

Silver Service Privacy Policy

1. About this Privacy Policy

1.1 Silver Service has implemented this Privacy Policy to provide information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 15.

1.2 We are related to other companies and entities in the A2B Australia Limited Group (**related entities**). This Privacy Policy applies to the collection and use of your Personal Information by us and by those related entities. This Privacy Policy may also be presented under the brands of those related entities. A reference in this Privacy Policy to us is also a reference to those related entities.

2. Personal Information

2.1 "**Personal Information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

3. What Personal Information do we collect and hold?

3.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information that we collect may include (but is not limited to) the following:

- (a) name
- (b) age and/or date of birth
- (c) contact details including telephone numbers (landline and/or mobile)
- (d) current and previous address (including postal address)
- (e) email address
- (f) gender
- (g) identification information such as driving licence details, including driving licence number
- (h) certification information such as taxi registration number, taxi plate number and taxi operator certification details
- (i) trip details (including start and end location, and fare) collected by our products such as payment terminals

- (j) payment details, such as your credit card, debit card or bank account details
- (k) Medicare details including individual reference number
- (l) occupation and employment details including employment status and any previous work experience
- (m) information from or in connection with your resume or job application if you apply for a position with us
- (n) emergency contact details
- (o) geographical location
- (p) Australian Business Number (ABN)
- (q) credit history
- (r) trade references, credit references or reports from a third party
- (s) credit information
- (t) criminal record as well as other disciplinary action and history
- (u) passport and visa details
- (v) photographs and/or images of you from camera footage, and
- (w) information from social media accounts and profiles.

3.2 We collect and record Personal Information about individuals such as:

- (a) our customers, potential customers and their representatives
- (b) our investors and shareholders
- (c) our suppliers and potential suppliers and their representatives, directors, partners, proprietors and shareholders
- (d) contractors and subcontractors and potential contractors and subcontractors and their representatives in relation to providing goods and services to us
- (e) drivers and operators of vehicles, in relation to information about the trips taken when logged into our products such as dispatch equipment and payment terminals
- (f) other individuals who may use our products and services (for example, individuals who have digital passes provided to them by their employer or someone they know)
- (g) our employees past and present, including applicants, and
- (h) any other person who comes into contact with Silver Service.

3.3 We are authorised to collect tax file numbers (TFNs) by the *Income Tax Assessment Act 1936 (Cth)*. It is not compulsory for you to provide your TFN for our products and services, but if you do not, taxation law may require additional deductions to be made from amounts payable to you.

4. How and when do we collect Personal Information?

4.1 We collect your Personal Information to allow us to conduct our business and organisational functions, to provide, market and sell our products and services and for the specified purposes set out in paragraph 6. In some circumstances the collection of Personal Information may be required by law.

4.2 We may collect your Personal Information in the course of providing you with goods or services, or:

- (a) when you make a booking (online, through our mobile application, or by calling our contact centre)
- (b) when you otherwise use or buy our products or services, including for the purposes of sending you products or services under an order (e.g. digital payment products)
- (c) when a third party purchases products or services for you to use
- (d) when you provide us, or you offer or apply to supply us, with goods or services
- (e) when you provide information to us in any way (including by completing a form, disclosing information over the phone, via email, fax or post, or providing us a business card)
- (f) when you are driving a vehicle and logged into one of our payment terminals, we receive information about the trips taken (including fare details)
- (g) when you request information about us, our products or our services
- (h) when you provide feedback to us
- (i) when you visit or fill in a form on our Website (see paragraph 5)
- (j) when you register for or use an account or subscription package on our Website or through our mobile applications, including for the purposes of enabling us to contact you in relation to your account
- (k) when you visit premises from which we operate
- (l) when you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our business operations
- (m) when you apply to set up an account with us (including a commercial credit account, Cabcharge Plus corporate account, Taxi operator account or Taxi driver account)
- (n) when you otherwise seek to set up an agreement with us (e.g. plate owner management agreement, vehicle lease, short-term loan and insurance loan)
- (o) where we prepare insurance and insurance premium funding paperwork for you

(p) where it is required for the purposes of assessing, approving or on boarding merchant partners, or

- (q) when you submit a job application to us
- (r) when you as a passenger make a lost property request to us, for the purposes of processing the relevant request
- (s) when you otherwise contact us by telephone, fax, email, social media, post or in person
- (t) where we are otherwise required or authorised by law to do so.

4.3 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect Personal Information directly from the relevant individual where reasonable and practicable.

4.4 We may also collect Personal Information about you from third parties and other sources such as:

- (a) your nominated representatives (eg spouse, accountant, power of attorney, brokers and other professional advisors)
- (b) our share registry service provider
- (c) third parties who purchase our products and services for you, such as when a customer purchases a Cabcharge eTicket for you to use or when your employer has an account with us and purchases a Cabcharge eTicket for you to use
- (d) if you are a taxi driver, from your taxi operator
- (e) publicly available sources of information
- (f) related entities, companies and businesses of Silver Service
- (g) if required by regulatory bodies
- (h) government departments and information providers, such as the Department of Immigration and Citizenship (Vevo check) and Service NSW (Driving records)
- (i) other commercial credit providers, or
- (j) credit reporting bodies who provide information about commercial credit worthiness,

but we will generally only collect your Personal Information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.

4.5 If the Personal Information we collect includes sensitive information, including health information, we will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.

- 4.6 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.
- 4.7 In some cases we are required to collect Personal Information under relevant state and federal legislation. For example:
- (a) where we are entering into credit arrangements;
 - (b) to verify the identity of taxi drivers under the relevant State personal transport regulations; and
 - (c) video recording inside taxis for security purposes.
- 4.8 If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information we require, we may not be able to provide you with any, or part of, the requested information, products or services, or to effectively conduct our relationship with you. Taxi drivers or operators who do not provide required Personal Information may not be able to receive their payments.

5. Information collected via our Website and applications

- 5.1 Personal information may be collected by us and by our third party service providers who assist us in operating our applications or our websites including but not limited to those at:

<https://www.a2baustralia.com/>
<https://www.cabcharge.com.au/>
<https://www.silverservice.com.au/>
<https://13cabs.com.au/>
<https://spotto.com.au/>
<http://www.giraffepayments.com.au/> and
<http://mtidispatch.com/>,

including their subdomains and any other website we operate from time to time (collectively the **Website**).

- 5.2 We may use various technological methods from time to time to track the visiting patterns of individuals accessing our Website or using our applications, including but not limited to the methods set out in this paragraph 5.

Google Analytics

- 5.3 We use Google Analytics to help analyse how you use our Website. Google Analytics generates

statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Website. Google will store this information. We will not use Google Analytics to track or to collect any personally identifiable information of visitors to our Website. We will not associate any data gathered from this Website with any Personal Information from any source as part of our use of Google Analytics.

- 5.4 If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Click Stream Data

- 5.5 When you read, browse or download information from our Website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. This information is used for statistical, reporting and website administration, maintenance and improvement purposes.

Cookies

- 5.6 Our Website may use 'cookies' from time to time. Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our Website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our Website.
- 5.7 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our Website or click-through to our Website from a link in an email we send you, a cookie may be downloaded onto your computer's hard drive.
- 5.8 Cookies may also be used for other purposes on our Website.
- 5.9 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check

the "Help" menu of your browser to learn how to change your cookie preferences.

- 5.10 If you disable the use of cookies on your web browser or remove or reject specific cookies from our Website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Web Beacons

- 5.11 Web beacons are images that originate from a third party site to track visitor activities. We use web beacons to track the visiting patterns of individuals accessing our Website.

Session recording software

- 5.12 We may use session recording and replay software tools, such as Fullstory, to record information about a user's interactions on our Website or applications exactly or as close as possible to how the user actually experienced it, including information such as mouse movements, clicks, typing, scrolling, swiping, and tapping. We use this information to debug errors, optimise pages, enhance the user experience and support customers. We do not generally use this information to identify individuals, though such session information may become Personal Information; for example, if we identify a particular session in the context of a customer support call.

Third party content (eg social media links)

- 5.13 Some of the content on our Website includes applications made available by third parties, such as social media buttons or links that allow you to share content or links to our Website through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

6. How do we use your Personal Information?

- 6.1 We use the Personal Information we collect about you for our business and organisational functions and activities, in order to operate our business

efficiently, and to market our products and services for the benefit of our customers.

- 6.2 We may collect, hold and use your Personal Information:

- (a) to facilitate bookings (online, mobile application or via our call centre)
- (b) to identify and communicate with you
- (c) to enable us to provide you or a third party you nominate with requested information, products or services
- (d) to otherwise assist customers by providing them with information and support
- (e) to collect and process payments
- (f) to help us to manage and enhance products or services we provide to you
- (g) to help us to manage and enhance goods and services we procure from our suppliers and subcontractors
- (h) to help us manage and respond to a general or specific shareholder enquiry
- (i) to process share applications and service shareholders' needs
- (j) to provide facilities and services a shareholder may request
- (k) to carry out appropriate administration in relation to our shareholders and our share registry
- (l) to personalise and customise your experiences on our Website
- (m) to facilitate, manage and administer any account you may hold or seek to hold with us (e.g. corporate accounts, taxi operator and driver accounts)
- (n) to facilitate any other agreements which involve us, or in which we have a commercial interest in (e.g. plate owner management agreements, vehicle leases, short-term loans and insurance loans)
- (o) to manage and maintain credit accounts for the provision of products or services on credit
- (p) to carry out, or request a third party to carry out on our behalf, credit checks as well as credit reporting where you or your business are seeking to use a credit facility
- (q) to carry out checks on the Personal Property and Securities Register (PPSR) (which may involve a disclosure to the PPSR operator) to confirm your business' details including ACN or ABN where you have applied for credit
- (r) to carry out debt and equipment recovery functions
- (s) to promote and market our products and services to you
- (t) to provide you with information that we believe may be of interest to you or that you

may be interested in receiving, including advertising material, regarding us, our clients, and our business partners

- (u) to conduct research for the purposes of improving existing products or services or creating new products or services
 - (v) to help us research the needs of our customers, including by de-identifying the information or undertaking data analytics, to enable us to understand our database and to market our products and services with a better understanding of your needs and the needs of customers generally
 - (w) to analyse our shareholder base and for product development and planning
 - (x) to notify and assess insurance claims, pay settlements and finalise claims, and determine liability
 - (y) to protect you and us from fraud
 - (z) to provide for the safety and security of workers and onsite visitors
 - (aa) to help us manage our business operations
 - (bb) for business support purposes including maintenance, backup and audit
 - (cc) to process any job application submitted by you
 - (dd) to process any lost property requests submitted by you
 - (ee) to respond to any queries or complaints you may have, or
 - (ff) to comply with our statutory and legal obligations.
- 6.3 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.
- 6.4 We may aggregate Personal Information of our customers for reporting and statistical purposes, for business improvement and for marketing purposes. This allows us to better inform ourselves of our customers' preferences and requirements, and to enable us to monitor the effectiveness of and constantly improve our Website and our products and services. If we disclose any aggregated, demographic or de-identified information to third parties it will not contain any Personal Information.
- 6.5 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.
- 6.6 We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Policy or any agreement you enter into with us, or
- (b) required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.

7. When do we disclose your Personal Information?

- 7.1 Silver Service may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraph 6. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).
- 7.2 We may also disclose your Personal Information to:
- (a) any of our internal divisions, business units or departments
 - (b) your nominated representatives
 - (c) vehicle operators, in respect of information such as whether you are an authorised driver, levies, account work, log on/ log off details and information from our payment terminals about trips undertaken by the drivers of the operators' vehicles
 - (d) other organisations or individuals who assist us in providing products and services to you
 - (e) professional service providers and advisors who perform functions on our behalf, such as lawyers
 - (f) medical providers including medical and rehabilitation practitioners for assessing insurance claims
 - (g) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, data analytics, printing, mailing, marketing, planning and product or service development)
 - (h) credit reporting bodies and mercantile reporting agencies (e.g. Equifax)
 - (i) debt collecting agencies
 - (j) other entities who are your credit providers or trade suppliers
 - (k) banks, lenders, valuers, insurers, brokers, auditors, business consultants and IT service providers, in connection with products or services that those parties provide to us, and
 - (l) Government, regulatory authorities and other organisations as required or authorised by law (such as Centrelink, ASIC and the police).

7.3 We may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

7.4 As we continue to develop our business, we may buy, merge or partner with other companies or businesses, and in so doing, acquire customer information. In such transactions, Personal Information may be among the transferred assets. Similarly, in the event that a portion or substantially all of our business or assets are sold or transferred to a third party, we may also disclose customer information including your Personal Information to a purchaser or potential purchaser in connection with the sale or potential sale of us, our business or any of our assets, including in insolvency.

8. Overseas disclosures

8.1 We are a national organisation and may collect, use and disclose Personal Information generally within Australia (including between states and territories). Generally, we do not send or disclose your Personal Information to overseas recipients. However, in future there may be certain circumstances in which some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. For example, this may happen if:

- (a) our offices or related entities are overseas
- (b) we outsource certain activities overseas
- (c) transactions, information, services or products have an overseas connection, or
- (d) our computer systems including IT servers are located overseas.

8.2 You consent to the collection, use, storage, and processing of your Personal Information outside of Australia as set out in this Privacy Policy.

8.3 In particular, your Personal Information may be disclosed to third parties outside Australia in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy.

9. Other uses and disclosures

9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect or use your Personal Information.

10. Marketing

10.1 You consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.

10.2 If you do not want to receive marketing information from us, you can unsubscribe in any of the following ways:

- (a) clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us
- (b) logging into your account on the Website or mobile application and editing your communication preferences, or
- (c) contacting us using the contact details specified in paragraph 15.

11. Storage and security of Personal Information held by us

11.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our Website or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption etc) and procedural methods.

11.2 If we find that we no longer require (including for our internal record-keeping and compliance purposes) or have no further need for your Personal Information we may de-identify it or remove it from our systems and destroy all record of it.

12. You can access and update your Personal Information

12.1 You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. Depending on the nature of the request, Silver Service may charge for providing access to this information, however such charge will not be excessive. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.

12.2 Generally, you can access and correct some of your Personal Information through the Website, mobile applications or other web-based application made available to you by either filling out the relevant online form or logging into your account and updating or editing your profile at any time. Alternatively, a request for access can be made by contacting our Privacy Officer in any of the ways specified in paragraph 15.

12.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.

12.4 A request for correction can be made by contacting the customer services team (or in the case of drivers, the driver services team), the details of which will be displayed on the Website. Alternatively, please contact us as set out in paragraph 15 if you believe that the Personal Information is inaccurate, incomplete or out of date. We will use all reasonable efforts to correct the relevant Personal Information.

12.5 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

13. How do we deal with complaints about privacy?

13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy, please contact our Privacy Officer in any of the ways specified in paragraph 15 and advise us as soon as possible. We will investigate your queries and privacy complaints within a reasonable period of time depending on the complexity of the complaint.

13.2 We will notify you of the outcome of our investigation.

14. Updates to this Privacy Policy

14.1 We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy, posted on our Website (as set out in section 5.1) where the Privacy Policy will be located. Any changes to this Privacy

Policy may be advised to you by updating relevant pages on our Website. We encourage you to check these pages from time to time for any changes.

15. What to do if you have a question, problem or want to contact us about our use of your Personal Information or this Privacy Policy

15.1 Please contact our Privacy Officer at privacy@13cabs.com.au if you:

- (a) have a query or concern about this Privacy Policy or our Personal Information handling processes
- (b) wish to make a complaint in relation to a breach of your privacy
- (c) would like to access your Personal Information held by us
- (d) would like to opt out of direct marketing, or
- (e) would like to update or correct your Personal Information held by us.

This Privacy Policy was last updated on 13 March 2020.