

ICE PRIVACY POLICY

1. ABOUT THIS POLICY

- 1.1 This Privacy Policy (**Policy**) applies to International Cargo Express Pty Limited ABN 54 003 500 347 (**ICE, we, our or us**), and describes how ICE collects, handles and protects the privacy of your personal information.
- 1.2 ICE is a global provider of customs brokerage, freight forwarding, project freight, warehousing and distribution, marine insurance, customs consultancy and biosecurity compliance services.
- 1.3 We are committed to protecting your privacy and understand the importance of protecting your personal information. This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure, and your rights in relation to your personal information, including how to complain and how we deal with complaints.
- 1.4 We will handle your personal information in accordance with this Policy and applicable privacy laws, including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).
- 1.5 In this Policy, **personal information** means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. It does not include information that is de-identified.
- 1.6 We may also collect sensitive information about you, which under the Privacy Act, includes health information; information about racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, memberships of a trade union, sexual orientation or practices; criminal records; genetic information (that is not otherwise health information); biometric information that is to be used for the purpose of automated biometric verification or biometric identification; and biometric templates. Sensitive information will only be collected with your consent or where otherwise permitted by law.
- 1.7 This Policy does not apply to personal information held in employee records where the handling of that information is directly related to a current or former employment relationship between ICE and the employee.
- 1.8 We may update this Policy from time to time to reflect changes in our practices or applicable law. We will publish the updated Policy on our website and will take reasonable steps to draw any material changes to your attention. We encourage you to review this Policy periodically.

2. TYPES OF PERSONAL INFORMATION WE COLLECT

- 2.1 The types of personal and sensitive information we collect about you depends on the nature of your dealings with us, and may include the following:
 - (a) in relation to our customers (including importers, exporters, and their authorised representatives) –
 - (i) full name (including individuals, partners and sole traders), business name, ABN or equivalent identifier;
 - (ii) contact details (including email address, telephone number and business address);
 - (iii) identification documents (such as passport or driver's licence where required for customs or compliance purposes, including to satisfy ICE's obligations as a licensed customs broker under the *Customs Act 1901* (Cth) and applicable requirements of the Australian Border Force);
 - (iv) authorisation details and signatures;
 - (v) shipment, transaction and service history;
 - (vi) billing, payment and banking details; and

- (vii) communications and correspondence records;
- (b) in relation to our overseas partners (including agents, carriers and network partners) – name, job title, employer or business name, work contact details and correspondence and operational communications;
- (c) in relation to our professional contacts (non-employees) – name, position, employer or business name, business contact details, and correspondence and meeting records; and
- (d) in relation to our contractors –
 - (i) full name, business name (if applicable), ABN or equivalent identifier;
 - (ii) contact details (including email address, telephone number and business address);
 - (iii) identification documents for site access or compliance;
 - (iv) licences, insurances and qualifications;
 - (v) invoicing, payment and banking details;
 - (vi) health, safety or criminal history information where required for the engagement; and
 - (vii) emergency contact details (full name, relationship to the relevant contractor and contact details, such as phone number or address).

2.2 If you are applying for a job with us, we may also collect your:

- (a) full name and contact details;
- (b) resume, employment history and qualifications;
- (c) academic records;
- (d) referee details and reference checks;
- (e) interview notes and assessment records; and
- (f) right-to-work documentation.

3. DEALING WITH US ANONYMOUSLY OR USING A PSEUDONYM

3.1 Due to the nature of our services and our obligations under customs, biosecurity and other applicable laws, we are required to verify the identity of individuals in all material dealings. Accordingly, it is generally not practicable for us to deal with individuals anonymously or under a pseudonym.

4. WAYS WE COLLECT YOUR PERSONAL INFORMATION

4.1 We may collect personal information from or about you in different ways, including:

- (a) from you directly, including when you contact us through and use our website, online enquiry forms, email or telephone; when you submit documentation or provide instructions for customs declarations, freight forwarding, shipping or other services; during ongoing communications relating to clearances, audits, disputes or regulatory queries; during site visits, operational briefings, and project coordination; through credit management and payment processes; and when you subscribe to newsletters, marketing communications or attend events;
- (b) from third parties, including shipping lines, airlines, carriers, consolidators, terminals and overseas agents; contracted warehouse operators and logistics providers; transport companies supplying driver details; insurance brokers, underwriters, surveyors and loss

adjusters; recruitment agents and labour-hire providers; engineering firms, equipment suppliers, referees and background-checking services; payroll and benefits providers; IT, cloud, software and cybersecurity service providers; banks, payment processors, auditors and professional advisors; government and regulatory bodies; approved treatment providers inspectors, and agents; event organisers; business partners; clients providing details of their representatives, contractors, or subcontractors; and customers providing consignee, consignor, notify-party or end-recipient details; and

- (c) publicly available sources, including government and regulatory registers (such as the Australian Business Register and ASIC), publicly available customs rulings, sanctions lists and regulatory notices, public business directories and company registers, port authority publications, safety and transport advisories, maritime incident reports, biosecurity alerts and public compliance notices, social media, publicly available professional profiles and qualification registers, and public security advisories.

4.2 If you apply for a job or contract position with us, we may also collect personal information about you from third parties and publicly available sources, including from:

- (a) recruitment agents and labour-hire providers;
- (b) government departments to verify your entitlement to work in Australia;
- (c) police agencies to obtain your criminal history record;
- (d) referees and background-checking services;
- (e) payroll and benefits providers;
- (f) online recruitment platforms; and
- (g) publicly available professional profiles or qualification registers, where relevant and lawful.

5. COLLECTION OF INFORMATION VIA OUR WEBSITE

5.1 When you visit our website, we may use 'cookies' or other similar tracking technologies that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. We use Google Analytics cookies, session cookies and functionality cookies. You can disable cookies through your internet browser but our website may not work as intended for you if you do so.

5.2 Whilst we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit, search engine referrals, and the internet protocol address assigned to your computer. The information collected through cookies is used for aggregate website analytics only.

5.3 Our web pages may contain electronic images, known as web beacons. These electronic images enable us to count users who have visited certain pages on our website. Web beacons are not used by us to access your personal information, they are simply a tool we use to analyse which web pages are viewed, in an aggregate number.

6. PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

6.1 We collect your personal information for the following purposes:

- (a) to provide our customs brokerage, freight forwarding export clearance services, and project freight, warehousing and distribution, marine insurance, customs consultancy and biosecurity compliance services;
- (b) to verify your identity and authority to act or provide instructions;
- (c) to manage customer, partner and professional relationships and communications;
- (d) to issue invoices, process payments, manage accounts and administer billing;

- (e) to maintain shipment, service, transaction and operational records;
- (f) to recruit, onboard and manage contractors and job applicants, including verifying qualifications, references and work rights;
- (g) to meet customs, biosecurity, export control and other regulatory requirements (including our obligations as a licensed customs broker under the *Customs Act 1901* (Cth) to ensure the accuracy of information provided to the Australian Border Force) and to comply with our legal, record-keeping and audit obligations;
- (h) to conduct marketing activities, including distributing service updates, industry insights and operational notices;
- (i) to support workplace health, safety and fitness for work, and to manage emergency situations; and
- (j) to manage IT systems, system access, cybersecurity and operational continuity.

7. DISCLOSING YOUR PERSONAL INFORMATION

7.1 In the course of conducting our business and providing our services to you, we may disclose your personal information:

- (a) to related entities within the ICE corporate group for operational efficiency, shared services and governance purposes;
- (b) to overseas agents, carriers, shipping lines, airlines, terminals, consolidators, warehouse operators, transport providers and contractors engaged to provide or support our services;
- (c) to IT, cloud hosting, and cybersecurity service providers;
- (d) to payroll and accounting service providers;
- (e) to insurance brokers, underwriters, surveyors, and loss adjusters;
- (f) to third parties authorised or nominated by you, including where required for service delivery (such as consignees, consignors, or project stakeholders) or when an employee's personal information is disclosed at their request (for example, real estate agent or landlord for a lease or as a referral for a prospective employers);
- (g) to our professional advisers, including lawyers, auditors, insurers and risk advisers;
- (h) to government and regulatory bodies, including the Australian Border Force, the Department of Home Affairs, the Department of Agriculture, Fisheries and Forestry, and other customs, biosecurity, border and regulatory authorities; and
- (i) to anyone to whom part or all of our assets or businesses are transferred or sold; and
- (j) where required or authorised by law.

7.2 Some of these recipients may be located outside Australia. ICE discloses personal information to recipients in a wide and variable range of countries, reflecting the global nature of international trade and logistics. As overseas disclosures occur on a transaction-by-transaction basis and the recipient countries vary accordingly, it is not practicable to specify all recipient countries in this Policy. However, overseas disclosures may occur to recipients located in countries including those in the Asia-Pacific region, Europe, North America, the Middle East and the United Kingdom, as well as other countries involved in international trade and logistics activities. Where we disclose personal information to an overseas recipient, we will take reasonable steps to ensure that the overseas recipient handles your personal information in accordance with the APPs.

8. DIRECT MARKETING

8.1 We may, with your consent, use the personal information we have collected about you to contact you from time to time whether by email or phone to tell you about our services, service updates, industry insights, operational notices and special offers that we believe may be of interest to you. Our marketing activities are primarily directed to existing customers (including importers and

exporters), business and professional contacts, overseas agents and logistics partners, prospective customers who submit enquiries through our website, and participants in industry forums, events or briefings.

8.2 You can withdraw your consent to receiving direct marketing communications from us at any time by:

- (a) clicking on the unsubscribe link included in our marketing emails; or
- (b) contacting us using the details set out in the 'Contact Us' section at paragraph 12 below.

We usually process opt-out requests within 7 business days of receipt.

9. SECURITY AND STORAGE

9.1 We store your personal information in both hard copy and electronic formats. Electronic information is primarily stored in our operational software, CargoWise, which is hosted via WiseTech Global's WiseCloud platform with data hosted in regional data centre clusters located in the Asia-Pacific, Europe and North America.

9.2 We take all reasonable steps (including organisational and technological measures) to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

9.3 We keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by applicable laws, including in accordance with our obligations under the *Customs Act 1901* (Cth), taxation laws and other regulatory and record-keeping obligations. We will take reasonable steps to de-identify or destroy personal information that is no longer needed for any purpose for which it may be used or disclosed under the Privacy Act.

10. ACCESS TO AND CORRECTION OF YOUR INFORMATION

10.1 We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete.

10.2 You may request access to, or correction of, the personal information we hold about you at any time by contacting:

- (a) your usual ICE representative; or
- (b) if you do not have an existing contact, our National Compliance & Administration Executive using the details set out in the 'Contact Us' section at paragraph 12 below.

Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time and usually within 30 days. If we decide to refuse your request, we will tell you why in writing and how to complain.

11. COMPLAINTS

11.1 You can make a complaint in writing to our Executive using the details set out in the 'Contact Us' section at paragraph 12 below. We will respond to you within 30 days to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.

11.2 If you are not satisfied with our response, or if we fail to respond within 30 days, you may escalate your complaint to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, www.oaic.gov.au.

12. CONTACT US

If you have any questions in relation to this Policy or wish to make a complaint or exercise your privacy rights, please contact our Executive on the following details:

Marcus Mangiafico

Mobile [+61 433 823 493](tel:+61433823493)
Direct +61 (3) 8374 8208

mmangiafico@icecargo.com.au

Postal address:
39 Lambeck Drive, Tullamarine 3043 VIC

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