

TIGERPAK PRIVACY POLICY

Document Name	Privacy Policy		
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Department:	Finance	Approved By:	Richard Sharps
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1. PURPOSE

TigerPak (CMT Group Pty Ltd) recognises and values the importance of protecting the privacy of our stakeholders, collaborators, partners, customers, suppliers and other third parties ('Individuals').

The information and data TigerPak collects and stores are generally of a business nature and rarely contains personal information (i.e. personal email/address etc). This information is used only for the purposes of facilitating the supply of products and services to you, the customer and servicing our relationship with you.

However, to enable us to deliver excellence for our customers, including carrying out our day-to-day business functions (including, for example, servicing customers (preparing quotes, handling and delivery of orders), hiring new employees or dealing with suppliers or contractors) ('Operational Purposes'), we may need to collect a broad range of company and individual contact information from individuals and businesses. TigerPak is committed to handling personal information in accordance with applicable laws, including the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

In the course of providing our products and services or in connection with the Operational Purposes, we may collect personal information, either directly or indirectly. This Privacy Policy sets out why and how we collect, hold, use and disclose their personal information.

2. SCOPE

This policy will apply to all officials of TigerPak. This includes:

- Directors;
- Employees, permanent and casual;
- Contractors and Consultants;
- Any other persons that act on behalf of TigerPak.

3. POLICY STATEMENT

This Privacy Policy is divided into a number of sections and includes information on how we manage personal information as well as providing answers to commonly asked questions.

3.1 WHAT IS PERSONAL INFORMATION?

Definitions of 'personal information' differ around the world. In Australia, the collection, storage, use and disclosure of 'personal information' is regulated by the *Privacy Act 1988* (Cth) (the "**Act**"). The Act defines 'personal information' as:

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

The definition of 'personal information' is therefore extremely broad, but good examples would include a person's full name and address.

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Schedule 1 of the Act also sets out thirteen Australian Privacy Principles (the ‘**APPs**’) which comprehensively cover the protection of personal information. TigerPak will always collect, hold, use and disclose personal information in accordance with the Act, the APPs and this Privacy Policy.

3.2 WHY DO WE NEED TO COLLECT PERSONAL INFORMATION?

We collect personal information reasonably necessary for one or more of our functions or activities in connection with the Operational Purposes. This personal information may include sensitive information, including credit information. Individuals may decide to provide personal information to TigerPak for a range of different reasons. By way of example, they may wish to:

- (a) Become a customer of TigerPak
- (b) Become a supplier of or provide services to TigerPak
- (c) Become an employee of TigerPak
- (d) Collaborate with TigerPak
- (e) Receive communications from TigerPak
- (f) Connect with us via social media

We will not collect more personal information than we reasonably need to in connection with the Operational Purposes or to otherwise deal with our third parties.

3.3 HOW DO WE COLLECT PERSONAL INFORMATION?

We may collect personal information from individuals in person, in writing, by telephone, through our website and by other electronic communication channels. We may also collect this personal information through our staff and through our contracted agents and other service providers.

The kinds of personal information we collect will depend on the purposes for which individuals interact with TigerPak. The personal information we may collect from individuals and/or companies may include:

- Full name and prefix (e.g. Mr or Mrs)
- Address/delivery address (usually business address only)
- Phone number (usually business phone number only)
- Employer and its ABN/ACN
- Email address, so that we can authenticate them electronically and administer their account (usually business email address)
- Credit card details and other information
- Social network contact and publicly available details

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Individuals/Companies may not be able to deal with or interact with TigerPak if they do not provide us with a minimum of personal information.

We may, at times, collect information on publicly maintained records, if that collection is reasonably necessary for TigerPak's legitimate functions or activities, such as credit agencies.

3.4 HOW DO WE USE OR HOLD PERSONAL INFORMATION?

We use and hold individuals' personal information to facilitate the Operational Purposes, as well as our general operational, technical and administrative purposes. We may from time to time share the personal information we collect with any of our relevant third parties, including our partners, suppliers, collaborators, advisers and business associates. We would only share personal information with third parties where it is necessary in undertaking those activities that our third parties have agreed to be involved. For example, we would need to share delivery addresses and contacts with our third-party fleet provider.

To keep individuals up to date with our products, services, publications and other resources, we may place them on a communications list, including mail, telephone and/or email. At any time, if an individual or company no longer wishes to receive this information, they may let us know and we will remove their details from the contact list.

Any credit card information received via phone is entered into the Payway merchant portal directly. No credit card details will ever be written down or retained by TigerPak, either in digital or physical form.

3.5 COMMUNICATIONS

Where individuals create an account with TigerPak, they may opt-in to TigerPak sending advertising and other direct marketing material to them.

Individuals may opt-out of the provision of direct marketing materials by using the functional unsubscribe option or by contacting us.

3.6 HOW AND WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?

Where necessary, we will disclose an individual's personal information to our third-party suppliers, partners, collaborators, contractors or others in order to facilitate the Operational Purposes.

Either TigerPak or our Providers may disclose an individual's personal information where it is reasonable to do so or where we are authorised or required to do so by applicable law.

TigerPak may disclose personal information to trusted third parties engaged to assist us with services including freight companies, data processing, data analysis, information technology services and support, website maintenance/development, printing, record archiving, data mailing and market research.

We do not typically or routinely disclose personal information to overseas recipients. Unless consent has been given, or an exception under the Australian Privacy Principles applies, we will only disclose personal information to overseas recipients where reasonable steps have been taken to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to our third parties' personal information.

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3.7 SECURITY

We take reasonable steps to prevent the personal information we hold about individuals from misuse, interference or loss, and from unauthorised access, modification or disclosure. Our security measures meet industry standards and individuals can feel confident in our processes. These may include access control procedures, network firewalls, encryption and physical security. Although we will endeavour to protect all personal information we hold, we are unable to guarantee that any information transmitted to us over the internet is 100% secure.

3.8 QUALITY OF YOUR INFORMATION

We will take reasonable steps to ensure that the personal information we hold, use and disclose is accurate, up to date and complete. However, we will not necessarily take any administrative steps to verify the accuracy or completeness of the information individuals provide to us (or a third party) at the time of collection (for example, if they make a mistake when typing in their details or choose to use a pseudonym).

If an individual suspects or believes that the personal information we have is not accurate, complete or up to date, they may contact us at the details below and we will respond to their request within a reasonable period. When responding, we will take reasonable steps to correct that information and to ensure that it remains accurate, complete and up to date in the future. If for some reason we are unable to correct personal information, we will provide that individual with our reasons and further options for complaint. We will not ordinarily charge people for requesting the correction of their personal information.

3.9 ACCESS TO PERSONAL INFORMATION

Individuals are entitled to access the personal information we hold about them, on request, subject to a limited number of exceptions. If for some reason we are unable to provide them with access to their personal information, we will provide them with our reasons as well as their further options for complaint. If we did not collect personal information directly from an individual, it may be more practical for us to pass their access request on to the relevant third party who did collect that information from them.

Individuals may make an access request via the contact details below and we will respond to their request within a reasonable period. We will not ordinarily charge our individuals for gaining access to their personal information.

3.10 HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

We retain personal information after we have used the personal information for the purposes for which we collected or received it. The duration that we keep your personal information for will be influenced by the nature of that information, and any applicable regulatory requirements. Financial transaction records are kept for a minimum period of seven years.

For all types of personal information, when no longer required, TigerPak will use its best endeavours to ensure that all such information will be deleted or destroyed in a secure manner and in a reasonable timeframe.

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3.11 OUR INTERACTION WITH YOU VIA THE INTERNET AND SOCIAL MEDIA

To improve your experience on the TigerPak websites and online applications, we may use ‘cookies’. Cookies are small text files that may transfer to your computer when you visit one of our digital platforms. The use of cookies is a standard practice for most businesses and organisations as it allows your computer or device to remember your preferences. You can turn off cookies in your browser settings if you do not want them to be active across any digital platform.

Our digital platforms also use [Google Analytics](#). These services currently collect unidentifiable data from users of the relevant digital products. This allows us to generate reports to help us understand digital traffic and behaviour.

When you look at our website, our Internet Service Provider may make a record of your visit and logs the following information for statistical purposes only – the user’s server address, the user’s top level domain name (for example .com, .gov, .au, etc), the date and time of the visit to the site, the pages accessed and documents downloaded, the previous site visited, and the type of browser used.

When using any TigerPak website or online application, you consent to Google processing your data as set out in their [Privacy Policy](#); for the purposes described above.

You can opt out of your unidentified data being processed by disabling your cookies, disabling JavaScript, or using [Google’s opt-out service](#).

3.12 HOW TO CONTACT US OR MAKE A COMPLAINT

If partisan individual would like to contact us, including to ask a question, request removal from our communications or make a complaint, we may be reached at the details below:

Attn: Data Officer
Address: TigerPak
21 Astoria Street
Marsden Park
NSW, 2765

Email: info@tigerpak.com.au

Telephone: 1300 525 325

If an individual is unhappy with our response to their complaint, they have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC). Details of how to contact the OAIC are provided on its website at www.oaic.gov.au.

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3.13 GENERAL

We may modify or amend the provisions of this Privacy Policy from time to time. We will take reasonable steps to bring any such modifications or amendments to our third parties attention.

Individuals can find more information about privacy and the protection of your Personal Information on the website of the OAIC at www.oaic.gov.au.

We use Google Analytics to analyse the audience statistics of our website to improve our content. No personal information is collected by Google Analytics.

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