



# TASMAN CARGO AIRLINES

## Privacy Policy Employees

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## Tasman Cargo Airlines Pty Ltd Privacy Policy

### 1 Privacy Policy

Tasman Cargo Airlines Pty Ltd (ABN 50 073 412 272) (**we, us or our**) are committed to protecting the privacy of your personal information in accordance with the *Privacy Act 1988* (Cth) including the Australian Privacy Principles, and the New Zealand Privacy Act 2020 (together, the **Privacy Laws**).

This Privacy Policy is intended to provide a general overview of how we handle your personal information. "Personal Information" is essentially information or an opinion about an identified or reasonably identifiable individual.

By providing your personal information to us you consent to us handling your personal information in accordance with this Privacy Policy.

This Privacy Policy is intended to cover most personal information handled by us but is not exhaustive. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise at that time a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose.

If you have any queries about our handling of your personal information, please contact us for further information using the details below.

### 2 Collection of your personal information

We may collect personal information about you in the course of your dealings with us. The type of personal information we collect will depend on your dealings with us (for example, if you use our website, when you order services from us, if you contact us via telephone or email). Personal information we may collect includes:

- your name and date of birth,
- contact details (such as telephone number and email address, home address);
- other personal information that we require or that you volunteer to us (such as your resume, details of your qualifications, skills, education provider, work history, legal travelling documents, tax ID numbers, employment fund details and residency status when you apply to work with us);
- any other personal information required to satisfy mandatory requirements of Aviation / Airport authorities necessary to perform duties.

We will only collect information that is necessary for our business functions. We collect your personal information directly from you, unless it is impracticable or unreasonable to do so. If circumstances require, we may collect personal information about you from third parties (such as your employer, recruitment agencies, personal referees or background checks) or publicly available resources (eg social media).

We receive any personal information that you provide to us about third parties on the understanding that we have the relevant individual's consent for us to collect and handle their personal information in accordance with this Privacy Policy.

If you fail to provide personal information requested by us, or if the personal information you supply is incorrect or incomplete, there may be a range of consequences, for example we may be unable to process or respond to your employment application.

**3 Sensitive Information**

We will only collect sensitive information (which may include race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or details of health or disability) where:

- a. you have given consent to the collection and it is reasonably necessary for one of our functions or activities; or
- b. the collection of the information is required or authorised by or under Australian law.

We will assume you have consented to us collecting, using and disclosing (in accordance with this Privacy Policy) all information that you provide to us, including any sensitive information, unless you tell us otherwise at the time of collection.

**4 Purposes for which personal information is collected, held, used and disclosed**

We will generally only use your personal information for the purpose for which we collected it, or for related purposes we consider would be within your reasonable expectations.

Generally, we may use your personal information for purposes that include:

- to verify your identity, if necessary;
- to determine whether you are suitable for a job you have applied for;
- to comply with our legal obligations as an employer;
- to create and manage employee files;
- to enable the daily administrative management of employees (e.g. maintenance of employment contracts, absences, training, occupational/ accident reporting, career management and disciplinary matters);
- to pay employees their wage and salary and reimburse expenses where necessary;
- to provide information that you request and to respond to your enquiries;
- for our general business operations (for example, maintenance of our business records, compliance with our legal and insurance obligations and statistical purposes); and
- to perform denied party screening under the local and international laws.

By providing us with your personal information, you consent to us using your personal information for these purposes.

We may disclose your personal information to our agents and/or contractors for the purposes set out above.

We also may share your information in response to subpoenas, court orders, or other legal process or as otherwise required by law (including to law enforcement and national security agencies, and other government and regulatory authorities).

Where we propose to use your information for a purpose other than as outlined above, we will seek your permission (unless we are required or permitted by law to do so without seeking consent).

**5 Storage and security of your personal information**

We may hold your personal information in electronic formats or in hard copy. We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised use, access, modification and disclosure, and from other types of misuse, interference and loss.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our information technology system back-up records.

If you provide any personal information to us via our online services (including email) or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

## **6 Disclosure of personal information**

We will generally only disclose your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

We may disclose your personal information to certain suppliers that provide services to us (for example, payroll processing companies, denied party screening or other service providers). We ensure such organisations are contractually required to ensure that information we disclose is used only for the limited purposes for which we provide it.

## **7 Disclosure of information overseas**

In some cases, the organisations to whom we may disclose your personal information may be based outside New Zealand or Australia. We will only disclose your personal information outside New Zealand or Australia pursuant to Privacy Laws. For example, we may disclose your personal information to:

- our related entities, who may be located in various countries around the world; and
- our service providers who are based in various countries around the world. For example, we have human resources, payroll and enterprise resource planning systems located in Australia, New Zealand, Europe, Malaysia and in the USA and our denied party screening services provider is located in the USA.

## **8 Access and correction of your personal information**

Please notify us if your personal details change so that we may keep our records current.

You may lodge a request to access your personal information or to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, in which case please contact us using the contact details below.

Generally, we will provide you with that access, except in limited circumstances where the law permits us to deny access. In those circumstances, we will provide you with written responses for refusal (unless it is unreasonable to do so).

Any such requests must be made in writing to us. We will respond to the request for access within a reasonable period and we will give access to the information in the manner requested if it is reasonable and practicable to do so. We may require you to comply with certain procedures before we allow access to or amendment of your personal information in order to ensure the integrity and security of information that we hold (ie, providing a form of identification).

## **9 Data breach**

If a data breach or suspected data breach occurs, we will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. In such a situation we will comply with the requirements of the Privacy Laws which may require notification to the privacy regulator and affected individuals.

Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk mitigation and notification activities as required.

**10 Complaints**

If you have a complaint about the way in which we handle your personal information, or you believe that a breach of your privacy has occurred, please contact us using the details below.

Your complaint will be considered and dealt with by our nominated representative, who may escalate the complaint internally within our organisation if the matter is serious or if necessary to resolve it.

Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the OAIC (Australia) or the Privacy Commissioner (New Zealand) whose contact details can be found at: <http://www.oaic.gov.au/> and <https://www.privacy.org.nz/>

**11 Changes to our Privacy Policy**

We may, from time to time, amend, modify or replace this Privacy Policy. You may obtain a copy of the current version of this Privacy Policy by contacting us. You should review our Privacy Policy each time you provide us with personal information.

**12 Contact us**

If you would like further information about the way we manage your personal information or if you have a complaint, please contact us at [compliance@tasmancargo.com](mailto:compliance@tasmancargo.com) or contact Mr. Cameron Leedman, our Data Protection Officer at [Cameron.Leedman@tasmancargo.com](mailto:Cameron.Leedman@tasmancargo.com).