



# PRIVACY POLICY

Understanding your Privacy Policy Documents:

V.25

“ We value your privacy and our policy”.

### Privacy Policy Introduction:

Sydney Automobiles Pty Ltd (ACN 120 164 472) and its wholly owned private company with its subsidiaries trading as Drive2go Car Leasing and Sydney Automobiles Financial Services or its franchisees (if any). We, our, us, Drive2go Car Leasing recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information.

This document is our combined Privacy and Credit Reporting Policy (Policy) and describes how we will comply with our obligations under the Privacy Act 1988 (Cth) (Privacy Act) in relation to the handling of your personal information, including in accordance with the Australian Privacy Principles (APPs), as well as how we comply with the credit reporting obligations contained in the Privacy Act and the Credit Reporting Code as registered under section 26S(1) of the Privacy Act.

When you lease with us, you consent to us collecting (including by in vehicle tracking through an In Vehicle Monitoring System), using and we may disclose your personal information in accordance with our Privacy Policy statement.

If we provide you with credit, our Credit Policy together with our Statement of Notifiable Matters.

### What types of information are covered by this policy?

Sydney Automobiles Pty Ltd, also trading as Drive2go Car Leasing is collecting your personal information for the purpose of providing you with the products and/or services you have requested from us. Some of the personal information we request is required by credit laws and regulations. If you don't provide your personal information we may not be able to process your lease quote or process your application for products or services that you have requested.

### Personal information:

This Policy sets out how we manage your "personal information". Certain parts of this Policy also apply specifically to "credit-related information". Section 7 of this Policy sets out these credit-specific obligations in more detail. When used in this Policy, the term "personal information" has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

### Credit-related information

In this Policy, the term "credit-related information" means credit information, credit eligibility information and credit reporting body (CRB) derived information as those terms are defined in the Privacy Act. Generally speaking, credit-related information will include your name and address, your contact details, your date of birth and gender, details of your credit history (including any repayments missed or late repayments that you have made, information about any credit provided to you by credit providers (such as financial institutions, utilities or telecommunications providers, any credit rating or credit assessment score that we have derived or that is provided to us by a credit reporting body and details of any credit-related court proceedings or insolvency applications that relate to you.

### Privacy Collection Statement

Sydney Automobiles Pty Ltd Trading Drive2go Car Leasing collects, uses, holds and discloses your personal information (which includes your name, address, telephone and other contact details) in order to prepare and submit insurance and finance applications that you (or your related company or other entity) wish to make to it or the Financiers, insurers and other third parties that Drive2go Car Leasing deals with or act on behalf of Sydney Automobiles Pty Ltd Trading Drive2go Car Leasing also collects, uses, holds and discloses this information to prepare quotes for you, to assess which third party products or services maybe most suitable for you and, if your application is successful or you accept a quote, to manage the business or other relationship with you (or your related company or other entity) and to arrange payment for the products and services that are supplied. If you choose not to provide your personal information to us, Drive2go Car Leasing may not be able to accept any applications, provide any quotes or enter into a business or other relationship with you (or your related company or other entity). Where relevant, Drive2go Car Leasing discloses your personal information to Financiers, insurers and other third parties that Drive2go Car Leasing acts for or on behalf of. Sydney Automobiles Pty Ltd may also disclose your personal information to its related companies, contractors, third party service providers, agents, government bodies and local authorities. Drive2go Car Leasing may also disclose your personal information to entities located outside of Australia, including to its data hosting provider and to other IT service providers, who are located in overseas.

### The kinds of personal information

We typically collect the following types of personal information about you:

- name; and or mailing or street address;
- email address; and telephone number;
- age or birth date;
- Medicare number, drivers' licence number, tax file number and passport number (which may also include the other details which appear on your Medicare card, driver licence and passport if supplied pursuant to our identity verification and processes.
- Profession, occupation or job title, together with other relevant employment details (such as your salary);
- information about your source(s) of income and your expenditure details;
- information about your assets and liabilities;
- third party account details (for example where you sign in through a social network);
- your public social profile information (e.g. name, profile picture) together with the email address you use to log into your social media account;
- any other information that you provide to us in person, including at our offices or during visits by our representatives;
- personal information you may provide to us if you are applying for employment with us that is relevant to such employment (such as your qualifications and work history); and personal information you may provide to us if you participate in any surveys

### Sensitive Information

Some of the personal information we collect or hold about you as described in section above of this Policy, such as health records which appear on your driver's licence, your tax file number or your passport number may be classified as 'sensitive information' under the Privacy Act. We only collect or hold such sensitive information to the extent it is reasonably necessary for one or more of our functions or activities. You expressly provide your consent to providing us with this sensitive information, so that we may carry out one or more of our functions or activities related to that collection. We will only collect, use and disclose sensitive information about you in the course of considering an application for recommendation, subject to obtaining your prior specific consent at the relevant time.

### Personal information you provide about someone else;

We might also ask you to provide us with personal information about another person, for example: personal and financial information about a joint applicant for any finance you are seeking;

- the name and contact details of your accountant; and
- where we ask you for a personal or trade reference, the name and contact details of your referee and their relationship to you.

If you provide us with personal information about another person, you should tell that person about this policy and let them know that their information has been provided to us.

### Information which is not personal information

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website. This Lease Contract does not apply to such information.

### Reporting GPS Location Services Information

We may monitor or track the location of the vehicle whilst it is in your possession at any time without further notice to you. GPS Tracking device has been fitted to all vehicles to enable us to monitor, track locations, maintain GEO fencing boundaries, locations history and or disable vehicle power supply for purpose of asset recovery. We may collect and share location information with authorities and or service agents to conduct further investigations for verifications and trace of personal information, including sensitive information, you provide over the phone or otherwise, will be handled in accordance with this Privacy Policy.

### How do we collect and hold your personal information

Generally we collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in ways including:

- through your access and use of our website and online applications;
- via e-mail and via documentation provided to us electronically, in person, by mail or by fax;
- over the telephone or during conversations between you and our representatives; or
- when you complete a finance application, whether on our website or via telephone.

### Collecting personal information directly from third parties and group companies

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

- entities which provide services to us (such as providers of identity verification services);
- any third party who refers you to us;
- your accountant, any referees you provide or we request and any joint applicants for finance;
- your nominated referees and former employer if you are applying for a role with us;
- entities within the Drive2go Car Leasing Network in order to personalise your experience with us as further detailed in this Policy; or
- from third party companies such as credit reporting bodies, providers of title search services, law enforcement agencies and other government entities.

### How we hold your personal information

We hold information in paper-based files or other electronic record keeping methods in secure physical and online databases based in Australia. We take reasonable steps to ensure that the personal information and credit related information that we collect, use and disclose about you is accurate, complete and up-to-date and, in relation to the purpose of our use or disclosure, relevant. Personal information and credit-related information is destroyed or de-identified when no longer needed or where we are no longer required by law to retain it (whichever is the later). We have implemented controls around technology and our organisational processes to assist us in protecting your information from misuse, interference and loss and from unauthorised access, modification or disclosure. This includes having in place confidentiality requirements for employees and contractors, as well as implementing document storage security policies, document retention policies and systems and site access restrictions.

### Credit Reporting Policy:

We may refer and assist to provide consumer hire purchase lease as hire purchase asset to individuals as agent for our financiers, and this policy will apply in such circumstances. We may conduct (or our financiers may conduct) a credit check on you and any joint account holders (or for corporate customers, any directors, partners or other authorised representatives) before credit is provided to you.

The Privacy Act and this policy do not apply to commercial credit provided to companies or other entities. However, this policy will apply where an individual applies for commercial credit or we or our financiers request that a director or other authorised individual guarantees the commercial credit to be provided by us to a company or other entity. This policy will only apply in respect of any uses of individuals' credit-related information as part of any assessment of the creditworthiness of that individual that we or our financiers undertake and any consideration that we or our financiers undertake in relation to an individual's suitability as a guarantor.

Collection of credit-related information In addition to collecting personal information about you, we may collect the following particular types of credit-related information about you:

- your name and address (including previous addresses);
  - your contact details (including telephone and email addresses);
  - your date of birth and gender;
  - your credit history, credit rating or credit assessment score provided by a credit reporting body (including account conduct both positive and negative such as any repayments missed or late repayments that you have made)
  - details of any credit provided to you by other credit providers (such as other financial institutions, utilities or telecommunications providers);
  - details of any credit-related court proceedings or insolvency applications that relate to you; and
  - any other personal information or credit related information reasonably required for the purpose of determining whether we or our financiers will provide any credit to you (or to your related company or other entity).
- We may obtain this information from you or from third parties, including from credit reporting bodies and other credit providers, in order to assist us in determining whether we or our financiers will provide any credit to you (or to your related company or other entity).

## Our use and disclosure of your credit-related information

We may use the credit-related information that is collected and held by us to help us and our financiers decide whether or not to provide credit to you (or to your related company or other entity). The credit reporting bodies that we deal with including, but not limited to Equifax Pty Ltd. You may contact Equifax by telephone on (13 83 32); or online at <https://www.equifax.com.au/contact>. Equifax's credit reporting policy is available at <https://www.equifax.com.au/credit-reportingpolicy>

You have a right to obtain a copy of the credit reporting policies of any credit reporting bodies that Stratton disclose your credit-related information to, and you can contact them directly using the contact details set out above to obtain a copy in an alternative format. The credit-related information that we hold about you may be used by us in accordance with Part IIIA of the Privacy Act and the Credit Code.

The purposes for which we use your credit-related information may include:

- using your credit-related information to assess any application that you make to us or our financiers for credit (or which is made by your related company or other entity);
- using your credit-related information to collect payments that are owed to us or our financiers in respect of any credit that we or our financiers have previously provided to you (or to your related company or other entity);
- disclosing your credit-related information to any of our related companies, including any entity in the Drive2go Network, that are also considering whether to provide credit to you (or to your related company or other entity);
- where you have offered to guarantee credit that we or our financiers have offered to provide to your related company or entity, to assess your suitability as a guarantor of that credit;
- disclosing your credit-related information to a third party that you or we ask to act as a guarantor of any credit provided to you;
- disclosing your credit-related information to the credit reporting bodies that we deal with, including but not limited to Equifax Pty Ltd and Dun & Bradstreet Inc. Credit reporting bodies collect different types of credit-related information about individuals and use that information to provide a credit related service to their customers (including to us);
- disclosing your credit-related information to our financiers in connection with any credit that you seek;
- disclosing your credit-related information to other third parties that provide services to us (or to you on our behalf). These might include debt collectors, credit management agencies and other third parties that process applications for credit made to us or which provide identity verification services to us;
- disclosing your credit-related information to other credit providers which provide, or are considering providing, credit to you (or to your related company or other entity);
- using and disclosing credit-related information that we hold about you to assess and respond to any access or correction requests that you make to us;
- where we are consulted by a credit reporting body or another credit provider about an access or correction request that you have made to those entities, to respond to that consultation request;
- where you complain to the Office of the Australian Information Commissioner or any provider of a recognised external dispute resolution scheme about our treatment of your credit-related information, to respond to that complaint and to seek legal or other professional advice in relation to your complaint;
- using and disclosing credit-related information that we hold about you as required by law or the order of a court or tribunal; and where you otherwise expressly consent to the use or disclosure.

## Direct marketing

What is the purpose of our direct marketing?

We may use or disclose your personal information for the purpose of direct marketing including:

- to share your information within Sydney Automobiles Pty Ltd Group (including with our related body corporates, the entities in the Drive2go CarLeasing and their franchisees) and other select companies, so that our other divisions and businesses may also contact you or offer you complementary or other products and services including in the manner described in this Policy including more relevant advertising content;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of us and our related bodies corporate, contractors or service providers;
- to assist the performance of, and to improve, any marketing and advertising campaigns that we conduct (including on behalf of our financiers or other business partners) as well as assessing the performance of our website;
- We undertake this direct marketing in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth), and APP 7 which relates to direct marketing.

## How do I opt out of direct marketing communications?

If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. If we do commence sending any direct marketing to you, you may amend or opt-out of receiving marketing communications from us by:

- using the unsubscribe process available within email communications or emailing [support@drive2go.com.au](mailto:support@drive2go.com.au)
- Changing your communication preferences within the preference accessible via email communications

## Our website and online applications

This policy also applies to any websites that we operate from time to time, including our websites at [www.drive2go.com.au](http://www.drive2go.com.au) (and any sub-domains of those websites). This policy will cover any personal and credit-related information you provide to us using any of our websites.

## How do we linked sites record my activity and use it?

When you visit one of our websites or use one of our applications, or in response to a survey, promotion or competition, Sydney Automobiles Pty Ltd and other entities in the Drive2go Network typically record anonymous information such as IP address, time, date, referring to url and other referral information, device information and location, carrier, site interactions such as your access to website features, pages accessed, content, searching activities, lead submission, and files accessed and downloaded, type of browser and operating system, and other clickstream information.

## Cookies and other online behavioural technologies and methods

We use "cookies" and other online behavioural technologies and methods to collect and store the information set out above. A cookie is a small file that stays on your computer until, depending on whether it is a sessional or persistent cookie, you turn your computer off or it expires (this may be as little as 30 days or up 2 years or longer in some cases). Cookie data and other data may be sold, licensed or otherwise provided to third parties via advertising exchanges or other data sharing platforms for this purpose. If you do not wish to receive any cookies you may adjust your browser (such as Firefox, Google Chrome, Internet Explorer or Safari) to either prompt or refuse cookies. If you disable cookies we may not be able to provide you with our full range of products and services and not all the functions on our websites and applications will be available to you.

## Security

As our websites and applications are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. Where appropriate, we use Secure Socket Layer (SSL) technology to encrypt the transmission of information to us. However, we cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Any personal information or other information which you transmit to us online is transmitted at your own risk.

