

# PRIVACY POLICY

## MANAGEMENT OF PERSONAL INFORMATION

At Regent Motor Group, we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles (“APPs”) as contained in the *Privacy Act 1988* (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

“Personal information” is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

This policy details how Regent Motor Group manages personal information about you.

In the course of doing business, we endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable.

### **What personal information we collect and hold**

The kinds of personal information we collect from you or about you depend on the transaction you have entered into with us, the goods / services you or your organisation have contracted us to provide, and the goods / services you or your organisation are interested in.

The kinds of personal information that we commonly collect and hold from you or about you include: your name, address, phone, fax and mobile numbers, email address, date of birth, drivers licence details, bank account details, credit card details, vehicle details, vehicle registration, vehicle maintenance history and vehicle financing details.

When you browse our website or contact us electronically, we may record: geographical tagging, cookies, and statistical data.

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

### **How we collect and hold personal information**

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from:

- correspondence that you submit to us;
- telephone calls and meetings with us;
- vehicle sale and purchase contracts, vehicle or parts / accessories order forms, finance applications, vehicle service and maintenance requests and warranty requests that you submit to us;
- questionnaires and feedback surveys that you complete;
- your participation in our interactive membership, rewards and loyalty programs; and
- your activity on our website and social media platforms.

However, in some instances, we may receive personal information about you from third parties, such as our Head Office or franchisor and the manufacturer of your vehicle.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

### **Why we collect, hold, use and disclose personal information**

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities. For example, we collect, hold, use and disclose your personal information as necessary to conduct vehicle inspections and test-drives, to sell or trade in vehicles, to provide vehicle servicing, repairs and warranty, to assess vehicle financing applications or to refer you to vehicle financing businesses, and to administer our rewards programs.

Our business is part of a franchise network. We routinely disclose your personal information to our franchisor as part of the operation of the franchise network.

Within our business, we also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, ID checks, record keeping, vehicle service work, warranty and repair work, vehicle financing, the operation of our rebate and loyalty schemes, statistical collation, social media analysis and website traffic analysis. We also collect, hold, use and disclose your personal information for the purposes of marketing and promotions, providing you with information about other goods and services offered by us, newsletter communications, market research and feedback surveys and questionnaires.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

We operate various marketing and promotional campaigns, either through our own business or with the assistance of external marketing agencies and other contractors. Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including government departments and vehicle registration authorities) where required or permitted by law.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the goods / services that you or your organisation have contracted us to provide.

### **How we hold and store personal information**

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure:

- Data held and stored on paper is stored in lockable filing cabinets, lockable offices and secure premises with monitored alarms.
- Data held and stored electronically is protected by internal and external firewalls, and limited access to data via file passwords.

- Data held and stored “in the cloud” is protected by internal and external firewalls and limited access via file passwords. We also require our IT contractors and other third parties to implement privacy safeguards.
- Data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards.
- Where we disclose personal information to third parties (including our Head Office, franchisor and other affiliated businesses located locally and overseas), we take reasonable steps to ensure that our contractual arrangements with them include specific privacy requirements.
- Our staff receive regular training on privacy procedures.

### **Destruction and De-identification**

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed:

- Paper records are commonly sent for secure destruction.
- Electronic records are deleted from all locations, to the best of our ability, or encrypted and/or placed beyond use.

### **Requests for access and correction**

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please contact us on [privacy@regentmotors.com.au](mailto:privacy@regentmotors.com.au).

To assist us to keep our records up-to-date, please notify us [privacy@regentmotors.com.au](mailto:privacy@regentmotors.com.au) of any changes to your personal information.

### **Complaints and Concerns**

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs. For further information, please contact us [privacy@regentmotors.com.au](mailto:privacy@regentmotors.com.au).

### **Contact**

Privacy Officer

(08) 9273 1006

[privacy@regentmotors.com.au](mailto:privacy@regentmotors.com.au)

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