

# Sunco Motor Group Privacy Policy

Sunco Motors Pty Ltd ACN 010 722 111 and its Related Bodies Corporate as defined by the *Corporations Act 2001* (Cth) (**Sunco Motor Group, we or us**) respects your privacy and is committed to protecting it.

We comply with the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (**Privacy Act**), which govern the way private sector organisations collect, use, keep secure and disclose personal information.

The Privacy Act defines “personal information” to mean any information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true; and whether the information or opinion is recorded in a material form.

This Privacy Policy sets out how we handle your personal information. If you have any concerns or questions, please contact us at the address set out later in this policy and our privacy officer will resolve your concern or answer your question.

We recommend that you keep this information for future reference.

## **What kind of personal information do we collect and hold?**

Where you contact us to make an enquiry about purchasing, trading, servicing or selling a vehicle, or engage with us to perform any of these activities, the personal information we may collect include:

- your contact details (including your full name, date of birth, postal and/or physical address, billing address, email address and telephone number and so on);
- your driver licence details;
- details about your vehicle including the vehicle identification number (VIN), registration date, registration number, number plate and so on;
- your financial information, including your billing address, bank account and other billing details, credit or debit card details (as relevant to your transaction); and
- any other personal information you choose to disclose to us in the course of your enquiry with us.

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your personal information directly from you.

We may collect your personal information from you in a variety of ways, including by email, website and hard copy forms. When you engage in certain activities, such as submitting an enquiry with us, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our products or services to you, we may be unable to provide our products or services to you in an effective manner, or at all.

## **Why do we collect, hold and use personal information?**

The uses we make of your personal information will vary depending on the reason for which your information was collected. For example, if you contact us to make an enquiry about purchasing, trading, servicing or selling a vehicle, or engage with us to perform any of these activities, we may use your personal information to:

- provide customer service functions, such as answering any query you may have asked of us;
- provide you with our services, such as the sale, trade, purchase or service of new or used vehicles;
- facilitate payment and refunds in relation to our services;
- arrange insurances and warranties on your behalf;
- perform administrative and management functions conducted by Sunco Motor Group, such as the maintenance and development of our services, business systems and infrastructure and quality assurance activities; and
- conduct marketing activities, as discussed in further detail below.

We will only use or disclose your personal information for the primary purposes for which it was collected, or as otherwise consented to by you.

At or around the time we collect personal information from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information.

From time to time, Sunco Motor Group will contact you and to let you know about our products and services, including special offers. You give your express and informed consent to us using your personal information to provide you with information and to tell you about our services or events, or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS or other messaging applications (**Direct Marketing Communications**).

If you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

If at any time you do not wish to receive any further Direct Marketing Communications from us, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out in this document.

#### **Do we disclose your personal information to anybody?**

Sunco Motor Group may disclose your personal information in certain circumstances, for instance, where we are required or authorized by law to disclose your personal information.

If you contact us to make an enquiry about purchasing, trading, servicing or selling a vehicle, or engage with us to perform any of these activities, we may disclose your personal information:

- to third parties to check whether and how, your vehicle is encumbered;
- during the registration or transfer of a vehicle, or to an insurance company transacting Compulsory Third Party insurance;
- where we are servicing your vehicle, to the suppliers of parts;
- to the manufacturer or distributor of the vehicle you have purchased to ensure the proper registration of warranty details for the protection of your vehicle, or where required in the servicing of your vehicle.

## What if I am seeking employment with Sunco Motor Group?

Where you are seeking employment with us, the personal information we may collect includes:

- contact information, such as your name, e-mail address, current postal and residential address, phone numbers, country of residence, next of kin contact details;
- employee record information;
- identifying information, such as your photo, passport and residency details, date of birth, licence;
- your CV, resume or application related information, such as details provided in your resume, your eligibility to work in Australia, your visa details, education, previous employment details, professional memberships or other qualifications;
- tax, superannuation and payroll information, such as your tax file number and ATO declaration, superannuation details and financial institution details;
- background check information including information obtained from you or third parties to perform background checks;
- medical or health information which you voluntarily provide to us as part of pre-employment or back-to-work medicals or such other information which may be related to an incident which has occurred during the course of your employment or engagement with us;
- performance related information including pre-employment testing, referee information and other information collected by our systems in the course of your engagement with us; and
- security information, such as CCTV footage and photographs taken on the premises of our dealerships.

Personal information collected in this instance may be used for pre-employment screening purposes, including verifying your identity, assessing your application for employment, conducting background checks and confirming your education, previous employment and eligibility to work in Australia.

We may disclose this information to third parties such as your nominated superannuation company, government agencies, including but not limited to The Australian Taxation Office, Centrelink and Department of Human Services, a relevant Worker's Compensation organisation (e.g. WorkCover), third party referees provided by you in connection with an application made to Sunco Motor Group, aervice providers and suppliers engaged to assist Sunco Motor Group in the administration of its business (including IT service providers, HR software provider and payroll providers), if any, recruitment agents used in connection with your application with us, third parties in connection with the sale of any part of Sunco Motor Group's business or any investment in or by our company, third party parties in connection with obtaining any background checks, or pre-employment screening, financial institutions for payroll purposes or third parties, such as courts or other entities to which we are required or authorised by law to disclose personal information.

Some of the information noted above falls into the category of 'sensitive information'. Sensitive information is a subset of personal information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

In general, we attempt to limit the collection of sensitive information we may collect from you, but depending on how you interact with us this may not always be possible. However, we do not collect sensitive information from you without your consent.

We use sensitive information for the following limited purposes:

- (a) criminal records for pre-employment screening purposes; and
- (b) medical information, voluntarily provided, to determine fitness for work or address an accident that has occurred on our premises.

### **Ensuring your personal information is up to date**

Sunco Motor Group relies upon the personal information we hold about you to efficiently conduct our business of providing motor vehicle sales and services. For this reason it is extremely important that the information we collect is accurate, complete and up to date.

During the course of our business relationship with you, we may ask you, from time to time to tell us of any changes to your personal information; however, you may contact us at any time to furnish us with changes to your personal information.

### **Is my personal information secure?**

The protection of your personal information is a priority for Sunco Motor Group.

We take all reasonable precautions to safeguard your personal information from loss, misuse, unauthorized access, modification or disclosure.

Sunco Motor Group employs a number of means to protect your personal information including:

- restricted staff access to personal information;
- entrance into confidentiality agreements with employees, contractors and third party organizations; and
- regular reviewing and testing of our technology in order to improve the levels of security.

### **Can I access the personal information Sunco Motor Group holds about me?**

You may request access to any of the personal information we hold about you.

In most cases, a summary of personal information such as your name and address details, contact telephone numbers are freely available to you by contacting any one of our branches.

All requests for access to personal information will be handled as quickly as possible and we shall endeavour to process any request for access within 30 days of having received the request. For requests for information which may be held in archives, a fee may be charged to cover the cost of retrieval and the supply of the information to you.

Sunco Motor Group may be required by law to retain your personal information for a period of time after you have finished a relationship with us. After the required time has passed, we will attend to the destruction or deletion of your personal information.

If you would like to access the information we hold about you or more information on our Privacy Policy, please contact us via the contact details noted below in this document.

### **Do we disclose your personal information to overseas recipients?**

We do not generally disclose or transfer personal information to overseas recipients. However, we may utilise third party service providers to assist us with the administration of our business and the provision of our goods and services to you who are located, or have servers housed, overseas.

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above.

By submitting your personal information to us or otherwise dealing with us, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information. However, we will take steps to ensure that your personal information is used by third parties securely and in accordance with the terms of this Privacy Policy.

If you do not agree to the disclosure of your personal information outside Australia by us, you should (after being informed of the cross border disclosure) tell us that you do not consent by contacting us on the details listed in this document.

### **How can I make a complaint about a breach of the Australian Privacy Principles?**

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, please use our contact form. Alternatively, you can contact us by post at:

Attn: Privacy Officer  
1 Industrial Avenue,  
Caloundra QLD 4551

or by phone on 07 5436 7000.

In order to resolve a complaint, we:

- (a) will liaise with you to identify and define the nature and cause of the complaint;
- (b) may request that you provide the details of the complaint in writing;
- (c) will keep you informed of the likely time within which we will respond to your complaint;  
and
- (d) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

### **What happens if this Privacy Policy is updated?**

By using our website or otherwise providing us with your personal information, where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

- (a) to provide the consents given by you in this Privacy Policy; and

(b) that you have been informed of all of the matters in this Privacy Policy.

We reserve the right to modify our Privacy Policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on our website). If you do not agree to our continued use of your personal information due to the changes in our Privacy Policy, please cease providing us with your personal information and contact us via the details set out at the top of this document.