosure or use is required or authorised by law; and
- Any other purpose for which you have consented.

5. HOW GHT STORE PERSONAL INFORMATION

GHT will take all reasonable measures to protect your personal information from misuse, loss, unauthorised access, modification, or disclosure.

When GHT no longer require the use of your personal information, GHT will take reasonable steps to destroy or permanently de-identify it.

The internet is not always a secure environment. If you use the Internet to send us any information, you are sending it at your own risk. The GHT website may contain links to other websites and GHT are not responsible for the privacy practices or the content of such other websites.

Personal information may be stored electronically through third party data centres, which may be located overseas, or in physical storage at our premises or third party secure storage facilities.

The GHT website does not collect your personal information, except where you voluntarily supply such information.

6. TRANSFER OF PERSONAL INFORMATION

GHT may disclose and/or transfer your personal information other recipients based on:

- You have consented for us to disclose personal information to
- GHT related entities, employees or officers that may be in other locations
- External service providers that may assist us GHT in providing administration, information technology or other services
- External service providers, if necessary for us to provide you with your requested services; and
- Anyone else as authorised by law.



7. SECURITY

GHT have taken security measures, consistent with information practices, to protect your personal information. These measures include technical and procedural steps to protect your data from misuse, unauthorized access or disclosure, loss, alteration, or destruction.

8. ACCESS AND ACCURACY

Subject to exceptions allowed by law, you have the right to access personal information we hold about you and to seek its correction.

GHT make a sincere effort to respond to your requests to update or correct your personal information. If you believe GHT does not have your current/up to date personal information, you can update it by contacting GHT and request to update your information.

If you wish to request for access to your information, please contact GHT via email.

If you have a complaint concerning your information privacy, please contact GHT via email.

GHT may decline a request to access or correct personal information where allowed under the Australian Privacy Principles and use reasonable endeavours to provide you with our reasons in writing.

9. SENSITIVE INFORMATION

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

Provided that you have given consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected. Sensitive information may also be used or disclosed if required or authorised by law.

10. GHT RESPONSIBILITIES

As a business, GHT have certain obligations to comply with when collecting, storing, and using the personal information. GHT will ensure your personal data will:

- Be processed lawfully, fairly and in a transparent manner by us
- Only be collected for the specific purposes we have identified in this policy and personal information will not be further processed in a manner that is incompatible with the purposes we have identified
- Be collected in a way that is adequate, relevant, and limited to what is necessary in relation to the purpose for which the personal information is processed
- Be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information)
- Be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal data was collected
- Be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction, or damage.
- GHT have internal policies in place which set out where and how we collect personal information, how it is stored and where it goes after we get it, in order to protect your personal information.



11. AMENDMENTS

GHT reserve the right to amend this document at any time without notifying you.

12. CONTACT

If you would like more information regarding this Privacy Policy or the way GHT manage your personal information, or, if you wish to make a complaint, please contact GHT. GHT will endeavour to investigate the complaint and respond to you.

If you are unhappy with the response, complaints may be made to the *Office of the Australian Information Commissioner* (<u>www.oiac.gov.au</u>).

13. COMMITMENT

When GHT collect, store, and use your personal information, we do so in accordance with the rules set down in the *Australian Privacy Act 1988 (Cth)*.

All GHT Employees are committed to this Privacy Policy.

Grant Herreygers Owner/Managing Director January 2022