

TTM Rail Privacy Policy

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Revision Control

Issue	Author	Reviewed	Approved
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1 Purpose

This Privacy Policy outlines TTM Rail's (TTM) obligations in respect of how we manage Personal Information. TTM adopts the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au.

2 Personal Information

Personal Information is information or an opinion that identifies an individual or contact. Examples of Personal Information we collect includes; clients or contacts' names, addresses, email addresses, phone, bank account numbers, and/or tax file numbers, among other details.

Personal information held by us as an employer, relating to an individual's current or former employment is not covered by the Australian Privacy Principles, but the APPs do apply to personal information about unsuccessful job applicants. This can include applicant's resumes, contact details and academic transcripts.

2.1 How and why we collect it

In most cases, we will collect information directly including:

- when individuals use our website,
- when we receive solicited or unsolicited communications from individuals, including on social media,
- when we conduct information sessions, hold events and other engagement activities,
- in any submissions, survey responses and other material we receive through our consultation activities,
- when we receive and investigate complaints, enquiries or information requests.

Personal Information is obtained in many ways including via; correspondence, telephone, email, in person, our website, from other websites, media, publications, or from other publicly available sources, and from third parties. TTM Rail does not guarantee website links or the policy of authorised third parties.

TTM Rail may collect Personal Information for the primary purposes of:

- carrying out its core business functions and activities,
- manufacturing, or delivering our products and services,
- providing information to clients, or other relevant individuals,
- conducting marketing and related activities,
- performing activities connected with Victorian and Commonwealth laws, or
- otherwise, where permitted by law.

Clients or contacts of TTM Rail may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

TTM Rail may also use Personal Information collected for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

When we collect Personal Information, we will, where appropriate and where possible, explain to the individual why we are collecting the information and how we plan to use it.

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2.2 Business Activity

TTM Rail may collect personal information when conducting its core business activities including:

- planning, developing, promoting and delivering our projects, products and services,
- engaging and consulting with industry contacts or major stakeholders about projects,
- working with industry to ensure we have the skilled workers needed to deliver projects,
- complying with reporting requirements, including advising and preparing reports and submissions to relevant parties,
- developing insights by analysing website and social media traffic to inform future engagement activities,
- considering, investigating and responding to enquiries, requests, applications or complaints about our activities, our contractors, or referring these enquiries, requests, applications or complaints to other relevant entities to assist the Company with its response,
- engaging in tasks to implement and manage its functions and activities effectively, efficiently and economically, including the operation of its website, social media channels, public consultations and other business programs,
- recruiting, training and managing staff or contractors and facilitating other internal administrative functions,
- exercising powers under relevant legislation (as applicable).

2.3 Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by TTM Rail only:

- for the primary purpose for which it was obtained
- for a secondary purpose that is directly related to the primary purpose
- with your consent; or where required or authorised by law.

3 Third Parties

Where reasonable and practicable to do so, we will collect Personal Information from individuals or contacts directly. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that the relevant party is made aware of the information provided to us by the third party.

4 Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- third parties where you consent to the use or disclosure; and
- where required or authorised by law.

5 Security of Personal Information

Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Any attempted misuse or security breach will be dealt with swiftly and with the utmost seriousness and individuals found to have contravened this privacy principle will be disciplined accordingly.

6 Access to your Personal Information

Clients or business contacts may access the Personal Information we hold about them and in order to update and/or correct it, subject to certain exceptions. If individuals wish to access their Personal Information, please contact TTM Rail in writing. TTM Rail may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from the individual requesting the personal information, before releasing the requested information.

7 Maintaining the Quality of your Personal Information

It is important to TTM Rail that Personal Information collected and stored is up to date. We will take reasonable steps to make sure that all Personal Information obtained is accurate, complete and up-to-date.

If individuals find that the information that TTM Rail has on them is not up to date or is inaccurate, we expect that the individual advises us directly in order to update our records and ensure we can continue to provide quality services and products to all clients and business contacts.

8 Unique Identifiers

TTM Rail limits its use of unique identifiers assigned by other organisations to circumstances where it is required to do so by law. One such instance is where we must collect the tax file numbers of employees.

TTM Rail will only assign unique identifiers to you if it is necessary to keep track of your interactions with our Company, to perform data analytics or to enable us to carry out our functions and activities efficiently.

9 Anonymity

TTM Rail respects individual's choices to remain anonymous and to interact with our Company anonymously where it is lawful and practicable for the individual to do so. However, sometimes it may not be possible for us to provide information, deal with a complaint or perform other functions unless we can identify who the enquirer is.

10 Transfer of your Information Outside Victoria

TTM Rail may use service providers which may store or process your information outside of Victoria, including overseas, and we take reasonable steps to ensure that its contractors do not handle any information transferred outside Victoria inconsistently and outside of the privacy principles.

In all other cases, we will obtain your consent before we transfer any of your information to another State or jurisdiction.

11 Policy Updates

This Policy may change from time to time and may also be uploaded on to the Company website.

12 Privacy Policy Complaints and Enquiries

If you have a concern or a complaint about how TTM Rail has handled your information, please contact us via email at admin@ttmrail.com.au.

If you are dissatisfied with the outcome, you may then escalate the matter to the relevant regulator on 1300 006 842 (1300 00 OVIC) or by email at enquiries@ovic.vic.gov.au.