

# PRIVACY POLICY

Approved 22 July 2016

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## 1. INTRODUCTION

- (a) Redflex Holdings Limited and its subsidiaries (**Redflex**) collect, hold, use and disclose personal information about individuals in order to conduct its businesses and meet its legal obligations. Redflex is committed to respecting and protecting the privacy of individuals and entities, as well as complying at all times with the requirements of the *Privacy Act 1988* and the Australian Privacy Principles set out in the Act ("**Privacy Law**").
- (b) This Policy details how Redflex handles, uses, manages and discloses personal information relating to individuals, however obtained. In this Policy **personal information** means information about, or an opinion of, an identifiable individual (or an individual who can be reasonably identified) whether or not that information or opinion is true or in a material form.

## 2. WHO IS COVERED BY THIS POLICY

- (a) This Policy covers all directors, executives, employees, contractors and, by way of contract, commercial intermediaries who work for or are engaged by Redflex in any capacity and for any duration.
- (b) Employees are expected to observe this Policy (as varied from time to time) as applicable to employees. However, this Policy does not:
  - (i) form part of the terms of an employee's employment and it cannot be enforced by any employee as a contractual promise; or
  - (ii) give rise to any expectation of a particular outcome or decision on any matter arising under or pursuant to this Policy.

## 3. SCOPE OF THE POLICY

- (a) All persons to whom this Policy applies are expected to comply with this Policy at all times.
- (b) Breaches of this Policy by employees will be treated seriously and may lead to workplace disciplinary action up to and including termination of employment. For a non-executive director, if there is any breach of this Policy the non-executive may be asked to resign. For commercial intermediaries, if there is any breach of this Policy this may lead to the engagement being terminated.

## 4. RESPONSIBILITY FOR IMPLEMENTATION OF THE POLICY

- (a) The Group General Counsel & Company Secretary has overall responsibility for the effectiveness of this Policy and is also responsible for monitoring and reviewing the operation of this Policy and making recommendations for changes to minimise risks to the operations of Redflex.



- (b) All persons to whom this Policy applies are responsible for their own compliance with this Policy and for ensuring that the Policy is consistently applied.
- (c) All persons to whom this Policy applies should ensure that they take the time to read and understand this Policy.
- (d) Any contraventions of this Policy should be reported to the Group General Counsel & Company Secretary, using the incident reporting function of RiCIR (Redflex' electronic Risk & Compliance and Incident Reporting tool) or via the whistle blower or ethics hotline.
- (e) Questions regarding the content or application of this Policy should be directed to the Group General Counsel & Company Secretary.

## 5. COLLECTION OF PERSONAL INFORMATION

### (a) Kinds of personal information collected and held

- (i) The types of personal information which Redflex collects and holds include, without limitation, an individual's name, contact details, bank account details, credit history and employment details (if applicable). Redflex holds and collects such kinds of personal information to allow Redflex to carry on its business and meet its legal obligations and for the purposes set out in paragraph 5(c) of this Policy.
- (ii) In addition, Redflex collects and uses "sensitive information" in relation to certain individuals, for example, details of criminal records.
- (iii) Redflex requires this information in order to carry on its business and meet its legal obligations under certain customer contracts.

### (b) How personal information is collected

- (i) Redflex collects and holds personal information on various individuals, including but not limited to its customers, suppliers, employees, contractors and commercial intermediaries. This information is collected in different ways including in meetings, by email, criminal background checks, over the telephone and/or within written documentation including legal contracts.
- (ii) Wherever possible, Redflex tries to only collect personal information directly from the individual. However where Redflex requires personal information to be obtained from third parties or indirectly (for example independently verified criminal background checks), then Redflex will ensure that the relevant individual's consent is obtained to that sourcing and that the individual is aware of the purposes for which that information is to be collected, held and disclosed (as applicable).



**(c) Purposes for which personal information is collected, held, used and disclosed**

Redflex collects personal information for the primary purpose of normal business practices and operation, including to carry out its legal, regulatory, contractual and administrative obligations and requirements. In addition, Redflex may from time to time collect personal information for the secondary purpose of research and development, testing and provision of general data to regulatory bodies where it is required or requested to do so pursuant to legal, regulatory or contractual obligations.

**6. HOLDING OF PERSONAL INFORMATION**

Redflex predominantly holds personal information in an electronic format, although where required, it may transfer or receive the information into hard copy format. Redflex has specialised electronic systems, cloud software and encryption software to protect the security of personal information and sensitive information. Access to such systems and software is only by authenticated and/or authorised users and groups. Where information is transferred into, or received in, hard copy, Redflex protects that information from unauthorised access, modification and/or disclosure by storing it in locked filing cabinets and only allowing approved persons with access to the required personal and sensitive information. All personal information and sensitive information which is no longer required by Redflex is destroyed – either by shredding (hard copy) and/or securely destroyed with a certificate of guarantee (electronic copy).

**7. USE AND DISCLOSURE OF PERSONAL INFORMATION**

**(a) General**

Redflex uses or discloses personal information only for the purpose or purposes for which such information has been collected unless:

- (i) the use and/or disclosure is directly related to Redflex' purpose for obtaining that information;
- (ii) the individual affected would reasonably expect Redflex to use and/or disclose the information for that purpose;
- (iii) prior written consent to the usage and/or disclosure has been obtained by the individual; or
- (iv) the use and/or disclosure is directed by a Court of law in Australia, is permitted under Privacy Law or the ASX Listing Rules.

**(b) Marketing**

Redflex does not actively engage in direct marketing activities to consumers. To the extent that Redflex decides to do so in the future, individuals may at any time request Redflex not to provide them with any direct marketing communications by contacting Redflex at the address below.



**(c) Third parties**

Redflex will share personal information collected or held by it with its subsidiaries based in the United States. In addition, Redflex will share certain personal information (including sensitive information) with third parties where required by Redflex to meet its legal obligations. Where Redflex shares personal information with unrelated third parties (unless an exception applies), Redflex will obtain the express consent of the relevant individual to the disclosure of personal information in this manner. In addition, Redflex uses a number of service providers contractors and commercial intermediaries to whom it discloses personal information. Redflex enters into written contracts to protect this personal information, including requirements for the third party to use or disclose information only for the purposes of the contract and additional special privacy requirements where necessary.

**8. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

It is important to Redflex that the personal information that it collects is accurate, complete and up to date. Under Privacy Law, individuals are entitled to access and/or correct their personal information. During their usual business relationships, Redflex asks individuals to contact Redflex at any time to update or correct their personal information. Individuals can also request access to or correct their personal information by contacting Redflex at the below address. Redflex will ask for confirmation of identity and authority before access to information is given or corrected. Where possible, Redflex allows individuals to interact with it anonymously or using a pseudonym. For example, general enquiries do not require any personal information unless Redflex needs it to adequately answer an individual's queries. However, for the most part Redflex' functions and activities usually require personal information including enough information about the particular matter to enable Redflex to fairly and efficiency interact with its customers and other stakeholders.

**9. COMPLAINTS**

**(a) Complaints to Redflex**

If an individual wishes to contact Reflex regarding his or her personal information including where he or she believes that Redflex is in breach of this privacy policy, then Redflex may be contacted at the following address:

**Email:** [privacyofficer@redflex.com.au](mailto:privacyofficer@redflex.com.au)

**Telephone:** +61 3 9674 1712

**Address:** **Company Secretary**  
Redflex Holdings Limited  
31 Market Street  
South Melbourne 3205  
Victoria, Australia

All complaints must be in writing and must contain sufficient detail to allow Redflex to consider and respond. Upon consideration of the complaint, Redflex will determine what (if any) action needs to be taken. Redflex aims to respond to complaints on this privacy policy within 30 days.



**(b) Escalated Complaints**

If an individual is not satisfied with Redflex’s response, he or she is entitled to complain to the Privacy Commissioner at the Office of the Australian Information Commissioner. The Commissioner’s contact details are: 1300 363 992 or [www.oiac.gov.au](http://www.oiac.gov.au).

**10. REVIEW OF POLICY**

- (a) Redflex will review this Policy periodically to ensure it complies with applicable legal requirements and remains relevant and effective.
- (b) This Policy is not intended to be contractual in nature.
- (c) Redflex may change this Policy at any time.