

# TRANSURBAN PRIVACY POLICY

EFFECTIVE 12 MARCH, 2014

Transurban respects people's privacy. Transurban is bound by the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (the **Privacy Act**), as well as other applicable laws protecting privacy. In some instances, road specific legislation sets out additional relevant privacy obligations. Transurban will ensure that all the personal information that it handles is managed in accordance with those laws.

In this Privacy Policy:

**Transurban** means:

1. each of Transurban International Limited (ABN 90 121 746 825), Transurban Holdings Limited (ABN 86 098 143 429) and Transurban Holding Trust (ARSN 098 807 419) by its responsible entity Transurban Infrastructure Management Limited (ABN 27 098 147 678) (the 'Stapled Entities');
2. each company in which the Stapled Entities, whether individually or collectively, own (directly or indirectly) more than 50% of the voting shares; and
3. each trust in which the Stapled Entities, whether individually or collectively, own (directly or indirectly) more than 50% of issued units;

**Transurban Road** means any road in Australia that is operated by Transurban, including CityLink, Hills M2, Lane Cove Tunnel, Eastern Distributor and Westlink M7; and

**personal information** means information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

This Privacy Policy describes how Transurban manages personal information. Transurban may modify or update its Privacy Policy from time to time by publishing it on Transurban's websites (including <http://www.transurban.com.au/privacy.htm>). Transurban encourages individuals to check the Transurban website periodically to ensure that they are aware of Transurban's current Privacy Policy. Transurban also maintains a Credit Reporting Policy, which explains how Transurban manages credit-related personal information. A copy of Transurban's Credit Reporting Policy is available on Transurban's websites (including <http://www.transurban.com.au/crp>).

### **What personal information does Transurban collect and why?**

Transurban collects the personal information it needs to provide services and information to its customers and the community, for its business operations (including the operation of Transurban Roads) and to comply with the law. If an individual chooses not to provide certain personal information to Transurban, Transurban may not be able to provide the individual with certain services or information relating to Transurban Roads.

Generally, if appropriate, Transurban will tell an individual why Transurban is collecting personal information when Transurban collects the information and how Transurban plans to use the information, or these things will be obvious when Transurban collects the information.

The following are the main types of personal information collected by Transurban and the main purposes for which they are collected.

- **To operate Transurban Roads**

Transurban may collect information about an individual such as his or her name and contact details, date of birth, payment and billing information, credit card number, drivers licence number, licence plate number, vehicle make, model, year, colour, registration and acquisition date, photograph of the individual's motor vehicle, and information about his or her use of Transurban services and Transurban

Roads including the date and time of travel. Transurban may use this information to supply its services, operate Transurban Roads, and recover its tolls.

- **To comply with the law**

Transurban may collect information about an individual as required or permitted by law. For example, Transurban is required by law to keep certain records, including information about the payment and non-payment of tolls.

- **To assist with queries**

An individual may provide Transurban with his or her name or other contact details when he or she calls Transurban by phone, writes to Transurban or contacts Transurban using its websites so that Transurban can respond to requests for information about customer accounts, its services and Transurban Roads. For example when an individual makes an enquiry using a Transurban website, he or she may be asked to provide a name, email address, telephone number and other contact information.

- **As part of Transurban's general business operations**

Transurban also collects personal information about individuals who are contracted to, or employed by, Transurban, Transurban's suppliers (including third party service providers), related companies, agents and customers. As required, this information may include an individual's name contact details and other information necessary for Transurban to conduct business or maintain an employment relationship with that individual. As necessary and where appropriate, Transurban may require employees to undergo certain periodic or occasional medical checks.

- **To consider an application for a job with Transurban**

When an individual applies for a job or contract with Transurban, Transurban may collect certain information from the individual (including his or her name and contact details, information about his or her working history and relevant records checks), from any recruitment consultant and from the individual's previous employers and others, including referees and publicly available sources, that may be able to provide information to Transurban to assist Transurban in its decision on whether or not to make the individual an offer of employment or engage the individual under a contract. As necessary and where appropriate, Transurban may require prospective employees to undergo certain medical checks. This Privacy Policy may not apply to acts and practices in relation to employee records of Transurban's current and former employees, which may be subject to the employee records exemption in the Privacy Act.

Transurban asks that individuals do not disclose to it at any time any sensitive personal information (such as information related to anyone's health, racial or ethnic origin, political opinions, religious beliefs or affiliations or trade union membership).

### **How does Transurban collect personal information**

Transurban will generally collect information directly from the individual to which it relates. However, Transurban may collect information about an individual from a third party, such as government road and traffic authorities (including VicRoads and New South Wales Roads and Maritime Services) and government service providers. Transurban may also collect personal information from other Australian toll-road operators. Transurban may supplement the information it collects with information from other sources, such as generally available publications.

Transurban may also collect personal information through automatic incident detection systems (including traffic management and safety cameras), vehicle registration detection systems and electronic toll collection systems (such as an "e-TAG" attached to an individual's vehicle).

### **How does Transurban use and disclose personal information?**

Transurban generally uses and discloses personal information for the purposes for which it was collected, in order to provide Transurban services and operate Transurban Roads (including as described above), to recover tolls and fees payable under your customer service agreement, for debt collection and enforcement purposes, to investigate or to pursue any legal claim that we may have against you, for road safety purposes or as otherwise required or authorised by law.

Transurban discloses certain personal information to other Australian toll-road operators. For example, when an individual opens an account to access a Transurban Road, Transurban will use and disclose the individual's personal information for the purposes of facilitating their travel on Transurban Roads and any other Australian toll-roads with which Transurban has 'roaming' arrangements in place, and to allow the operators of those roads to obtain payment for travel.

When Transurban collects personal information, it may sometimes also use that information to carry out market research and other analysis so that Transurban can improve its services and improve the operation of Transurban Roads. As part of conducting Transurban's business, personal information may also be used to maintain and develop Transurban's business systems, including testing and upgrading them.

Transurban Customer Relations may use an individual's personal information to keep the individual up to date with information about Transurban services and Transurban Roads. If the individual does not want Transurban to use their personal information in this way or to be sent any further information, the individual can always let Transurban know by unsubscribing from emails or contacting Transurban Customer Relations using the contact details given below.

Transurban may de-identify information about an individual so that the information can no longer be related to that individual. Transurban may then use and disclose that de-identified information in the course of its business. Transurban may also aggregate information on the use of its services and Transurban Roads (for instance, traffic information) in such a way that no information identifying an individual is disclosed and may use and publicly disclose such aggregated information.

Where appropriate, Transurban 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.

### **Disclosing personal information**

For the purposes described in this policy, Transurban may disclose personal information:

- subject to any restrictions imposed by any relevant legislation, among the Transurban entities named in this Privacy Policy and their related entities (including related entities located in the United States);
- under information sharing arrangements with the operators of other Australian toll-roads;
- to Transurban's suppliers, service providers, professional advisers and agents. The types of suppliers Transurban may disclose personal information to include:
  - call centre operators;
  - mailhouse organisations;

- contractors that own or operate distribution outlets (such as electronic kiosks);
  - ePay and Australia Post;
  - towing, roadside support and maintenance and logistics contractors;
  - debt collection companies and credit reporting bodies;
  - delivery supply contractors;
  - information technology suppliers that provide support, maintenance and upgrade services for Transurban systems; and
  - direct marketing contractors;
- to government agencies and any entity responsible for the collection of tolls or the taking of enforcement action concerning use of Transurban Roads;
  - to anyone to whom Transurban's assets or business (or any part of it) is transferred;
  - where an individual to whom the personal information relates has otherwise consented; or
  - as otherwise required or permitted by law. For example, Transurban may disclose information in response to a subpoena, warrant, or request from a government law enforcement agency, or as required under legislation and regulations applying to specific Transurban Roads. Transurban may disclose information to AUSTRAC under applicable anti-money laundering legislation if you have an account balance above \$5,000.

### **Cross-border disclosures**

Transurban may disclose information to recipients that are located outside Australia. Transurban may disclose personal information to overseas contractors, and may use off-shore servers for the purposes of data storage. Transurban has engaged contractors in the Philippines, the United States and certain other countries, and may disclose certain personal information to those contractors. Transurban may also disclose certain personal information to its related entities in the United States, although such information will typically only relate to employees and internal corporate matters and not customer information or the operation of Transurban Roads in Australia. Transurban will take commercially reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

### **Cookies and IP address tracking**

Transurban's websites may use cookies for site administration purposes. If for any reason an individual wishes not to take advantage of cookies, the individual may have his or her browser not accept them (although this may disable or render unusable some of the features of a Transurban website).

Transurban's websites may also detect and use an individual's IP address or domain name for internal traffic monitoring and capacity purposes or to otherwise administer the website. No personal information is obtained, rather the patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content based on aggregate or statistical review of user site traffic patterns.

### **Links to other sites**

A Transurban website may contain links to other websites. Transurban is not responsible for the privacy practices or the content of such other websites. The privacy policies applicable to such other websites may differ substantially from this Privacy Policy, so Transurban advises individuals to read them before using those websites. Transurban will not be liable for any use of those websites.

### **Security**

Transurban implements 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. Please note, however, that the internet is not a secure environment and although all care is taken, Transurban cannot guarantee the security of information provided to it via electronic means.

### **Access and correction and complaints handling**

An individual has a right to access most personal information that Transurban has about that individual. In some circumstances it may not be possible for Transurban to provide the individual with all of his or her personal information or an exemption under the Privacy Act may apply. For instance, Transurban may not provide access to information if disclosing that information would impact on the privacy of another individual. Where Transurban will not provide access to personal information held about an individual, Transurban will tell the individual why.

When an individual requests access to personal information, Transurban may need to take measures to verify the individual's identity before providing them with such information. If an individual thinks that any personal information Transurban holds about him or her is inaccurate, the individual may contact Transurban Customer Relations and Transurban will take reasonable steps to ensure that the information is corrected. Transurban can correct most personal information over the telephone, but correction requests may need to be made in writing in some cases.

If an individual wishes to make a complaint about the way Transurban has handled his or her personal information (including if the individual thinks Transurban has breached the Privacy Act) the individual may do so by contacting Transurban Customer Relations in writing, by mail or email to the address or email address set out at the end of this Privacy Policy. If a complaint is made, please include contact details such as email address, name, address and telephone number and clearly describe the complaint. Transurban Customer Relations will investigate the complaint and respond promptly. If the complainant considers that Transurban has failed to resolve the complaint satisfactorily, the complainant can complain to Tolling Customer Ombudsman. As at the date of this Privacy Policy, the Tolling Customer Ombudsman's contact details are as follows:

Mail: PO Box 7095, Hawthorn North VIC 3122

Telephone: 1800 145 009

Email: [admin@tollingombudsman.com.au](mailto:admin@tollingombudsman.com.au)

Website: <http://www.tollingombudsman.com.au/>

Alternatively a complainant can complain to the Office of the Australian Information Commissioner.

For access and correction enquiries and complaints, please contact Transurban Customer Relations using the contact details provided below.

### **Anonymity**

Where it is lawful and practicable, Transurban will provide an individual with the option to deal with Transurban and use Transurban Roads without identifying themselves.

### **Further information**

For further information about Transurban's privacy policies or practices please visit the Transurban website at [transurban.com](http://transurban.com). or contact Transurban Customer Relations by mail, email or phone.

**New South Wales**

Roam

**Victoria**

CityLink Customer Resolutions

Locked Bag 5002  
Parramatta, NSW 2124  
Email: [enquiries@roam.com.au](mailto:enquiries@roam.com.au)  
Tel: 02 9834 9481

Locked Bag 28  
South Melbourne MDC, Vic 3205  
Email: [resolve@citylink.com.au](mailto:resolve@citylink.com.au)  
Tel: 03 8656 8770

OR

Roam Express  
Locked Bag 5002  
Parramatta NSW 2124  
Email: [help@roamexpress.com.au](mailto:help@roamexpress.com.au)  
Tel: 02 9086 6400