

PRIVACY POLICY

Updated on: 16 Sept 2025

This Privacy Policy defines AAW Group's principles and practices which we adhere to in order to safeguard personal information collected from Stakeholders.

By adhering to applicable Australian privacy laws, this Privacy Policy ensures transparency, accountability, and trust in how Personal Information is handled and safeguarded.

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1. Introduction

1.1. Purpose

AAW Group is committed to protecting your privacy and ensuring the security of your Personal Information. We continuously implement and enhance Security Measures to protect the Personal Information we collect in accordance with this Privacy Policy ("**Policy**").

The purpose of this Policy is to explain how we collect, protect, and manage your personal information. It also provides guidance on how you can request a copy of or update to the Personal Information we hold about you.

Should you wish to lodge a complaint regarding this Policy or the manner in which we handle your personal information, please refer to the complaints procedure outlined in clause 3.12 of this Policy.

1.2. Application

This Policy is designed to comply with your privacy rights under the Act and applies to all Stakeholders in conjunction with any other terms and conditions applicable to our Website and the services we provide. By interacting with us, you consent to the terms outlined in this Policy.

We reserve the right to modify or update this Policy at our discretion. Where there has been a material change to this Policy, we will notify you by email or by putting a notice on our Website.

2. Definitions

AAW Group: means AAW Group Holdings Pty Ltd (ACN 007 257 865) and its related bodies corporate, such as AAW Global Logistics (Australia) Pty Ltd (ACN 668 555 048), also trading as AAW Project Logistics; AAW Bulk Liquid Logistics Pty Ltd (ACN 668 554 710); AAW Global Logistics (NZ) Limited (NZCN 6844333); Regional Shipping Services Pty Ltd (ACN 087 872 580), also trading as PIL Logistics Australia; Coastalbridge Pty Ltd (ACN 668 259 818), also trading as Coastalbridge Agencies; and the joint venture Hoyer Logistics Australia Pty Ltd (ACN 625 946 232).

Act: means the *Privacy Act 1988* (Cth).

Cookies: Technologies used to enhance user experience and monitor site usage, including small text files stored on users' devices and software applications embedded within webpages.

Credit Card Details: Information provided by Website users for the purpose of processing payments on the Website, including credit card number, expiration date, and security code.

Disclosure: The act of making Personal Information accessible or available to others outside of AAW Group.

IP Address: A unique numerical label assigned to each device connected to a computer network, used for communication and identification purposes.

OAIC: The Australian privacy regulator, being the Office of the Australian Information Commissioner.

Personal Information: has the meaning given to it in the *Privacy Act 1998* (Cth).

Registration: The voluntary process through which users provide personal details to create an account on the Website, enabling access to additional features and services.

Security Measures: Procedures and protocols implemented to protect the confidentiality, integrity, and privacy of personal information submitted through the website, including encryption, firewalls, and access controls.

Stakeholders: All individuals who interact with AAW Group, including but not limited to, users of our Website including those who apply for Registration and/or potential employment via the Website, our customers and business partners and any other party engaging with us in relation to the services we provide.

Website: <https://aawglobal.com.au/>.

3. Guidelines

3.1. Personal Information

We will only collect Personal Information from you (the "Stakeholder") that is necessary and relevant to our relationship with you, including to enable us to provide you with the best possible service and customer experience. While the precise nature of the Personal Information we may require, will depend on the specific services that we are providing to you and the exact nature of our engagement and relationship with you, generally we may request that you provide some or all of the following information:

- Identification information such as your name/s and address;
- Contact information such as your email address and phone numbers;
- Your IP Address;
- Government issued identification details including but not limited to tax identification and driver's license numbers (and copies of the same); and
- Registration log in details such as usernames and passwords.

In circumstances where you are paying for services or making an application for credit, in addition to the above, we may request the following:

- Credit Card Details (including copies of the same);
- Your employment information such as your occupation, salary and period of employment;
- Financial information such as your account details or information pertaining to existing debts or repayment obligations; or
- Current credit & loan history, including information relating to any accounts and past bankruptcies or defaults.

3.2. Collection Generally

We collect Personal Information by a number of methods including:

- Your access to our website, including submission of forms on our Website, Registration or through Cookies.
- Our conversations with you, either in person, via email or over the phone; or

- From third parties such as credit reporting bodies, law enforcement agencies and other government entities (such as when undertaking credit checks and verifying MSIC applications and credentials).

3.3. Collection via Cookies

Cookies assist AAW Group in managing customised settings of the Website and delivering you content. They facilitate your ongoing access to and use of our website and allow us to track usage patterns and to compile data that can help us improve our content and target advertising.

The types of Cookies and Applets we might use and purposes for which we use them include:

- **Essential (Strictly Necessary) Cookies:** Required for website functionality (e.g., logins, security). Without these services AAW Group cannot provide the services.
- **Performance & Analytics Cookies:** Track Website usage to improve performance (e.g., Google Analytics). These Cookies assist AAW Group operate, maintain, and improve our services.
- **Functionality Cookies:** Remember user preferences (e.g., language, theme). Required for AAW Group to be able to personalise Website content for you, greet you by name and remember your account preferences.
- **Advertising & Targeting Cookies:** Deliver personalised ads and track user activity.
- **Social Media Cookies:** Enable content sharing and social login; and
- **Security & Fraud Prevention Cookies:** Detect suspicious activity and enhance security.

In addition to the above, we may permit third-party service providers, including analytics and advertising partners, to set cookies (as listed above) on your device. These cookies are governed by the privacy policies of the respective third-party providers. You can opt out of the use of Cookies by clicking on the "Manage my preferences" link in the Website footer. If you would like more details about our use of Cookies and how to manage them, please contact us using the details provided below, or consult your browsers help settings.

3.4. Collection from Third Parties

Where reasonable and practicable to do so, we will collect Personal Information directly from you. We may also collect Personal Information about you indirectly i.e., through our use of Cookies or via third parties such as, and not limited to:

- Your current or previous employer.
- Credit reporting bodies, law enforcement agencies and other government entities.
- Personal and professional references.
- Medical organisation; or
- Third party companies which are authorised to share Personal Information.

3.5. Purpose of Collection

Personal Information which Stakeholders submit to us is used only for the purpose for which it is submitted, or for secondary purposes that are either related to the primary purpose or that you have consented to. Unless we disclose other uses in this Policy or otherwise at the time of

collection, the purposes which Personal Information might be submitted by you relate to our functions and activities, including to:

- Submit and manage your Registration.
- Provide you with and improve optimal Website functionality, services, and information.
- Deliver a more personalised experience and service offering.
- Consider your potential employment with us; and/or
- Conduct a range of administration activities relating to you, including investigating and managing complaints, processing applications, administering billing and payment services, and complying with legal requirements.

It is entirely your choice as to whether you provide us with your Personal Information. However, if you do not provide the Personal Information we have requested, we might not be able to:

- Provide some of services which you require.
- Provide you with specific website features and online browsing features.
- Thoroughly investigate or resolve any complaints made by you.
- Process applications for employment, credit or other assistance.
- Provide you with tailored services; or
- complete your Registration.

3.6. Disclosure/Use of Personal Information

We may use or disclose your personal information for the purpose for which it was collected, or for such other secondary purposes that are reasonably expected to be related to the primary purpose or otherwise consented to by you.

Any Disclosure of your personal information (excluding sensitive information) for a purpose other than the primary purpose will be in accordance with requirements under Act or other applicable laws or with your consent.

Use

AAW Group may use your personal information to:

- Maintain our records.
- Process payments.
- Enable us to provide services for you.
- Finalise and maintain your Registration.
- Provide you with information that you have requested.
- Monitor or improve the quality and standard of service that we provide to you as well as Website functionality.

- Conduct necessary background research (including ASIC searches) on customers and prospective customers.
- Consider any applications for employment with us.
- Process your Registration.
- Process credit applications.
- Consider any concerns or complaints you may raise against use; or
- Comply with our regulatory reporting obligations and other legal obligations.

Disclosure

Your information may be disclosed to our employees, related corporate entities, contractors, or sub-contractors and/or service providers, for the purpose of delivering our business services to you. Your information may also be disclosed on to:

- Third party organisations providing services to AAW Group such as IT software providers, financial institutions, couriers, data entry service providers.
- Professional advisors such as legal counsel, accountants, business advisors, consultants; and/or
- Any organisation for any authorized purpose with your express consent.

In addition to the above, AAW may disclose your personal information to law enforcement authorities or government agencies if required or permitted by law, or if we are compelled to do so in order to comply with our legal obligations.

3.7. International Transfers

AAW Group has outsourced certain administrative processes to entities which are based in Philippines and Singapore, which are not subject to the laws of Australia. As a result, your Personal Information may be transferred to these entities so that we can provide our services to you.

While these countries may not have privacy laws that conform to Australian laws and regulations, we continue to take all necessary steps to ensure that your Personal Information is treated in the manner prescribed under Australian laws and regulations.

If you would like more details about the countries which we may disclose your Personal Information to or the steps we have taken to ensure your Personal Information is secure in these jurisdictions, please contact us.

3.8. Security and Storage of Personal Information

We strive to ensure the security, integrity and privacy of personal information submitted to our websites, and we review and update our Security Measures in light of the latest technologies.

Unfortunately, no data transmission over the Internet can be guaranteed to be completely secure. However, we will endeavour to take all reasonable steps to protect the personal information you may transmit to us. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.

We may hold your Personal Information in both paper-based files in secured storage compartments, and other electronic record keeping methods in secured databases as set out below.

Physical records

Personal information may be collected in paper-based documents and converted to electronic forms for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference, and loss and from unauthorised access, modification, or Disclosure. AAW Group maintains physical security over paper-based documents.

Electronic records

We take the security of your personal information seriously. To protect the integrity and confidentiality of your data, we implement robust Security Measures, including secure backups and encryption, to safeguard your data. These measures are designed to ensure that your information is safely stored and protected from unauthorised access.

Third party storage providers

We may store electronic records of your personal information with other third parties, including but not limited to third party:

- database storage providers, which may be based in Australia and/or overseas (as detailed in clause 3.7); and/or
- agronomic software stored on a secured electronic cloud server.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us. However, we will not be held responsible for events arising from unauthorised access to your Personal Information.

3.9. Third party websites and links

From time to time, links to third-party websites, services and products will be available on our website or referred to in our correspondence with you (**Third-Party Links**). The Third-Party Links are provided for your convenience, informational and tracking purposes only. Clicking on the Third-Party Links will direct you to external websites of that third party, which are not operated or controlled by us.

By accessing these Third-Party Links provided by us, you acknowledge and understand that AAW Group does not control any content displayed (including any policies) on the associated websites. AAW Group does not control the collection of any Personal Information or operation of the websites (including security, or data collection practices), reached via those Third-Party Links.

You acknowledge and agree that:

- You are visiting these websites via Third-Party Links at your own risk, and we encourage you to review any policies before providing any personal information.
- AAW Group will not be responsible for any content (including any terms of use and privacy policies) contained on those third-party websites or how the operators of those websites your personal information; and
- AAW Group will not be held liable for any loss, damage, or privacy concerns arising from your use of these websites.

If you have any questions the above, please contact us using the details provided in this Policy.

3.10. Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it. If you wish to access your Personal Information, please contact us in writing detailing who requests access to the Personal Information and for what purpose. In order to protect your Personal Information, we may require identification from you before releasing the requested information.

3.11. Maintaining the Quality of your Personal Information

AAW Group will take reasonable steps as necessary to ensure that Your Personal Information is accurate, complete, and up to date. If you find that the Personal Information we have is not up to date or is inaccurate, please advise us as soon as possible to update our records and ensure we can continue to provide quality services to you.

3.12. Privacy Policy Complaints and Enquiries

Complaints to us

If you have any queries or complaints about our Privacy Policy, please contact the Privacy Officer at:

Post: Level 1, 102 Dodds Street, Southbank, VIC 3006

Ph: +613 9611 6860

Email: compliancedept@ilm.com.au

The complaint will be referred to our Privacy Officer. The Privacy Officer will investigate the issue and determine the steps that we will undertake to resolve your complaint. You can contact the Privacy Officer using the details set out above. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation.

3.13. Data Breaches

Data breaches are possible when personal information we possess is lost or subjected to unauthorised access or Disclosure.

As per the Notifiable Data Breaches scheme (NDB) implemented by the Act and our Data-Breach-Response-Plan, AAW Group will notify affected individuals and the OAIC in the event of an eligible data breach, and Personal Information being disclosed without authorisation. AAW Group will take all reasonable and practical measures to contact individuals whose personal information is involved. We will also report any breach of data to the OAIC.

Complaints to OAIC

If you are not satisfied with our response or we fail to provide a response to your complaint within 30 days of receipt of your complaint, you can lodge a privacy complaint with the OAIC. The contact details for the OAIC are set out below:

Post: GPO Box 5288, Sydney NSW 2001

Ph: 1300 363 992

Fax: (02) 9284 9666

Website: <https://www.oaic.gov.au/>

4. Policy Responsibilities

This Policy will be reviewed by the AAW Group's then nominated Group Chief Risk Officer in conjunction with the Chief Information Officer, the IT Systems Manager and Legal Counsel annually (unless otherwise required) and all amendments thereto will be reviewed and approved by the AAW Group's then nominated Chief Information Officer.

5. Accessibility to this Policy

This Policy will be published on the Website for easy access and once implemented, communicated to all relevant stakeholders, via our intranet and / or email. By making the Policy widely available and easily accessible, we ensure that all individuals involved with AAW Group understand and adhere to our privacy practices.

6. Training and Awareness

AAW Group will provide training and communication related to this Policy to all employees, contractors, and affiliates of AAW Group to ensure understanding and compliance.

7. Related Legislation, Policies and Documentation

7.1. Legislation

- Privacy Act 1988 (Cth) - Australia
- Privacy Act 2020 – New Zealand

7.2. Other Relevant Documents

- Data-Management-&-Retention-Policy
- Data-Backup-Policy
- Data-Breach-Response-Plan
- <https://www.oaic.gov.au/privacy/notifiable-data-breaches>