

AUTOPACT GROUP PRIVACY POLICY

1. Background

Autopact Pty Ltd (ABN 44 608 040 606) and its subsidiaries (collectively, **we, us, our,** or **Autopact Group**) is an automotive dealership group selling new and used vehicles.

We are committed to protecting your privacy, in accordance with applicable Australian privacy laws. This Privacy Policy is designed to give you a greater understanding of how we collect, use, disclose and otherwise handle personal information.

This Privacy Policy applies to all individuals who interact with us (**'you/your'**), including everyone who visits or uses our websites, anyone who uses any of our products and services, investors, individuals who apply for a position with us and our staff. This Privacy Policy applies to our collection, use and other handling of your personal information.

2. What we collect

2.1 General

The type and amount of personal information that we collect about you depends on the type of dealings you have with us.

For example, depending on the context we may collect:

- your name;
- employment details
- your address;
- your location details (eg when you are doing a test drive);
- your telephone number
- your email address
- details of your social media profile
- your date of birth
- your driver licence number
- your vehicle details
- trade-in vehicle and payout details
- business details (e.g. ABN, facilities, organisational charts etc.)
- bank or credit card account details
- details of current or previous insurance (for motor insurance)
- health information (for life or disability insurance) any other relevant and necessary information to enable us to provide products and services to you and/or to support your purchase of any products or services.

2.2 Staff and job applicants

If you are working with us or applying for a position with us, we may collect human resources information including:

- emergency contacts
- education certificates and qualifications (eg first aid diploma, bachelor degrees);
- screening checks including health, reference, background, directorship, financial probity, identity, eligibility to

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- current and former employment details (eg pay rate and salary, leave entitlement)
- bank account details
- feedback from supervisors and referee reports
- work, vocational suitability and criminal record checks
- training records
- logs of your usage of our equipment, IT and work resources (e.g. phones, computers and vehicle).
- Biometric data for reporting and timekeeping purposes

2.3 Investors

We may collect information relating to your application or shareholding, e.g. the number of shares you hold or seek, any power of attorney you grant, your shareholder reference number or holder identification number and your tax file number if you choose to provide it.

2.4 Finance applicants

If you enquire about, apply for or obtain finance through us, we may collect additional information about you, and may exchange that information with the financiers that we work with. That information may include:

- salary, assets and personal finance information
- preferences in relation to loan options, features and amount
- credit scores and indicative finance quotes

We and the financiers we work with may also provide you with further information about the collection and handling of personal information by those financiers, including in relation to credit checks.

2.5 Collection of information through our websites

When you visit our websites, we collect certain information, including as described below.

Site visit information

For example, we record your server IP address, the date and time of your visit, the pages you visited, any documents you downloaded, the previous site you visited and the type of device, browser and operating system you used.

We use and disclose this information in anonymous, aggregated form, for purposes including statistical analysis and to assist us to improve the functionality and usability of our websites.

Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes.

We use cookies to hold session information. This information may be used to personalise your current visit to the website, for example to allow the website to remember who you are by keeping server variables linked to your session.

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Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. Rejecting cookies can, however, limit the functionality of our websites.

2.6 What if you don't provide us with your personal information?

We will provide you with the option of not identifying yourself, or of using a pseudonym, when dealing with us if it is lawful and not impracticable to do so. A pseudonym is a name or other descriptor that is different to your actual name. For example, you can generally access our websites and make general phone queries without having to identify yourself.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to provide you with the product or service that you are seeking. For example, you must identify yourself to purchase a vehicle.

3. How we collect personal information

3.1 Methods of collection

We collect personal information in a number of ways, including:

- in person (for example, when you come to one of our dealerships or events)
- through our websites (for example when you submit a request to receive our offers, to receive our brochures and/or other materials, through instant offer or to book a test drive)
- when you buy a vehicle from us
- through our Facebook page or other social media accounts
- over the telephone
- through written correspondence (such as SMS, letters, faxes and emails)
- in forms and materials about our vehicles, parts, accessories or services (for example, completed service forms, competition entry forms and surveys)
- from records of interactions and activity relating to us, e.g. online activity information as described above, through surveillance cameras at our dealerships (if applicable to the location), logs relating to our IT and work resources.

We may also collect personal information about you from third parties, including:

- manufacturers, distributors, authorised dealer network members and service providers (see under heading 'who we may share your personal information with' below)
- marketing organisations including through the use of industry databases
- recruitment agencies and referees
- credit providers (in connection with finance and related enquiries and applications)

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- publicly available sources such as the internet and telephone directories.

3.2 Collection notices

Where we collect personal information about you, we may provide you with additional details about that collection (such as the purpose for which we are collecting the information and the type of third parties to which it is usually disclosed), generally in a collection notice.

Collection notices provide more specific information than this Privacy Policy. The terms of this Privacy Policy are subject to any specific provisions contained in collection notices and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully.

4. Why we collect personal information

4.1 General

The main purposes for which we collect, hold, use and disclose personal information are set out below:

- promoting ourselves and original equipment manufacturers (OEMs) and each of our products and services, including through direct marketing, events and competitions (see under heading 4.2 below);
- managing ours and the OEM's relationship with you and to provide you with products and services;
- administering your vehicle's warranty;
- supporting you in making an application for finance or insurance for your vehicle;
- obtaining products and services for our business;
- operating our website;
- performing research and statistical analysis, including but not limited to for market research, customer satisfaction and service improvement purposes;
- protecting the health, safety and security of our offices, staff, customers and the property held on our premises;
- answering queries;
- monitoring performance and helping us and OEMs to manage our respective products, services and business operations;
- training ours and OEMs' respective employees, agents and representatives;
- recruiting staff and contractors;
- workplace management and administration;
- complying with our legal obligations (e.g. in relation to a vehicle safety recall and pursuant to laws including the Fair Work Act, Superannuation Guarantee (Administration))

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Act, the Income Tax Assessment Act and other tax laws, Corporations Act, occupational health and safety acts and workers compensation acts);

- for corporate transactions such as business mergers and acquisitions, (e.g. to assess or facilitate those transactions and manage the transition of the business); and
- in relation to investors, assessing applications, managing your investment and providing investor services;
- handling complaints and disputes;
- detecting, investigating and preventing fraud; and monitoring any unlawful or inappropriate activity in connection with our websites and resources.

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection, to which you have consented or which are required or authorised by or under law.

4.2 Direct marketing

We may use or disclose your personal information to let you know about us and our products and services (including promotions, special offers and events), either where we have your express or implied consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email, SMS, telephone, or online advertising.

Opting out

Where you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, by:

- contacting us using the contact details set out below;
- advising us if you receive a marketing call that you no longer wish to receive these calls;
- using the unsubscribe facility that we include in our electronic messages (such as emails, SMS and MMS messages).

5. Who we may share your personal information with

5.1 Within the Autopact Group

We share personal information with our related bodies corporate for the purposes described in section 4.1 above. For example, information about your vehicle's warranty status and service history may be stored in our record management system and accessed by other dealerships across our network to help when they service your vehicle in the future.

5.2 Disclosure to third parties

We may share personal information with third parties where appropriate for the purposes set out in section 4, including:

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- OEMs, who may use, disclose, share and store your personal information in accordance with their own privacy policy
 - vehicle manufacturers and distributors (e.g. in relation to retail delivery advice (RDA) on sale of a vehicle, warranty claims, recalls, capped price servicing, etc.)
 - financial institutions for payment processing
 - insurers
 - financiers
 - government, regulatory and law enforcement authorities
 - an individual's agent or authorised representative
 - your employer
 - referees whose details are provided to us by job applicants
 - our or the OEM's contracted service providers including roadside assistance, customer research, delivery and shipping providers, information technology and data storage providers, customer relationship management platforms, venues and event organisers, marketing and communications agencies, research and statistical analysis providers, call centres and mailing systems
 - external business advisers (such as consultants, recruitment advisors, accountants, auditors and lawyers)
 - the agent(s) of any of these entities referred to above
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6. Cross border disclosure of personal information

We may disclose personal information to third parties located overseas including the following recipients:

- vehicle manufacturers and distributors;
- external advisers; and
- service providers (including information technology service providers).

The countries where overseas recipients may be located will vary from time to time. For example, vehicle manufacturers are located in a wide range of countries including China, Czechia, Germany, Italy, Japan, South Korea, Sweden, the United Kingdom and the United States. Some overseas recipients may not be subject to Australian privacy law or substantially similar law or binding scheme.

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7. Data quality and security

7.1 General

We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant; and
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or phone number.

7.2 Security

The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to our computer systems (such as login and password protection), controlled access to our corporate premises and physical records, policies on document storage and security, personnel security (including restricting access to personal information on our systems to staff who need that access to carry out their duties), staff training and workplace policies.

We have policies to destroy files that are no longer needed after a certain period of time, subject to any record-keeping requirements imposed by law.

Online credit card payment security

We may from time to time process payments using EFTPOS and online technologies. All credit card transactions processed by us using those technologies use industry standard security measures to protect payment details.

Website security

While we endeavour to protect the personal information and privacy of users of our websites, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact us by telephone or post (details under heading 10 below).

Third party websites

Links to third party websites that are not operated or controlled by us are provided for your convenience. We are not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

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8. Access and correction

8.1 General

Please contact our Privacy Officer (details under heading 10 below) if you would like to access or correct the personal information that we hold about you. We may require you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

8.2 Access

We will generally provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (e.g. by providing photocopies), provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

8.3 Correction

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

We are not obliged to correct any personal information if we do not agree that it requires correction. If we refuse such a request, we will provide a written notice stating our reasons for refusal.

9. Complaints

If you have a complaint about how we have collected or handled your personal information, please contact us (details under heading 10 below).

We will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week. If we are not able to do so, we will ask you to submit your complaint in writing. In most cases, we expect to investigate written complaints and provide a response within 30 days of receipt. If the matter is more complex and our investigation may take longer, we will contact you and tell you when we expect to provide our response.

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (see <https://www.oaic.gov.au/privacy/privacy-complaints/> for further information).

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10. Our contact details

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details are set out below.

Mail: Autopact Pty Ltd
PO Box 1407
Mooloolaba QLD 4557

Email: ea@autopact.com.au

Telephone: 07 5373 3170

11. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. The current version will be posted on our website at <https://www.autopact.com.au/privacy-policy> and a copy may be obtained by contacting our Privacy Officer (details above).

This Privacy Policy was last updated on 10 November 2021.