

TRANSPORTME PTY LTD – PRIVACY POLICY

Transportme Pty Ltd (ABN 47163798641) (**we, us or our**), understands that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, when interacting with you.

The information we collect

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

The types of personal information we may collect about you include:

Where you are a client of ours (such as an operator using our software):

- **Identity Data** including your personnel's name and job position.
- **Contact Data** including your personnel's telephone number, address, depot address and email.
- **Financial Data** including bank account and payment card details (through our third party payment processor, Stripe, who stores such information and we do not have access to that information).
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Profile Data** including your personnel's username and password for Transportme, purchases or orders you have made with us, content you post, send, receive and share through our platform, and support requests you have made.

Where you are a driver managed by one of our clients:

- **Identity Data** including your name, driver's licence number, driver's licence expiry date, authority number, authority expiry date and geolocation data (see "Use of location services data" section below for more detail on the use of geolocation data).
- **Contact Data** including your telephone number, address and email.
- **Profile Data** including your username and password for Transportme, purchases or orders you have made with us, content you post, send, receive and share through our platform, and support requests you have made.

Where you are a user using our passenger mobile application

- **Identity Data** including your name.
- **Contact Data** including your email.
- **Profile Data** including your username and password for Transportme, content you send receive and share through our platform, and support requests you have made.
- **Sensitive information** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information. In the course of doing business with you, we may collect, or come across such sensitive information in different situations, including where an operator has left a note or comment regarding your specific needs.

Where you are a user accessing our website, an operator, driver or passenger using our software or mobile application

- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies or analytics), and communications with our website.
- **Interaction Data** including information you provide to us when you participate in any interactive features, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.

How we collect personal information

We collect personal information in a variety of ways, including:

- when you interact directly with us, including face-to-face, over the phone, over email, or online;
- when you apply for a job with us;
- when you complete a form, such as registering for any events or newsletters, or responding to surveys; or
- from third parties, such as details of your use of any website we operate (from our analytics and cookie providers and marketing providers. See the “Cookies” section below for more detail on the use of cookies).

Why we collect, hold, use and disclose personal information

Personal information: We collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our software, including to provide you with a login;
- to do business with you, including to allow you to access and track the live location of vehicles;
- to contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us;
- to contact and communicate with you about any enquiries you make with us via any website we operate;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you;
- to run promotions, competitions and/or offer additional benefits to you;
- if you have applied for employment with us, to consider your employment application; and
- to comply with our legal obligations or if otherwise required or authorised by law.

Sensitive information: We only collect, hold, use and disclose sensitive information for the following purposes:

- any purposes you consent to;
- the primary purpose for which it is collected, to provide our Transportme software and mobile application to you;
- secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the below listed third parties as reasonably necessary to do business with you;
- to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent; and
- if otherwise required or authorised by law.

Our disclosures of personal information to third parties

Personal information: We will only disclose personal information (excluding sensitive information) to third parties where it is necessary as part of our business, where we have your consent, or where permitted by law. This means that we may disclose personal information (excluding sensitive information) to:

- where you are a user of our passenger mobile application, to the operator of the public transport fleet;
- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as Amazon Web Services (**AWS**), Firebase and Mailgun;
- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators or processors such as Stripe;
- our existing or potential agents or business partners;
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser’s advisers and may be among the assets transferred;

- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as analytics providers and cookies; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Sensitive information: We may disclose sensitive information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers;
- professional advisors;
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred;
- ;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as analytics providers and cookies; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure

We store your personal information in Australia. Where we disclose your personal information to third parties, those third parties may store, transfer or access personal information outside of Australia. We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to do business with you.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies and Analytics

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Google Analytics: We may use Google Analytics Advertising Features. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together. These cookies and identifiers may collect Technical and Usage Data about you.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

To find out how Google uses data when you use third party websites or applications, please see [here](#).

Facebook/Meta Analytics: We may use tools provided by Meta, such as the Meta Pixel, advanced matching, and Conversions API. These allow us to measure ad performance and deliver ads that may be relevant to you on Meta platforms based on your activity on our website/app. You can control whether we can join data from third party partners with your Meta account ads by adjusting your preferences within Meta's settings. You can disconnect this data from your Meta account by changing your settings for [Off-Facebook activity](#). For more information, please see Meta's Privacy Policy [here](#).

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Personal information from single sign-on accounts

If you connect your account with us using a single sign-on account, such as Apple, Facebook or Google, we will collect your personal information from the single sign-on provider. We will do this in accordance with the privacy settings you have chosen with that provider.

The personal information that we may receive includes your name, ID, user name, handle, profile picture, gender, age, language, list of friends or followers and any other personal information you choose to share.

We use the personal information we receive from the single sign-on provider to create a profile for you on our platform.

Where we have accessed your personal information through your Facebook account, you have the right to request the deletion of personal information that we have been provided by Facebook. To submit a request for the deletion of personal information we acquired from Facebook, please send us an email at the address at the end of this Privacy Policy and specify in your request which personal information you would like deleted. If we deny your request for the deletion of personal information, we will explain why.

Use of Google API Services (this section applies to personal information accessed through Google API Services)

We use Google's Application Programming Interface (API) Service to track your location and enable you to access vehicle location in real time in relation to your location.

Our use of information received from Google APIs will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements (set out in the Google API Services User Data Policy).

We limit our use of the personal information that we collect to providing or improving our business. We do not use the personal information for any other purposes.

We only transfer the personal information to others if it is necessary to provide or improve our business or as necessary to comply with applicable law or as part of a merger, acquisition or sale of assets where we notify you of this.

We do not use or transfer the personal information for serving ads, including retargeting, personalised or interest based advertising.

We don't allow humans to read the personal information unless

- we have first received your consent to view specific messages, files or other data;
- it is necessary for security purposes (such as investigating a bug or abuse);
- our use is limited to internal operations and the personal information (including derivations) have been aggregated and anonymised.

These restrictions apply to the raw data we obtain from the restricted scopes and data that is aggregated, anonymised or derived from them.

We have policies and procedures in place setting out appropriate safeguards for protecting your personal information obtained with the Google APIs. We will also ensure that our employees, agents, contractors and successors comply with the Google API Services Data Policy.

Use of location services data

We collect your precise or approximate location via our Transportme software and/or mobile application for the following purposes:

- where you are an operator, to enable you to track vehicle locations of your drivers;
- where you are a passenger, to allow you to access vehicle location in real time;
- for security and safety;
- to prevent and detect fraud; and
- as permitted by law.

We collect this information when you do business with us, when you or a passenger enable our mobile application to use your device's location services and when our mobile application is open (whether on-screen or not). If you do not want us to use your location for the purposes above, you should turn off the location services in your account settings in the mobile application or in your mobile phone settings. If you do not provide geolocation data to us, it may affect our ability to do business with you.

Data Protection and Security: Where we use service providers who provide AI Technologies to us, we will take reasonable steps to ensure that such service providers handle your personal information according to privacy law, including by ensuring that we have contracts in place requiring the service provider to protect personal information.

We will not input your personal information into any platform provided by an AI Technology service provider which then trains its model based on that information.

Your Rights and our Commitments: We will treat information generated or inferred by the AI Technologies about individuals as personal information and you maintain all rights over your personal information as outlined in this privacy policy, regardless of whether AI Technologies are used in processing. When using AI Technologies with your personal information:

- **Transparency and control:** we will inform you when AI Technologies are being used to make decisions that may significantly affect you. We will implement processes to verify the accuracy of AI-generated outputs and we will take reasonable steps to maintain human oversight and review of significant AI-generated decisions. Our staff are trained to understand the limitations of AI systems and verify outputs before they are relied upon; and
- **Security:** we implement appropriate technical and organisational measures to ensure that our use of AI Technologies maintains the security and integrity of your personal information. This includes regular testing and monitoring of AI outputs for accuracy and reliability; and
- **Risk mitigation:** We regularly assess and document the risks associated with our use of AI Technologies in processing personal information and implement appropriate mitigation measures. This includes ongoing monitoring of AI Technologies and regular reviews of their performance and impact.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

Transportme Pty Ltd (ABN 47163798641) Email:

support@transportme.com.au

© [LegalVision LLP Pty Ltd](#)