



PRIVACY POLICY STATEMENT

How TOT collects, holds, uses and discloses personal information

Document owner	HR Manager
Approved by	General Manager
Effective date	01/07/2026
Version	2 (updated 28 September 2026)
Next review	12 months from effective date, or earlier following material legislative or operational change

1. Policy Statement

TOT Transport Pty Ltd (TOT) is committed to protecting the privacy of personal information it holds about customers, suppliers, employees, contractors and job applicants, in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This policy also applies to personal information collected through TOT's mobile application, TOT Mobility, used by TOT's drivers (see Section 4).

2. What This Policy Covers

This policy explains what personal information TOT collects and why, how it is used and disclosed, how it is kept secure, and how to access it, correct it, or raise a privacy concern — including personal information collected through the TOT Mobility mobile application.

3. Information TOT Collects

TOT collects information reasonably necessary for its business, including:

- from customers: name, contact and delivery details, and payment, credit and billing information;
- from suppliers, contractors and carriers: business and contact details for the entity and its personnel;
- from job applicants and employees: contact details, date of birth, employment and academic history, referee details, and other information relevant to employment;
- from users of the TOT Mobility mobile application: precise device location while an active work trip is underway in the App — see Section 4 for full detail on what is collected, why, and when it stops; and
- website usage data, which TOT uses in aggregate to improve its site and does not use to identify individuals.

4. The TOT Mobility Mobile Application

TOT Mobility (the "App") is the mobile application used by TOT drivers to manage work trips, deliveries and related tasks. The App is developed by Ignition Logistics Software on behalf of, and for the benefit of, TOT Transport Pty Ltd (TOT), and is made available to drivers on Google Play and the Apple App Store under the name "TOT Mobility".

4.1 Location information the App collects

While a driver is logged in to the App and has an active work trip open, the App collects the device's precise (GPS) location. To use the App, drivers are required to grant it "Always allow" (or the equivalent) location permission in their device settings, so that location can continue to be recorded for the duration of a trip, including while the App is running in the background.

4.2 Why this information is collected

Location data is used only to record delivery-related timestamps — for example pick-up, transit, arrival and delivery events — so that TOT can validate driver charge and pay data, and to give drivers evidence of arrival and delivery times if a customer disputes that a delivery occurred.

4.3 When location collection stops

Location collection is tied to an active work trip only. It stops automatically as soon as the driver closes the trip or logs out of the App. The App does not collect location, or any other personal information, outside of an active work trip — no personal movement or non-work activity is recorded at any time.

4.4 Who can access this information

Location and trip data collected by the App may be accessed by TOT's operations and dispatch team for the purposes described above, and may be disclosed to a customer where necessary to resolve a specific delivery dispute. Ignition Logistics Software, as the App's developer, processes this data on TOT's behalf and is required to handle it consistently with this policy and Section 6 (Data Security and Data Breaches).

5. How Information Is Used

TOT uses personal information to deliver and administer its services, process transactions and credit checks, communicate with customers and suppliers (including safety notices and responses to queries), protect against fraud, recruit and assess employees, validate driver charge and pay data and resolve delivery disputes using trip timestamps and location data recorded by the TOT Mobility App, and maintain accurate business records.

6. Disclosure of Information

TOT does not disclose personal information to third parties except where required or authorised by law, where necessary to provide the service requested (for example to a delivery partner, or to the developer of the TOT Mobility App for the purposes described in Section 4), or with the individual's consent. Any third-party access to personal information is required to be handled consistently with the Australian Privacy Principles.

7. Data Security and Data Breaches

TOT takes reasonable technical and organisational steps to keep personal information accurate, secure and up to date, whether held electronically or in hard copy. TOT operates in accordance with the Notifiable Data Breaches scheme under the Privacy Act — if a data breach is likely to result in serious harm to an individual, TOT will notify the affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by that scheme.

8. Access, Correction and Complaints

An individual may request access to, or correction of, the personal information TOT holds about them (including information collected through the TOT Mobility App), or raise a concern about how their information has been handled, by contacting TOT's Privacy Officer (a role held by the Human Resources Manager) using the details on TOT's website or by writing to TOT's registered office. TOT will respond promptly and seek to resolve the matter directly. If a complaint is not resolved to the individual's satisfaction within a reasonable time, they may lodge a complaint with the Office of the Australian Information Commissioner (www.oaic.gov.au).

9. Changes to This Policy

TOT may update this policy from time to time to reflect changes in its practices or the law — including reforms to the Privacy Act that are being progressively implemented from 2024 onward — and will publish the current version on its internal Policies and Procedures library and, where it applies to the TOT Mobility App, make it available to App users via the App or its store listing.

Supporting TOT Documents and Systems

Version 2 (28 September 2026): Added Section 4, identifying the TOT Mobility mobile application (developed by Ignition Logistics Software) and disclosing the App's collection and use of device location data, in order to align this policy with TOT's Google Play Store listing and resolve a Google Play policy rejection (missing data disclosure for Location; app/developer details not matching the store listing). No other substantive changes were made to Version 1.

Named individual contact details have been replaced with role titles (Privacy Officer / Human Resources Manager) so this statement does not go out of date whenever staff change. Version 1 also added the Notifiable Data Breaches scheme, which did not appear in the prior statement — TOT should confirm a data breach response process is documented separately from this policy.

- Confidentiality Policy
- Code of Conduct and Ethics
- TOT Transport - Driver App (Ignition) Compliance Policy

Responsibilities Summary

Role / function	Core responsibility	Key TOT control / evidence
Privacy Officer (HR Manager)	Handle access, correction and complaint requests; report suspected data breaches.	Privacy request log, OAIC correspondence if any.
Executives / management	Ensure systems and processes meet APP obligations, including for the TOT Mobility App.	Information security and retention controls.
Ignition Logistics Software (App developer)	Process App location and trip data consistently with this policy.	App privacy disclosures; Google Play / App Store listing.

Employees / associates	Handle personal information consistently with this policy.	Compliance with handling standards.
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Policy Commitment

People trust TOT with their personal information because they have to, to do business with us. TOT treats that as a responsibility, not just a compliance requirement.

Approved by: _____ Date: _____