

## **Privacy Policy**

### **Your Privacy is our Policy**

This policy outlines our obligations in managing personal information we hold about customers, potential customers, contractors and others who come into contact with us and our related companies. We want your experience with us in both our online and offline environments to be enjoyable and we take care to respect your privacy.

We are bound by the Australian Privacy Principles ('APPs') contained in the Privacy Act 1988 (Cth) ('Privacy Act') that require us to handle your personal information responsibly. 'Personal Information' is defined within the Privacy Act as information or an opinion about an individual, which can be used to identify that individual.

### **Why does Trivett collect Personal Information?**

The primary purposes for which we collect your personal information include:

- to provide and market our products and services;
- to inform you of special offers and events and to facilitate and process your acceptance order of any special offers, products and services;
- to create a better, more personalised experience for you; and
- to help us manage and enhance our products and services.

Generally, we use the information we collect about you for the primary purpose for which it is collected and for reasonably expected secondary purposes. We limit the collection of sensitive information about customers (e.g. ethnic origin, political opinions, etc.) because, in general, it is not necessary for what we do.

We also takes reasonable steps to provide clear, complete and up-to-date information about our business and the products and services we offer. This includes how to get in touch with us. This information helps you to make informed choices.

If you do not wish to provide us with personal information, this may result in us being unable to provide you with our products and services, e.g. customer personal information is required by us to register vehicles; test drives and loan cars are only available to customers who provide personal information and a copy of their driver's licence; customer personal information is required to ensure that we (and the vehicle manufacturer) can contact customers for matters relating to vehicle safety and recalls.

If you have a concern with the collection or use of your personal information you can notify us of your concern, make a complaint, obtain redress or pursue dispute resolution by simply contacting the Privacy Officer using the details set out below.

### **What kinds of Personal Information does Trivett collect?**

In general, the type of personal information we collect and hold includes but is not limited to; names, addresses, contact details, occupations, drivers licence details and other information that will assist us in providing our products and services.

## **Collection, Access & Correction**

When we collect your personal information we endeavour to:

- tell you whom we are and what we intend to do with your information when we receive it. We strive to be open - upon request we will let you know what sort of personal information we hold about you, how we collect it and how we use and disclose it. Subject to the Privacy Act you may request access to the personal information we hold about you by contacting the Privacy Officer via the details set out below (Note: We will require you to verify your identity and to specify the information that you require. A small fee may be charged for providing access. We will advise the likely cost in advance.)
- take steps to ensure that your personal details are accurate, complete and up-to-date when we use or collect them. You have the right under the Privacy Act to request changes to your personal information. We encourage you to contact us in order to update any personal information we hold about you using the Privacy Officer contact details set out below.
- collect personal information only by lawful and fair means generally by forms filled out by you (whether on-line or in hard copy), face-to-face meetings, interviews, business cards and third parties (e.g. companies we contract to collect data on our behalf). From time to time, we may also collect non-personal information e.g., information specific to a vehicle or model. This helps us in our ongoing efforts to improve our products and services.

We may also monitor your usage of our web site to make improvements and provide other items you might want to know about. We may also use third parties to analyse traffic on our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

As much as reasonably possible, we will collect personal information directly from you, although we may from time to time also use external sources that are legally entitled to disclose and use your personal information.

### **Analytic, session and cookie tools**

We use a range of tools provided by third parties, including Google, to collect or view website traffic information. These sites have their own privacy policies. We also use cookies and session tools to improve your experience when accessing our websites.

The information collected by these tools may include the IP address of the device you are using and information about sites that IP address has come from, the pages accessed on our site and the next site visited. We use the information to maintain, secure and improve our websites and to enhance your experience when using them. In relation to Google Analytics you can opt out of the collection of this information using the Google Analytics Opt-out Browser Add-on.

Third parties may use cookies to collect information about the content you view on our website in order to make the advertising that you see on third party websites more relevant to you. If you wish to opt out, most Internet browsers allow you to change your settings to manage or block cookies. Please note that this may limit your ability to use personalised features that we offer.

## **Social Networking Services**

We use social networking services such as Twitter, Facebook and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites also have their own privacy policies.

## **Personal Information Disclosure**

We may disclose your personal information to:

- our related companies;
- the manufacturers of vehicles that we sell;
- insurance companies;
- credit providers and credit reporting bodies who may use or disclose your personal information to determine your credit worthiness;
- state government entities responsible for motor vehicle registrations and driving infringements;
- other companies or individuals who assist us in providing services or who perform functions on our behalf (such as mailing houses) who are generally contract bound to protect your privacy;
- law enforcement bodies such as the Police, who seek access to your personal information for law enforcement purposes; and
- anyone else to whom you have authorised us to disclose it.

We may also collect your personal information from these companies and individuals, in which case we will deal with this information in accordance with this Policy.

Unless otherwise required or permitted by law, if we disclose your personal information to others we will only do so with your consent (implied or express), and we will also take steps to ensure the party to whom we have disclosed your information agrees to protect the privacy of your personal information.

## **Sending Personal Information Overseas**

Some of the entities to whom we may disclose your personal information are located outside Australia. We take steps to ensure that such recipients respect the confidentiality of this information by abiding by the APPs or equivalent privacy laws.

These entities include manufacturers of our brands (UK, Singapore, USA and EU), our parent company (UK), and our CRM provider (UK).

Other than as stated above, we will not send your personal information to recipients outside of Australia without:

- obtaining your consent (in some cases this consent will be implied); or
- otherwise complying with the APPs.

## **Electronic Communications**

The Spam Act 2003 (Cth) prohibits the sending of commercial electronic communications without the consent of the person to whom the communication is being sent. In line with our commitment to technology (but within the parameters of the law) we like to accommodate customers who wish to be contacted by way of electronic communications. These communications may be sent for any of the purposes mentioned above. At the point of collection of personal information we may request the mobile phone number or the email address of our customers. Where customers provide these details, we will also request the consent of an individual to use these details for commercial electronic communications via SMS and email. Whenever such messages are sent to a customer we will always provide the customer with the option of opting out of receiving similar communications in the future.

## **Do Not Call Register**

The Do Not Call Register Act 2006 prohibits the making of telemarketing calls (as defined in the legislation) to numbers listed on the Do Not Call Register. In line with our commitment to corporate compliance, we will only contact numbers that appear on the Do Not Call Register in the limited circumstances allowed by the Do Not Call Register Act 2006 and the Telecommunications (Do Not Call Register) (Telemarketing and Research Calls) Standard 2007, such as where you have given us the requisite consent to do so. Where you give us express consent to contact you by telephone we will deem it to be supplied for an indefinite period for the purposes of the Do Not Call Register Act 2006, unless otherwise advised or withdrawn by you.

## **Opting Out**

We always provide individuals with an opportunity to "opt-out" of receiving direct marketing communications from us. If you have received a direct marketing communication from us and don't wish to receive these communications from us in the future, just use the "contact us" form on our website or write to or email the Privacy Officer using the details set out below and we will take appropriate steps to ensure your details are added to our 'Do Not Mail' list to ensure you will not receive any future direct marketing communication from us. We do not send direct marketing communications to customers who have opted out of receiving such information.

Please note that your details will be retained in the event that we may need to contact you in relation to such matters as vehicle safety, recalls, warranty and for requirements specified by law.

## **The Security of Trivett's System**

We take all reasonable steps to protect the security of personal information collected by us. We understand that customers require peace of mind when it comes to the security of providing their personal information to us. We have internal methods to ensure that your personal information is safe and protected against misuse, loss or unauthorised access, modification or disclosure. Where we no longer require your personal information for a permitted purpose under the APPs, we will take reasonable steps to destroy or suppress your personal information.

## **Complaints**

If you have a concern with the collection or use of your personal information you can notify us of your concern, make a complaint, obtain redress or pursue dispute resolution by contacting the Privacy Officer using the details set out below.

The Privacy Officer shall review, investigate and respond to any privacy complaint within 10 working days of receipt of such complaint. The Privacy Officer will advise the complainant if this time frame cannot be met, usually where the complaint is complex or requires more extensive investigation.

## **Employee Records**

Due to an exemption in the Privacy Act this policy does not apply to our treatment of an employee record, where that treatment is directly related to the current or former employment relationship between us and the individual.

## **Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. We will at all times make available any information regarding our Privacy Policy to anyone who requests it, whether at our offices, or by our website.

## **Trivett**

This policy applies to Trivett Automotive Retail Pty Limited ACN 000 806 904

## **Trivett's Contact Details**

We welcome your questions and comments about our handling of your personal details and this Privacy Policy.

Please let us know by using the 'contact us' form on our website. You may also contact our Privacy Officer at:

### **Privacy Officer**

Email: [privacy.officer@trivett.com.au](mailto:privacy.officer@trivett.com.au)

Postal address: Att: Privacy Officer

Trivett

Level 2, 4 Burbank Place

Baulkham Hills NSW 2153