

TLK

Australian Freight Cost Advisory & Intelligence

Privacy Policy

How we collect, use, store, and disclose personal information.

Version	tlki-pp-v2-2026-04
Effective from	19 April 2026
Applies to	AM Strategist (amstrategists.com) and TLKSource (tlksource.com.au)
Governing law	Privacy Act 1988 (Cth), as amended by the Privacy and Other Legislation Amendment Act 2024 (Cth)
Status	Draft for legal review — pending Sprintlaw sign-off

1. About this policy

Andrew Meadows, sole trader, trading as The Lazy Kangaroos, AM Strategist, and TLKSource (ABN 16 525 180 164), referred to in this policy as TLK, respects your privacy and is committed to handling personal information in accordance with the Privacy Act 1988 (Cth) and the thirteen Australian Privacy Principles (APPs).

This Privacy Policy applies to personal information handled by TLK and both of its trading names:

- AM Strategist — freight cost advisory services for Australian shippers, operating at amstrategists.com.
- TLKSource — freight cost intelligence platform, operating at tlksource.com.au.

In this policy, "we", "us", and "our" refer to TLK. "You" means any individual whose personal information we handle, including visitors to our websites, customers, prospective customers, and individuals whose personal information is included in client data provided to us.

This policy explains: what personal information we collect, how and why we collect it, how we use and disclose it, how we store and secure it, when it may be disclosed overseas, how long we keep it, and how you can access, correct, or complain about its handling.

2. Personal information we collect

The personal information we collect depends on how you interact with us. It may include:

2.1 Contact and business information

- Name, job title, email address, phone number, and business contact details.
- Company name, ABN, industry, and annual freight spend band.
- Correspondence with us, including email content, message history, and notes of conversations.

2.2 Account information (TLKSource users)

- Account credentials, including username and password (stored in hashed form).
- Subscription and billing information (payment card details are processed by our payment provider and not stored by us directly).
- Usage data about how you interact with the Platform, including login times, pages visited, and features used.

2.3 Engagement records

- Details of services engaged, terms accepted, invoices issued, and payments received.
- Electronic acceptance records, including the IP address, user agent, timestamp, and version of terms accepted by authorised representatives when entering contracts with us.

2.4 Client data containing personal information

In the course of providing services, clients may upload or provide data that contains personal information belonging to individuals within the client's organisation or the client's carriers. This typically includes names, job titles, and email addresses of dispatch staff, finance staff, or carrier representatives appearing on freight invoices, contracts, or correspondence. We treat

this personal information in accordance with this policy and our contractual obligations to the client.

2.5 Technical and website data

- IP address, device type, operating system, browser, referring URL, and pages visited.
- Cookies and similar technologies used to operate and analyse the websites (see clause 10).

2.6 Sensitive information

We do not ordinarily collect sensitive information as defined under the Privacy Act (such as information about health, race, religion, political opinions, or criminal history). If we ever need to collect sensitive information, we will seek your express consent and will only use it for the purpose specified at collection.

3. How we collect personal information

We collect personal information directly from you in most cases, including when you:

- Visit our websites.
- Submit a contact form, request a sales pack, or subscribe to communications.
- Create a TLKSource account or engage AM Strategist for services.
- Upload freight data to TLKSource or provide client data to AM Strategist.
- Correspond with us by email, phone, or through our AI assistants.

We may also collect personal information from third-party sources, including publicly available business directories (such as ASIC registers and public company websites), professional networking platforms (such as LinkedIn), and business contact databases used for B2B outreach. Where we obtain personal information from a third party, we take reasonable steps to verify its accuracy and relevance.

4. Why we collect and how we use personal information

We collect and use personal information for the following primary purposes:

4.1 To provide our services

- Operating the TLKSource platform, including authenticating users, processing freight data uploads, generating analyses, and delivering reports.
- Providing AM Strategist advisory services, including invoice audits, diagnostics, tenders, and retained intelligence.
- Issuing invoices, processing payments, and managing client accounts.

4.2 To communicate with you

- Responding to enquiries and requests.
- Sending service-related communications (invoices, reports, account notices).
- Sending industry updates, sales packs, or product information where you have consented or where inferred consent applies under the Spam Act 2003 (Cth).
- Conducting outreach to prospective clients as permitted under Australian marketing and privacy laws.

4.3 To improve our services and datasets

- Analysing platform usage to improve functionality, performance, and user experience.
- Maintaining and improving our anonymised benchmarking datasets (see clause 6).

4.4 To comply with legal obligations

- Record-keeping required under the Corporations Act 2001 (Cth), the A New Tax System (Goods and Services Tax) Act 1999 (Cth), the Income Tax Assessment Acts, and other applicable laws.
- Responding to lawful requests from regulators, law enforcement, or courts.

4.5 To protect our business and legitimate interests

- Detecting, preventing, and investigating security incidents, fraud, and misuse of our services.
- Exercising and defending legal claims.

5. Who we disclose personal information to

We disclose personal information only where necessary for the purposes described in clause 4. We do not sell personal information to any third party. We do not disclose personal information to your carriers, suppliers, or competitors.

5.1 Service providers

We disclose personal information to third-party service providers who assist us in operating our business. These providers are bound by confidentiality obligations and are permitted to use personal information only for the purpose for which it was disclosed. The principal service providers are:

Cloudflare, Inc.	Website hosting, application infrastructure, content delivery, security (United States; data stored in Asia-Pacific region where available)
Stripe, Inc.	Payment processing (United States)
Resend, Inc.	Transactional and marketing email delivery (United States)
Anthropic PBC	AI-assisted analysis of client queries and documents (United States)
Google LLC	Email, calendar, and productivity services for our business operations (United States)
Xero Limited	Accounting and invoicing (New Zealand)

5.2 Professional advisers

We may disclose personal information to our lawyers, accountants, insurers, and other professional advisers in the normal course of our business.

5.3 Legal and regulatory disclosures

We may disclose personal information where required by law, court order, or regulatory process, including to the Office of the Australian Information Commissioner (OAIC), the Australian Taxation Office, and other Australian regulators.

5.4 Business transfer

If we sell or restructure our business, we may disclose personal information to a purchaser or successor entity as part of the transaction, subject to the recipient agreeing to handle the personal information in accordance with the Privacy Act and equivalent protections.

6. Anonymised aggregated data

A core function of our businesses is benchmarking Australian freight costs. To provide this function, we aggregate client data (including rates, surcharges, and performance metrics) into anonymised reference datasets.

Anonymised aggregated data:

- Is stripped of any identifier that could be used to identify any specific client, carrier, supplier, or individual.
- Is combined with data from multiple sources so that no rate, metric, or data point is attributable to any single client.
- Is retained by us indefinitely for the purpose of maintaining and improving our benchmarking datasets, including after a client's engagement with us ends.

This anonymised aggregation is disclosed to each client in our contractual terms and forms part of the consideration for our services. Anonymised aggregated data is not personal information under the Privacy Act.

7. Overseas disclosure of personal information

Several of our service providers are located overseas, principally in the United States. This means that personal information we handle may be stored in or accessed from overseas.

The overseas recipients of personal information are the entities listed in clause 5.1 above. By using our services or providing personal information to us, you consent to your personal information being disclosed to these overseas recipients for the purposes described in this policy.

We take reasonable steps to ensure overseas recipients handle personal information consistent with the APPs, including through contractual commitments where appropriate. However, we cannot guarantee that overseas recipients are subject to privacy laws equivalent to Australia's. By consenting to overseas disclosure under this policy, you acknowledge that APP 8.1 does not apply, and that if an overseas recipient handles personal information in a way that would breach the APPs, we may not be accountable under the Privacy Act for that handling.

8. Storage and security

We take reasonable technical and organisational measures to protect personal information from unauthorised access, use, modification, disclosure, loss, and destruction, consistent with APP 11 as strengthened by the Privacy and Other Legislation Amendment Act 2024 (Cth).

8.1 Technical measures

- Encryption of personal information at rest and in transit using current industry standards.
- Multi-factor authentication for administrative access.
- Access controls restricting personal information to personnel who need it for their role.
- Logging and monitoring of access to detect and respond to unauthorised activity.
- Regular review of security configurations and software updates.

8.2 Organisational measures

- Confidentiality obligations on all personnel and contractors who handle personal information.
- Training of personnel on privacy and information security responsibilities.
- Defined processes for onboarding and offboarding access to systems.
- Incident response procedures for suspected security breaches.

8.3 Residual risk

Despite these measures, no security system is completely effective. We cannot guarantee that personal information will never be subject to unauthorised access or loss. If an eligible data breach occurs, we will comply with the Notifiable Data Breaches scheme in Part IIIC of the Privacy Act, including notifying affected individuals and the OAIC where required.

9. How long we keep personal information

We retain personal information for as long as it is needed for the purposes for which it was collected, and for as long as we are required to retain it under applicable law.

In general:

- Client engagement records (including contracts, invoices, and correspondence) are retained for at least seven (7) years after the engagement ends, to meet obligations under taxation and company law.
- Prospective client records from marketing and outreach activities are retained until you request deletion or for two (2) years of inactivity, whichever comes first.
- TLKSource account data is retained during the subscription and for seven (7) years after termination.
- Website analytics data is retained for up to twenty-six (26) months.
- Anonymised aggregated data is retained indefinitely, as described in clause 6.

Where we no longer need to retain personal information and are not required to retain it by law, we take reasonable steps to destroy it or permanently de-identify it.

10. Cookies and website analytics

Our websites use cookies and similar technologies to operate, improve, and analyse use. Cookies we use include:

- Strictly necessary cookies required for the websites to function (such as maintaining your session when logged into TLKSource).

- Analytics cookies that help us understand how visitors use the websites (such as which pages are visited and for how long).

You can configure your browser to reject cookies, though this may limit functionality. Where we use analytics services, those services may place cookies set by the provider.

11. Automated decision-making

Our services involve automated analysis of freight data, including rate benchmarking and surcharge forensics performed by the TLKSource platform. These automated analyses are informational outputs — they describe variances, benchmarks, and patterns in the data. They do not make decisions that have legal or similarly significant effects on individuals.

To the extent we use AI-assisted tools (including services from Anthropic PBC) to respond to enquiries or analyse documents, those tools operate under our direction and do not make autonomous decisions about individuals. Human review is applied to any material decision affecting an individual's rights or obligations.

We will update this policy in line with the automated decision-making transparency obligations taking effect under the Privacy Act from 10 December 2026.

12. Your rights

12.1 Access

You have the right to request access to the personal information we hold about you. We will respond within a reasonable time (usually within 30 days) and may charge a reasonable fee for access if locating or compiling the information requires substantial effort. We will explain any fee before we proceed.

12.2 Correction

You have the right to request correction of personal information we hold about you that you believe is inaccurate, out-of-date, incomplete, irrelevant, or misleading. We will respond within a reasonable time and take reasonable steps to correct the information.

12.3 Withdrawal of consent and marketing opt-out

You may opt out of marketing communications at any time by using the unsubscribe link in any marketing email, by emailing us, or by contacting us using the details in clause 15. Opting out of marketing does not affect service-related communications necessary to operate your account or engagement.

12.4 Anonymity and pseudonymity

Where practicable, you may deal with us anonymously or using a pseudonym, for example when browsing our public websites. Providing services, issuing invoices, or entering into engagements requires identification of the legal entity involved and its authorised representatives.

12.5 How to exercise your rights

To exercise any of your rights, please contact us using the details in clause 15. We may ask for information to verify your identity before acting on a request.

13. Complaints

If you believe we have handled your personal information in a way that breaches the Privacy Act or this policy, please contact us using the details in clause 15. We will acknowledge your complaint within seven (7) days and respond substantively within thirty (30) days.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner (OAIC)	
Website	www.oaic.gov.au
Phone	1300 363 992
Mail	GPO Box 5288, Sydney NSW 2001

You do not need to attempt to resolve a complaint with us before contacting the OAIC, though we encourage it.

14. Children

Our services are business services directed at Australian shippers. We do not knowingly collect personal information from children under eighteen (18). If you believe we hold personal information about a child, please contact us and we will take reasonable steps to delete it.

15. Contact us

For any questions, requests, or complaints about this policy or our handling of personal information, please contact:

Privacy Officer	TLK
Email (AM Strategist matters)	andrew@amstrategists.com
Email (TLKSource matters)	hello@tlksource.com.au
Postal	Sydney, New South Wales, Australia

16. Changes to this policy

We may update this Privacy Policy from time to time to reflect changes in our practices, changes in law, or for other operational reasons. The current version is always available on our websites. The "Version" and "Effective from" details at the start of this policy indicate when it was most recently updated.

Material changes that affect how we handle personal information will be notified to customers and account holders before they take effect, where practicable.

Document control

Document	TLK Privacy Policy (unified)
Version	tlki-pp-v2-2026-04
Prepared	April 2026
Applies to	AM Strategist and TLKSource
Status	Draft — pending legal review
Framework	Privacy Act 1988 (Cth) as amended by POLA 2024; APPs 1–13
Next review	Following Sprintlaw redline and business sign-off

This document is a draft prepared for legal review. It should not be published on the websites until reviewed and signed off by qualified legal counsel.