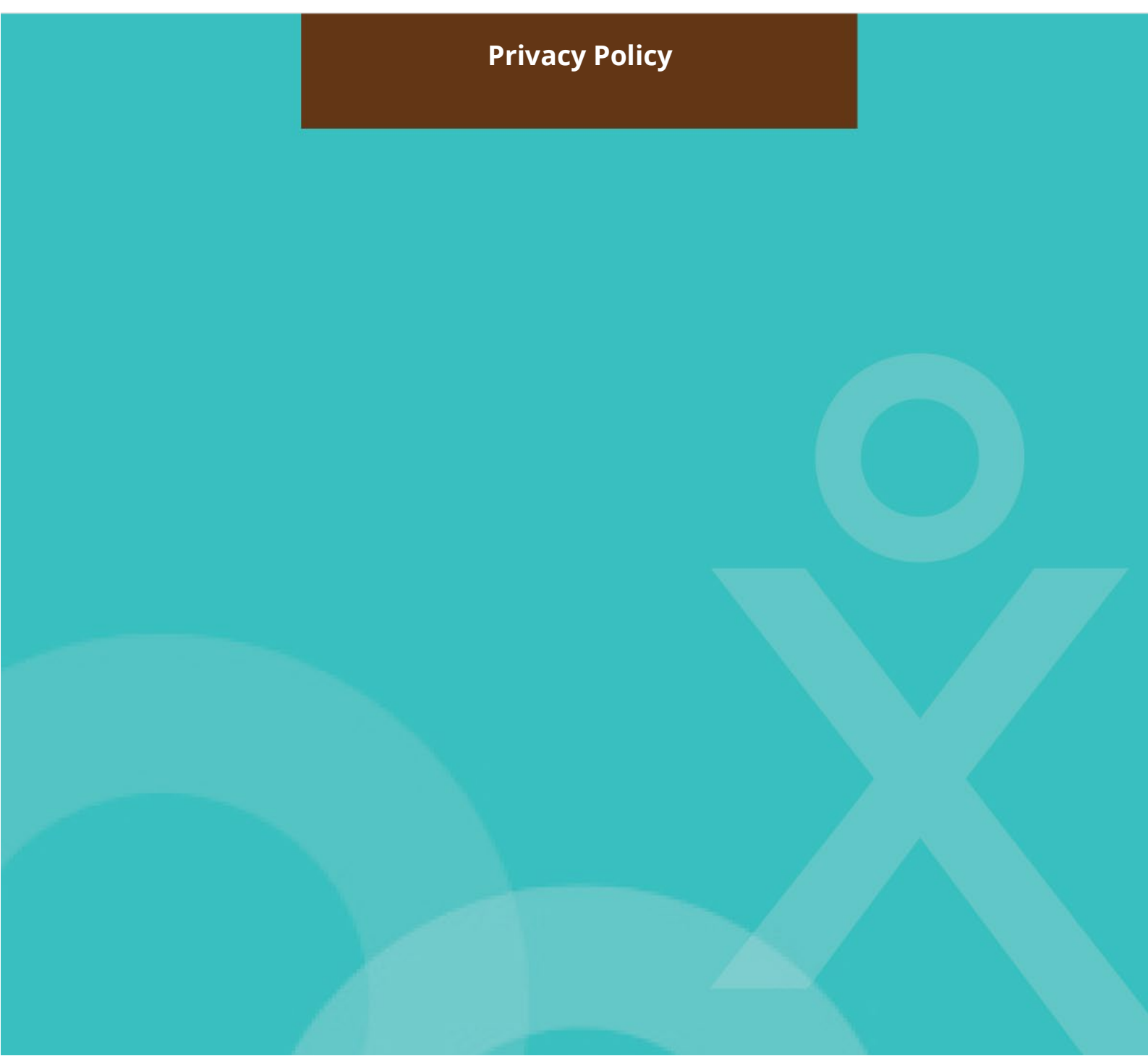




Privacy Policy



Confidential information

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1. Privacy Policy

Modaxo Asia Pacific, Middle East and Africa (**Modaxo APMEA**) is a global public transport and emergency services technology leader located in Brisbane, Australia. In this policy, "we", "us", "our", "ours" refers to Trapeze Group Asia Pacific Pty Ltd ACN 010 832 318, Corvanta trading as Trapeze Group Asia Pacific Pty Ltd, and Trapeze Rail Pty Ltd ACN 127 510 810 and its subsidiaries (collectively known as "Modaxo APMEA") and are references to the entity responsible for the processing of your personal information, which generally is the entity that obtains your personal information as well.

This Privacy Policy applies to the personal information we obtain through the Modaxo entities, be it through the delivery and application of its products and services, through its online properties including websites and social media pages ("**Online Sources**") and its offline collection methods including, in connection with sales, marketing, partner and supplier engagement and third-party sources (collectively referred to as "**the Sources**"). This Privacy Policy does not apply to personal information obtained from our current and former employees or to products or services that post separate privacy policies.

This Privacy Policy describes the types of personal information that we obtain through the Sources, how we may use that personal information and with whom we may share it and how you may exercise your rights regarding our processing of the information. The Policy also describes the measures we take to safeguard your personal information that we obtain and how you can contact us about our privacy practices.

The Online Sources may provide links to other third-party websites and features or contain third-party cookies that are not owned or controlled by Modaxo. Please review the privacy policies of these third parties to familiarise yourself with their practices.

2. Consent

This Privacy Policy sets out our dealings with its personal data holdings. Where we propose to use the personal data for a purpose different to that set out in this policy or, where we propose to provide the personal data to a non-disclosed third-party, we will endeavour to first obtain your express consent. If, in these instances, you do not provide your consent, we will not use or disclose the personal data accordingly.

If you do not agree with the terms of this Privacy Policy, please do not access our website, use our services, or provide any information about yourself to us.

3. Changes That We Make to Our Privacy Policy

We may update this Privacy Policy from time to time, with the updated Policy being promptly posted on our website. We recommend that you revisit the Privacy Policy on a regular basis.

4. Collection of Your Personal Information by Third Parties

This Privacy Policy does not apply to any third-party links which may also collect and use information about you. We are not responsible for any of the information collected by any such third party.



5. What Personal Information Do We Collect?

The usual types of personal data we collect and deal with can include:

- **Contact Information** (such as names, phone numbers, email, and postal addresses for you or for others (e.g., directors or executives in your business);
- **Identification data**, such as your gender, job title, photographs and date of birth, marital status and dependent, spousal and other family information;
- **Recruitment-related information** – such as your name, email address, location, telephone number, qualifications, employment history, interests, types of roles you are interested in, your work application form and resume or CV. If you progress through the interview process, we may also collect interview notes, references, results of any psychometric tests and background checks (including criminal records checks), your work visa and other information to verify your identity and right to work;
- **Usage information** – information we collect when you use our websites or web-based products, such as server log information (your IP address, browser type, operating system, browser language, time zone, access times and any referring addresses) and location information;
- **Financial information** (such as payment information, including name, billing address and payment card details (i.e., card number, expiration date and security code); bank account information; financial statements; income; and credit score);
- **Contact information** you provide about friends or other people you would like us to contact;
- **Inferences about you**, including about your preferences;
- **Clickstream data** and other information about your online activities (such as information about your devices, browsing actions and usage patterns), including across the Online Sources and third-party websites, that we obtain through the use of cookies, web beacons and similar technologies; and
- **Other personal information** contained in content you submit to us (such as through our “Contact Us” feature).

We will only use these contact details for the purpose of advising you as to whether our services can assist you. We will not use the contact details for any other purpose, and neither will we provide the details to third parties without your express consent.

6. Health Related Data

Several of our products and services may result in the collection of personal information that is reasonably capable of identifying the individual which might also include your health or other sensitive information. The collection of this information is necessary for us to provide these services. It is the preference of Modaxo that this information is stored in an encrypted storage facility managed by our clients for which the information is collected on their behalf. There may be limited scenarios where we are required to hold and store this information on our client's behalf.

7. Payment Data

We collect and processes payment information as part of the provision of our services. Payments are generally made when a client receives our invoice. When clients provide payment information to us, they will usually provide the payment information of their organisation.



There may be limited circumstances where personal payment information is provided to and processed by us (such as name on card, card type, amount purchased). This is the choice of the payee; our business preference is to use approved corporate accounts.

8. Client-Provided Data

We obtain and process personal data about our clients' employees, contractors and as necessary and appropriate, their customers as required in the delivery of our products and services. We do not source this information directly.

Client data is owned and controlled by the clients. The client retains control over our dealings with this data.

Children's personal data may be included in our client-provided data, and we deal with it to deliver our products and services.

9. Childrens Privacy

We do not seek personal data from individuals under the age of eighteen in the absence of parental consent. If we unintentionally gather personal information from an individual who is under the age of eighteen, we will delete the data unless we are advised otherwise. Our website is not intended to be used by anyone under the age of eighteen.

If you are a parent or guardian and become aware that your child has provided us with their personal data, please contact us.

10. Why Do We Collect

We process personal information to conduct our business – this includes managing our contractual relationships, recruitment, monitoring access to our websites and apps, managing safety and security risks, and complying with our legal obligations. We also process sensitive personal information where you have provided your consent, or it is necessary to comply with legal obligations.

11. Purpose of Collection

We may use the personal information that we obtain for a number of different purposes depending on the type of personal information collected and the context in which it was collected.

12. How Do We Use

The primary purposes for which we process personal information include:

- to provide and deliver our products and services;
- to provide customer support and ongoing service delivery of our products and services;
- to improve our products and services and process transactions;
- business-related purposes – this includes negotiating, managing, and fulfilling our contracts with customers, suppliers and third parties (including e-commerce transactions); managing business



relationships; administering real estate leases and licences; conducting clearance procedures; managing accounts and records; supporting corporate social responsibility activities; resource planning and workforce management; activities and operations; internal investigations; and debt administration;

- recruitment-related purposes – this includes considering you for career opportunities (including internship positions) with Modaxo and inviting you to participate in recruitment activities and events;
- website administration and internal operations – this includes troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- legal obligations – this includes meeting obligations imposed under law; responding to lawful requests from governments and public authorities; and responding to potential or actual litigation.

13. When Do We Disclose Your Personal Information

Please note that permitted transfer of personal information to third parties or other companies within Modaxo APMEA may include the transfer of data from one country to another and may include the transfer of data to a country where the laws provide different protection from the country.

Third party access to personal data

We do not sell the personal data we collect from third parties. We may share personal data with our affiliates, subsidiaries, employees, contractors, and agents in the course of providing a client business services, support, or the fulfilment or delivery of products or services. We may also disclose your information to a third party in connection with a corporate reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, products, stock in connection with any insolvency or similar proceedings.

We may also disclose personal data to third parties if we are authorised or required to do so under a law, domestic or international.

14. Personal Data Management

We securely store, accesses, and dispose of personal data we hold, as outlined below.

15. Security and Storage

We implement physical, procedural and technical security with respect to our offices and information storage facilities to safeguard against loss, misuse, unauthorised access, disclosure, or modification of personal data. This also applies to our destruction of personal data.

A core value is respecting the confidentiality of the personal data we hold and deal with. Only individuals who are authorised and trained to handle personal data are allowed to access it. Additionally, our computer systems are designed with security features that protect personal data when it is accessed internally or transmitted between our data processing facilities and corporate offices.

Personal information may be stored or processed in any jurisdiction in which we or our affiliates, suppliers, subsidiaries, or agents maintain facilities. While predominantly, personal data (including back-ups) is stored in Australia, other jurisdictions include: the USA, Canada, and the EU.

We cannot guarantee the protection of any personal information that you provide to a third-party website that is linked to our website. It is important for you to conduct your own research and investigation before clicking on any of these links.



16. Retention

We keep personal information only for as long as necessary to efficiently and effectively provide our products or services. After this, we will securely dispose of the personal data, unless there are legal requirements that mandate retention beyond this point.

17. Log Data

When using our products and services (including our website) we will collect information about you and about your use of our products and services, such as which services that you use and how you use them. We will collect information such as:

- **device information**, such as the model and ID of the device you use, operating system, telephone number and mobile phone network;
- **server log information**, such as details of how you used the products or services (including our website), IP address, hardware settings, browser type, browser language, the date and time of your use and referral URL;
- **your browser** or account using cookies; and
- **real time location information**.

18. Cookies

Website traffic information is analysed to inform products, services, or features that will be of interest to visitors, and to improve our website, products, services, features or other offerings.

We may analyse your use of our products and services generally, to improve those products and services and additionally, to bring other products and services to your attention which may be of benefit to you.

We collect and uses analytics and cookie data from your use of the website and our technologies to understand how you interact with our website.

Cookies are identifiers that can be sent from a website via your browser to your device's hard drive. You can elect not to accept cookies by changing the designated settings on your web browser; however, disabling cookies may prevent you from using certain functions and features of our website. Information collected from the use of cookies is used to improve our online services.

Web beacons - Web beacons are small, graphic images that enables us to monitor user activity on our website. A web beacon is a very small pixel which is invisible to the user. The information collected through web beacons is not of a personal nature.

Clickstreaming - Clickstreaming enables us to analyse the paths that visitors take as they access our website and navigate its pages, and potentially, link to other sites.

19. GDPR

For the purposes of all applicable EU legislation, references in this policy to 'personal information' shall also be read as 'personal data' and Modaxo APMEA is the 'controller' in relation to your personal information for information collected on behalf of Modaxo APMEA.



Modaxo APMEA will only process your personal data where we have a legal basis for doing so. This includes:

- where necessary in connection with all matters surrounding the establishment of or performance of a contract between you and us;
- in order to comply with any legal obligations and requirements; and
- where it is within our legitimate business interests to do so or where you have provided consent for us to do so.

In addition to the rights set out below, you also have the right, under certain circumstances, to request that we:

- erase any personal data that we hold regarding you;
- restrict the processing of any of your personal data;
- transfer your personal data to a third party; and
- object to the processing of your personal data, under certain circumstance.

20. Your Rights

Right to Access	The right to request access to your personal data held by us
Right to Correct	The right to seek correction of your personal data where you consider it is incorrect, incomplete, misleading, or out-of-date
Right to Erasure	The right to request us to delete all personal data we hold about you
Right to Object	The right to object at any time to certain type of processing of your personal data
Right to Data Portability	The right to receive the personal data we hold about you in an accessible format
Right to Restrict Processing	In certain circumstances, you have the right to restrict how we deal with your personal data

21. Rights Request or Privacy Complaint

You have a right to request access to your personal data held by us. You also have a right to make a complaint (**privacy complaint**) about our dealings with your personal data.

If you make a request for access to your personal data or file a privacy complaint, we will collect and use your name, contact information, and details about your request or complaint to process and communicate with you about it.

If we have your personal information, we can provide you with details about it, update it, delete it, or stop using it when you make a formal request. However, we may require you to verify your identity before doing so. We cannot do this for any third parties unless you have expressly authorised us to do so, or there is a legal requirement for us to do so.

In case you submit a request to access your personal data, and the data is controlled by our client, we will pass on the access request to that client for them to process it.

22. Contact

We are committed to treating your personal data with the greatest respect and consideration. If you:

- have any questions or concerns regarding this Privacy Policy;
- would like to confirm the accuracy of your personal data;
- believe that the privacy of your personal data has not been respected, or
- would like to update or delete incorrect personal data.

please contact us at:

e-mail: privacy@trapezegroup.com.au; or
by writing to: Privacy Policy Manager
Level 25 288 Edward Street,
Brisbane, Queensland, Australia 4000.

We will promptly acknowledge receipt of your query and provide a response within thirty (30) business days. However, if more time is needed to ensure a suitable response, we will contact you to let you know.

In the event that you have lodged a privacy complaint and you are not satisfied with our response, you may choose to contact the Office of the Australian Information Commissioner (**OAIC**). The process for lodging a complaint with the OAIC is available on their website.

