**Suttons**
FAMILY OWNED SINCE 1943

# DEALERSHIP STAFF TRAINING
## PROTECTING CUSTOMER PRIVACY
## CARS

*Protecting our customers' personal information is not just a policy—it's a legal obligation and fundamental to maintaining their trust. This handout outlines your key responsibilities.*

## 1. LOCATING OUR PRIVACY POLICY

A copy of our privacy policy **is available to everyone on each dealership location's website**, or **www.suttons.com.au/privacypolicy.**

**DO YOU KNOW WHERE TO FIND OUR PRIVACY POLICY?**

Visit our website and confirm you know how to find and refer to the Suttons Privacy Policy.

**SCAN TO VIEW OUR PRIVACY POLICY**


*Suttons Privacy Escalation Process*

## 2. THE PRIVACY ESCALATION PROCESS

Identified a privacy risk? If you see something wrong, or a customer flags an issue, **escalate it to your manager immediately.**

**DO YOU KNOW WHERE TO FIND THE PRIVACY HUB?**

Visit the **Privacy Hub** to find and refer to our internal **Privacy Escalation Process.**

**SCAN TO VIEW THE SUTTONS PRIVACY HUB**


## 3. REISSUING DOCUMENTATION - CONTRACTS OF SALE

⚠ ***INFORMATION MUST ONLY BE RELEASED TO THE ORIGINAL CUSTOMER.***

**ASSISTANCE AVAILABLE** If you have any questions about a privacy request or need support, visit the Privacy Hub **suttons.com.au/privacy-hub**

**VERIFY IDENTITY – MANDATORY BEFORE RELEASING ANY DOCUMENT.** Request the following and confirm against the original customer record:

Full name AND email or phone number on file (exact match required)

**Third Party Requests** - Do not release documents to a third party without the customer's written authority.

**Internal Documents** Do not release internal documents (e.g., warranty documentation, internal notes).

**Customer Rights** Under Australian privacy law, customers are entitled to access their personal information - including past invoices and contracts - upon request.

## 4. STORING AND ACCESSING CUSTOMER DATA

All customer data ***must*** be accessed and saved **exclusively through Suttons-authorised platforms**, using your company-issued login credentials.

Approved platforms include (but are not limited to):

**Microsoft applications,** *e.g. Outlook, Teams, Sharepoint*

**Business CRM applications,** *e.g. DealerSocket, eraPower, Drive Expert*


## STRICTLY PROHIBITED

**Storage of Suttons customer data on local storage (i.e. camera roll, photos of licences, customer contacts etc.), downloads, or any offline saving of company data to personal devices is strictly prohibited.**

Should a breach occur from this, you could personally be fined $66,000 per breach, with potential for further, more significant fines to be faced by Suttons. See overleaf for more details.

CURRENT VERSION: v1.0 02/26

## 5. ACQUIRED VEHICLE DATA DE-IDENTIFICATION

For every vehicle that comes into our possession, we are required to take reasonable steps to destroy or de-identify any personal information. This ensures that no private data is ever passed on to or accessed by the next owner.

RESPONSIBILITY OF _____ DEPARTMENT
Department Name

**Legal Requirement**
When we acquire any vehicle (trade-in, purchase, or private source), it is our legal responsibility to remove all customer personal information from it.

**Inspect All Documents**
Before selling or wholesaling, check inside logbooks, service invoices, and warranty papers. Remove or permanently black out any customer contact details found.

**Clear All Systems**
Don't stop at paperwork. Delete personal data from on-board electronics, including sat-nav history, Bluetooth pairings, and stored phone contacts

### SPOT AN ISSUE?

***Identified a privacy risk? If you see something wrong, or a customer flags an issue, escalate it to your manager immediately.*****

### REVIEW THE POLICY

***Familiarise yourself with the full Suttons Privacy Policy here: suttons.com.au/privacypolicy***

### NEED HELP?

***If you have a query about a privacy request or need support, visit the Privacy Hub: www.suttons.com.au/privacy-hub***

## 6. PENALTIES FOR A PRIVACY BREACH

| Entity | Maximum Penalty | Trigger |
|---|---|---|
| **Company (Financial)** | **$50,000,000** *OR* **30% turnover** *OR* **3x benefit** (whichever is highest) | Serious privacy breach (e.g., failing to secure data) |
| **Company (Operational)** | Court-enforceable undertakings; compliance audits; data destruction orders; business suspension | Systemic failures; failing to honour opt-outs; serious breaches of Australian Privacy Policy |
| **Individual (Director/Officer)** | **$2,500,000** | Serious privacy interference; failing to manage cyber risk |
| **Individual (Staff)** | **$66,000** per breach | Administrative failures (e.g., non-compliant privacy policy) |
| **Civil Liability** | **Unlimited damages** | Direct right of action; statutory tort claims |

# LEARNING OUTCOMES & ACKNOWLEDGEMENT

By the end of this training, I confirm the following:

1. **Privacy Policy:** I know where to find the Privacy Policy on our website.
2. **Reporting Issues:** I understand the Privacy Escalation Process and will report any privacy risk or customer concern to my manager immediately.
3. **Reissuing Documents:** Before releasing any document to a customer, I must verify their identity by confirming their full name and ensuring their email or phone number exactly matches what is on file, or escalate if required.
4. **Getting Help:** I know where to go for privacy questions by visiting the Privacy Hub: **www.suttons.com.au/privacy-hub**
5. **Handling Customer Data:** I understand the rules for storing and accessing customer data:
   - I will **only** use Suttons-authorised platforms (such as Outlook, DealerSocket) with my company login.
   - I will **never** save company data to personal devices, camera rolls, contacts, or local storage.
6. **De-Identify Customer Data:** For every acquired vehicle, reasonable steps must be taken to destroy or de-identify any personal information so it cannot be accessed by the next owner. (including logbooks, service invoices, warranty documents, on-board systems such as satellite navigation, Bluetooth pairing, and stored phone contacts).
7. **My Obligation:** I am committed to protecting Suttons customer data, and will report any potential data breaches immediately.
8. **Doing the Right Thing:** I agree to carry out all business activities in line with the Suttons Privacy Policy.

## *Attendees*

| Staff Member Name | Signature |
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***REMEMBER:*** *When in doubt, stop, verify, and ask for help.*
*Let's protect our customers and our dealership by getting this right every time.*

Manager Name: _____ Signature: _____ Date: _____

☐ I have completed this privacy training with the team members listed above, who have satisfied all learning outcomes.

Location: _____ Department(s): _____