

## PRIVACY POLICY

This Policy sets out the requirements for privacy across U-Go Mobility Pty Ltd. ('U-Go Mobility').

This Policy applies to all employees of the Group, third parties engaged by the Group, and all alliances and joint ventures in all jurisdictions.

The objectives of this Policy are to treat personal information in accordance with the Privacy Act 1988 (Commonwealth) (the **Privacy Act**) and the Australian Privacy Principles (**APPs**). Any personal information outside Australia, will be treated in accordance with the applicable law.

### What personal information do we collect?

Personal information is any information (including an opinion) which can be used to identify an individual. Sensitive information is a subset of personal information which includes information about an individual's race or ethnicity, political or religious beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal record and health information.

U-Go Mobility may collect and hold the following Information:

- Personal Information about employees including: name, address, date of birth and age, email address, phone number, gender, terms and conditions of employment, qualifications, competencies and training records, performance and payroll records.
- Sensitive Information about employees including: memberships or associations, current licenses, criminal record, health and vaccination information including relevant disabilities, and biometric information if required for the purpose of automated biometric verification for security purposes.

Personal Information provided to us by a customer or business partner for the purposes of providing a service to them or to their customers, including: first and last name, a contact phone number and email address, credit card or other payment details, billing address, and any special requirements photo or video footage e.g. CCTV.

Personal information will not be shared, sold or disclosed by U-Go Mobility other than in accordance with this Policy, without an individual's permission, or in accordance with the Privacy Act.

U-Go Mobility generally collects personal information directly from the individual to whom it relates, except where that individual has consented to U-Go Mobility collecting the personal information from a third party, the law otherwise permits U-Go Mobility to do so, or where it is unreasonable or impracticable to collect it directly. U-Go Mobility only collects sensitive information directly from individuals with their consent, or where required, it is authorised or otherwise permitted to collect the information from a third party by law.

An individual has the option, where lawful and practicable, not to be identified when communicating or entering into transactions with U-Go Mobility (including by the use of a pseudonym). However, in most circumstances, it will be impracticable for U-Go Mobility to do business with an individual or provide the services required by an individual unless personal information is provided.

## Purposes for which we collect, hold, use personal information

Personal information will be stored in U-Go Mobility's systems for immediate business and administration purposes, as detailed above, and may be used or disclosed for the purpose for which it was collected, or for a related purpose which someone may reasonably expect. Sensitive information will only be disclosed for a purpose which is directly related to the purpose for which it was collected.

The Personal information U-Go Mobility collects about employees and customers will be used for the purposes including but not limited to:

- enable recruitment and selection processes;
- enable U-Go Mobility to deliver services or information to individuals or to an organization;
- enable U-Go Mobility to assist to provide services; or to improve, and better understand preferences in respect of U-Go Mobility services;
- for complaints handling or data analytics purposes; and
- fulfil its legal or regulatory obligations.

Personal information may also be collected from, and disclosed to, third parties in the course of business activities. For example, during a recruitment process steps may be taken to verify the accuracy and completeness of the information and, in appropriate circumstances, health checks, credit checks or criminal records checks may be carried out. We may also collect and use customers' personal information to fulfil administrative functions concerning the provision of passenger transport services, for marketing and client relationship purposes.

## Disclosure of personal information

Personal information may be disclosed between related bodies corporate within U-Go Mobility Group worldwide and used by those entities for the same purposes for which the collecting company is entitled to use it outlined above at section [2].

U-Go Mobility may also disclose or use personal information (including to overseas recipients which may result in off-store storage of Personal Information in countries including the United Kingdom, the United States, France, Singapore, New Zealand, and North America):

- to third party service providers and business associates, including our joint venture and alliance partners, who provide services in connection with its business. These third parties may be located locally or overseas.
- with the individual's consent;
- where required, authorised or permitted to do so by law;
- to a person authorised to act on the individual's behalf; or
- as required by law and specifically to any government agency if U-Go Mobility believes in good faith that it must do so to comply with the law or that doing so is required to prevent, detect, investigate or remedy improper conduct potentially affecting it.

Where U-Go Mobility holds or transfers personal information outside Australia, it will meet the safeguards set out in the Privacy Act. Where personal information is held or disclosed overseas, all reasonable steps will be taken to ensure that the recipient will handle the information in a manner consistent with the Privacy Act and in the case of the European Union the General Data Protection Regulation (please refer to the U-Go Mobility collection statements located at U-Go Mobility.com.au for further details).

## Confidentiality and security

U-Go Mobility is committed to:

- safeguarding all personal information provided to U-Go Mobility;
- ensuring that personal information remains confidential and secure; and
- taking all reasonable steps to ensure that personal privacy is respected.

U-Go Mobility maintains physical, electronic and procedural safeguards to protect personal information from misuse, interference, unauthorised access, modification or disclosure, and loss or corruption by computer viruses and other sources of harm. Access to personal information is restricted to those employees, joint venture partners, subsidiary companies and third parties who need to know that information.

In accordance with the Privacy Act, U-Go Mobility is required to notify you and the Australian Information Commissioner if it becomes aware of a data breach (such as an unauthorised disclosure of or unauthorised access to data, or a loss of data) where that breach is reasonably likely to result in serious harm. This will apply even if your data is being held offshore.

## Accessing or correcting personal information

In most circumstances, U-Go Mobility will make available to an individual upon their request any personal information held about them. Requests to access personal information may be made at any time. U-Go Mobility will respond to a request within a reasonable time, and in the manner requested, unless there is a legal or administrative reason preventing U-Go Mobility from doing so. In some cases a reasonable fee may be charged for providing access.

Reasonable steps will be taken to ensure the personal information held is accurate, complete, up to date, relevant and not misleading before it is used or shared.

An individual may request that personal information be corrected or supplemented if the individual believes the information held by U-Go Mobility is inaccurate or misleading. If U-Go Mobility agrees, the change will be made. If U-Go Mobility disagrees, U-Go Mobility will advise the individual and include a notation on the record that the information's accuracy is disputed.

If personal information changes, or if an individual believes that the personal information held by U-Go Mobility is no longer accurate or complete or has been the subject of a data breach, the individual should contact the Privacy Officer.

## Use of cookies

A cookie is a small text file downloaded onto a computer or mobile device when a website is accessed, including the U-Go Mobility website. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website's owners and third parties.

Cookies allow a website to recognise a computer or mobile device. Cookies do not identify the individual, but do identify the computer or mobile device used to access the Internet, and can therefore be used to collect information about the individual's use of the Internet. Cookies do not allow access to any information stored on the individual's computer or mobile device.

Cookies are used to collect information, where available, about a computer or mobile device for system administration purposes, such as IP address, operating system and browser type. Information collected through the use of cookies will only be used to evaluate U-Go Mobility's website effectiveness and to improve user experience. Cookies are not used to identify an individual or to send targeted advertising.

## Websites

U-Go Mobility's website provides hyperlinks to websites owned and controlled by others. U-Go Mobility is not responsible for the privacy practices of these websites. By accessing or using U-Go Mobility's website, an individual consents to the collection, use and disclosure of personal information as described in this Policy, as amended from time to time.

## Privacy Officer Contact Details

By email: TBC

By post: The Privacy Officer, U-Go Mobility, Level 8, 40 Miller Street, North Sydney, NSW 2060

U-Go Mobility will respond to requests to correct or supplement personal information within a reasonable time period.

## Destruction and de-identification of personal information

Records management policies govern the archiving and destruction of records which include personal information.

If unsolicited personal information is received, reasonable steps will be taken to destroy or de-identify that personal information.

## Complaints

If an individual has a question, concern or complaint regarding the way in which personal information is handled or believes that U-Go Mobility or one of its Operating Companies has breached its obligations under the Privacy Act or has failed to comply with this Policy, they should make a complaint in writing to U-Go Mobility's Privacy Officer.

U-Go Mobility will review and respond to any complaint as soon as possible, and generally within 30 days of receiving it.

If an individual is not satisfied with U-Go Mobility's response, the complaint can be referred to the Office of the Australian Information Commissioner (OAIC). The OAIC will generally only consider a complaint if the individual has first written to U-Go Mobility and given U-Go Mobility a reasonable opportunity to resolve the complaint (usually 30 days).

Dated June 2023  
U-Go Mobility Pty Limited