

## Privacy Policy

**Freedom Fuels** is committed to customer service and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

'Freedom Fuels' encompasses the Freedom Fuels' Group of companies as follows:

Freedom Fuels Australia Pty Ltd A.C.N. 093 244 761;

Freedom Fuels Terminalling Pty Ltd A.C.N. 097 617 082; and

Freedom Energy Holdings Pty Ltd A.C.N. 093 244 844.

together with the ultimate group shareholder, Idemitsu International (Asia) Pte. Ltd., a Japanese JSOX publicly listed entity.

Personal Information will be shared within the Freedom Fuels' Group and with its shareholders.

We have adopted the 13 Australian Privacy Principles (APPs) contained in the *Privacy Amendment (Enhancing Privacy Protections) Act 2012 (Cth)* (the *Privacy Amendment Act*) which govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. See [www.oaic.gov.au](http://www.oaic.gov.au) for more details.

### What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual.

Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers, employment history, educational qualifications, and complaint details. This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website [www.freedomfuels.com.au](http://www.freedomfuels.com.au) and from third parties.

We collect your Personal Information for the primary purpose of providing information and services to you as our customer or potential employee. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time; all you need to do is let us know.

We do also automatically collect data on our website including logging our visitor's domain and IP address automatically; this information does not identify you as an individual, but only the computer that is being used to view the site. This data is used to see where the site is being used in the world to ensure coverage, and for click stream analysis to help better understand site usage, so that we can improve our service to you. We do not link information automatically logged with personal data about specific individuals. Our website may use session cookies when an individual utilises features such as search queries, RSS and flash components.

When you request information via our website, we may need to know some personal information about you. When emailing us, registering for recruitment, subscribing for free news or information we need your e-mail address, name and other limited personal identifiers. Your personal data may be processed to provide information, products and services you request in the form that you require.

### Sensitive Information

Sensitive information is defined in APP 3 and the *Privacy Act 1988 (Cth)* and the *Privacy Amendment Act* to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, health information and tax file numbers.

Sensitive information will be collected and/used by us only as is reasonably necessary for one or more of the following of our functions or activities:

- with your consent;
- where required or authorised by law, a 'permitted general situation' exists, namely:
  - to lessen or prevent serious threat to life, health or safety;
  - to take appropriate action in relation to suspected unlawful activity or serious misconduct;
  - for locating a missing person;
  - as may be reasonably necessary for establishing, exercising or defending a legal or equitable claim; or
  - as may be reasonably necessary for a confidential alternative dispute resolution process.

### **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take all reasonable steps to ensure that you are made aware of the information provided to us by such third party.

### **Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:

- third parties where you consent to the use or disclosure (i.e. Credit Reporting Agencies if you are applying for credit/are an existing account customer); and
- where required or authorised by law.

This may include potential disclosure to overseas recipients including Freedom Fuels' shareholders in Japan and/or its credit insurance underwriters and Microsoft Hosted Exchange data storage in Hong Kong and/or Singapore. By providing us with your Personal Information you are expressly acknowledging acceptance of our Privacy Policy, your consent to the potential use and/or disclosure of your Personal Information overseas, and your acknowledgement that Freedom Fuels will not be responsible for ensuring that any overseas recipient is compliant with the applicable Privacy Principles in relation to your Personal Information. Freedom Fuels will not be liable for any breach of the Australian Privacy Principles by any overseas recipient and you may have no recourse under the Privacy Act against overseas recipients.

### **Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse, interference and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in customer files which will be kept by us for a minimum of 7 years.

### **Access to your Personal Information**

APP 12 provides you with the right to access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please make out your request to us in writing.

**Freedom Fuels** will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing such information.

## **Maintaining the Quality of your Personal Information**

It is an important part of providing our services to you that your Personal Information is accurate, up to date complete and not misleading. APP 10 provide that we take reasonable steps to make sure that your Personal Information as collected is accurate, up to date complete and not misleading.

It is important that you advise us at the earliest opportunity of any changes to your Personal Information so that our records can be updated. We will take all reasonable steps in accordance with APP 13 to correct your Personal Information where:

- we are satisfied the information is inaccurate, out-of –date, incomplete, irrelevant or misleading, having regard to the purpose for which it is held; or
- you request us to correct your Personal Information.

## **Anonymity & Use of Pseudonyms**

APP 2 provides individuals with the option of not identifying themselves, or of using a pseudonym. Where practicable, having regard to the primary purpose you are disclosing the information to us, you will have the ability via our website (<https://www.freedomfuels.com.au/enquiry>) to submit an enquiry form anonymously. However, this provision will not apply if it is impracticable for Freedom Fuels to deal with you when you have not identified yourself

## **Policy Updates**

This Policy may change from time to time. Our Privacy Policy is available via our head office or on our website to anyone who requests it.

## **Complaints**

You can lodge a complaint with us about any breach of our Privacy Policy and our privacy obligations to you by contacting us. You may also unsubscribe or opt-out of any of our web based or other services and withdraw consent to use your information at any time by contacting Freedom Fuels Customer Service Centre on 1300 667 202, or use the 'Make an enquiry' button on our web site, or via email: [privacy@freedomfuels.com.au](mailto:privacy@freedomfuels.com.au). Please note that withdrawing your consent may result in your limited ability to use our website.

## **Privacy Policy Enquiries**

If you have any queries about our Privacy Policy please contact our head office at:

Unit 5, 16 Theodore Street,  
Eagle Farm Qld 4009  
Australia  
Ph: + 61 7 3268 5077  
Fax: +61 7 3268 6477