



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.

4. REISSUING DOCUMENTATION - SERVICE INVOICES

*To support vehicle history transparency for subsequent owners, service invoices may be released upon request. However, prior to release, the documentation must undergo a **de-identification** process to remove personal identifiers. When a request for service history is received from a subsequent vehicle owner, the following steps must be taken:*

Verification of Ownership:

- Verify that the requester is the **current registered owner** of the vehicle (e.g., by matching the name on the request with the title or registration).
- Confirm the specific **Vehicle Identification Number (VIN)** of the vehicle in question.

De-identification of Personal Information:

All documentation must be reviewed and the following information must be **permanently redacted** (de-identified) before release

- **Names:** Full names of previous drivers, employees, or individuals.
- **Addresses:** Personal addresses of previous owners, drivers, staff.
- **Contact Information:** Phone numbers and email addresses.
- **Payment Details:** including specific payment methods linked to an individual.
- **Vehicle Registration Number:** If it appears on the invoice, as this can be linked back to an individual via public registers.

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

5. STORING AND ACCESSING CUSTOMER DATA

All customer data **must** be accessed and saved **exclusively through Suttons-authorized 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 the table below for more details.



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

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 Suttons privacy policy on the company 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 Sales Contracts:** 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.
4. **Reissuing Documents Service Invoices:** I understand the process for releasing a truck's service history. Before any external disclosure, I know that I must follow the steps to accurately de-identify the invoices to remove all personal information.
5. **Getting Help:** I know where to go for privacy questions by visiting www.suttons.com.au/privacy-hub
6. **Handling Customer Data:** I understand the rules for storing and accessing customer data:
 - o I will only use Suttons-authorized platforms (such as Outlook, DealerSocket) with my company login.
 - o I will never save company data to personal devices, camera rolls, contacts, or local storage.
7. **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).
8. **My Obligation:** I am committed to protecting Suttons customer data and will report any potential data breaches immediately.
9. **Doing the Right Thing:** I agree to carry out all business activities in line with the Suttons Privacy Policy

REMEMBER: *When in doubt, stop, verify, and ask for help.*

Let's protect our customers and our dealership by getting this right every time.

Attendees

Staff Member Name	Signature

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): _____