



# PRIVACY POLICY

PRM-IMS-POL-0016



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## 1. PURPOSE

Pilbara Rail Maintenance Pty Ltd (PRM or the Company) values and respects the privacy of the people we engage with. We are committed to protecting personal information and complying with the Privacy Act 1988 (Cth) and other applicable privacy laws and standards.

This policy outlines PRM's approach to the collection, use, storage, disclosure, and protection of personal information, including data obtained through workplace technologies such as vehicle monitoring systems. It supports our commitment to Respect, Reliability, and Ingenuity by ensuring transparency, accountability, and trust in the way we handle information.

## 2. SCOPE

This policy applies to all PRM directors, officers, employees, contractors, consultants, and subcontractors (**Representatives**). It covers all personal information collected, held, and processed by PRM in the course of business activities, including client services, HR management, procurement, and operational monitoring.

## 3. POLICY STATEMENT

PRM recognises that the protection of personal information is fundamental to maintaining the trust of our employees, clients, partners, and the communities in which we operate. We are committed to ensuring that all personal information is collected, managed, stored, and disclosed responsibly, transparently, and in compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

Our commitment means that PRM will:

- **Collect responsibly:** We will only collect personal information that is necessary for our business functions, safety obligations, and compliance requirements.
- **Use lawfully:** Personal information will only be used for the purpose for which it was collected or as otherwise permitted by law.
- **Safeguard:** Information will be safeguarded against loss, misuse, unauthorised access, modification, or disclosure through secure systems and access controls.
- **Respect individual rights:** All individuals have the right to request access to, and correction of, their personal information, and to raise concerns regarding how it is managed.
- **Be transparent:** We will provide clear information on how and why personal data is collected, including through monitoring systems such as IVMS, GPS, and fatigue management technologies.

- **Continuously improve:** PRM will regularly review its privacy practices, train staff on their obligations, and strengthen controls in line with evolving risks, technology, and industry standards.

By embedding these principles into our daily operations, PRM ensures that privacy management is not just a compliance obligation, but a reflection of our values of Respect, Reliability, and Ingenuity.

## 4. COLLECTION OF PERSONAL INFORMATION

PRM may collect personal information directly from you when you:

- Engage with PRM in person, online, or by phone.
- Apply for employment, training, or contracting opportunities.
- Subscribe to communications, attend events, or participate in surveys.
- Operate or travel in PRM Vehicles fitted with monitoring systems.

### Sensitive Information

PRM may collect sensitive information (such as health information, criminal history, or union membership) where required for employment, safety, or compliance purposes. Such information will only be collected with the individual's consent, or as otherwise authorised by law.

Where collection relates to workplace monitoring, surveillance, or the use of in-vehicle monitoring systems, PRM will obtain consent through the Consent Form – Vehicle Monitoring, which must be signed by all relevant Representatives prior to participation in these activities.

## 5. VEHICLE MONITORING

To protect our people and assets, PRM vehicles may be fitted with monitoring systems, including:

- **GPS tracking:** recording location, route, and vehicle movement.
- **In-Vehicle Monitoring Systems (IVMS):** recording speed, acceleration, maintenance needs, driver behaviour, and seatbelt usage.
- **Driver Fatigue & Distraction Monitoring (DFDM):** recording indicators such as eye closure, mobile phone use, erratic driving, and may include video footage and biometric templates.

**Personal Information collected through monitoring includes:**

- Location (real-time and historical).
- Driving behaviour and vehicle use.
- Video footage of drivers and passengers.
- Generated evaluations of fatigue, distraction, and compliance with PRM safety requirements.

Monitoring may continue during personal use of PRM vehicles. Employees must notify passengers of this monitoring.

## 6. USE AND DISCLOSURE OF PERSONAL INFORMATION

**PRM uses personal information for purposes including:**

- Compliance with safety, legal, and regulatory obligations.
- Safeguarding PRM assets and resources.
- Monitoring, investigating, and addressing breaches of policy or misconduct.
- Supporting client services, operational performance, and business improvement.
- Cooperating with law enforcement, regulators, insurers, and other authorised third parties.

Personal information may be disclosed to:

- PRM related entities and partners.
- IT and service providers (some of whom may be located overseas).
- Government regulators, clients, and insurers.
- Legal representatives and law enforcement agencies.

## 7. DATA SECURITY AND RETENTION

PRM takes reasonable steps to protect personal information, including:

- Physical security of premises and records.
- Restricted access controls and multi-factor authentication.
- Data encryption, secure backups, and firewall protections.
- Ongoing staff training in privacy and cyber security.
- Personal information will not be kept longer than necessary, except where retention is required for legal or regulatory purposes.

## 8. ACCESS, CORRECTION AND COMPLAINTS

Individuals may request access to, or correction of, their personal information held by PRM by contacting the PRM Privacy Officer:

Chelsea Herman – General Counsel

Email: [chelsea.herman@pilbara-rm.com.au](mailto:chelsea.herman@pilbara-rm.com.au)

If you have a concern or complaint about how PRM has handled your personal information, you are encouraged to raise it directly with us.

PRM will:

- Acknowledge receipt of your concern,
- Work with you to investigate and resolve the matter fairly and promptly, and
- Keep you informed throughout the process.

If you are not satisfied with PRM's response, you may escalate the matter to the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au).

## 9. RESPONSIBILITIES

ROLE	RESPONSIBILITY
<b>PRM Management</b>	Ensure implementation of privacy controls and risk management processes.
<b>Chelsea Herman General Counsel (Privacy Officer)</b>	Act as PRM's Privacy Officer; oversee compliance with the Privacy Act, manage access and correction requests, investigate and resolve privacy complaints, and serve as the primary point of contact for privacy matters.
<b>Supervisors</b>	Enforce privacy practices in day-to-day operations and escalate concerns.
<b>Representatives</b>	Handle personal information responsibly and comply with this policy.

## 10. LEGISLATIVE AND STANDARDS REFERENCES

This policy is developed in accordance with:

- Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs)
- Work Health and Safety Act 2020 (WA)
- Rail Safety National Law (WA) Act 2015
- PRM Integrated Management System (IMS)



## 11. MONITORING AND REVIEW

This policy will be reviewed annually or when legislative, operational, or organisational changes occur. Feedback from staff and stakeholders is encouraged to improve policy effectiveness.

## 12. FURTHER INFORMATION

Questions or concerns about this policy should be directed to:

Chelsea Herman – General Counsel

Email: [chelsea.herman@pilbara-rm.com.au](mailto:chelsea.herman@pilbara-rm.com.au)

## 13. RELATED DOCUMENTS

- Ethical Business Practices Policy
- Complaints Handling Policy
- IT & Cyber Security Policy
- Consent Form – Vehicle Monitoring
- PRM Employee Handbook
- PRM Integrated Management System (IMS)

14. VERSION CONTROL

VERSION	DATE	DESCRIPTION	AUTHOR	CHECKED BY	APPROVED BY
1.0	05/09/2025	Initial release	S.Hilton	C.Herman	



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NOTICE:

All information contained within this document is the property of PRM.

This document is considered un-controlled when printed.

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