



Privacy Policy

This Privacy Policy is made on behalf of Carcoop Pty Ltd (ACN 634 044 321) (“CarCoop”). CarCoop operates the website www.carcoop.com.au and collects your information and communicates with you when you make an enquiry or application through the website, by email or telephone with CarCoop, and may enter into a vehicle lease agreement with you and provide communications and services to you (including from third parties) in relation to the leased vehicle, including without limitation in relation to registration, insurance, maintenance, servicing and tracking of the vehicle, responding to any of your queries, as well as making offers and arrangements for you to return, upgrade or buy the vehicle in CarCoop’s discretion (the “Service”). CarCoop (“us”, “we”, or “our”) is committed to protecting your privacy and complying with the Australian Privacy Principles (“APPs”) contained in the *Privacy Act 1988* (Cth) (“Privacy Act”).

Purpose

The purpose of this Privacy Policy is to set out how we collect, use, disclose and protect Personal Information in accordance with the Privacy Act and APPs, *Privacy Regulation 2013* (Cth) and applicable Office of the Australian Information Commissioner (“OAIC”) guidelines, when you use our Service. We will not use or share your information with anyone except as described in this Privacy Policy.

We are committed to ensuring the privacy of your information and recognise that you may be concerned about your privacy and the confidentiality and security of the information that CarCoop may hold about you.

The Privacy Policy is designed to inform you of:

- the kinds of Personal Information we collect and hold;
- how we collect and hold Personal Information;
- the purposes for which we collect, hold, use and disclose Personal Information;
- your rights as to how we use information about you, including how you can access and update certain information about you;
- our processes for storing and securing your Personal Information; and
- how you may contact or make a complaint about us (if you believe or are concerned that we have breached an APP) and how we will deal with such a complaint.



Personal Information

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. If the information related to you cannot be

identified as being related to you (such as if we have aggregated and anonymised your Personal Information), then your de-identified information is not Personal Information.

Personally identifiable information we may collect from you may include (without limitation) your:

- name;
- residential/postal address;
- email address;
- phone number;
- date of birth;
- bank account details;
- other information relating to the provision of identification and verification documentation; and
- location information from a mobile device (e.g., GPS locator fitted in a vehicle), because it can reveal user activity patterns and habits,

("Personal Information").

Collection

CarCoop only collects Personal Information by lawful and fair means, which is reasonably necessary for the provision of our Service, when you use our website and when you provide it to us in applying for, and entering into, a vehicle lease with us and through our communications and interactions with you in relation to the leased vehicle and our Service.

Information you provide directly

We generally ask for your Personal Information when you complete our account application forms (in which we will advise the purposes for which we collect such information). Some provision of Personal Information is optional. However, if you do not provide us with certain types of Personal Information, you may be unable to enjoy the full functionality of our Service.



Information we collect automatically

We may also collect information that your browser sends whenever you visit our Service (“Log Data”). This Log Data may include information (without limitation) such as your:

- computer’s Internet Protocol (“IP”) address;
- browser type;
- browser version;
- the pages of our Service that you visit;
- the time and date of your visit;
- the time spent on those pages; and
- other statistics.

Cookies

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer’s hard drive.

We may use “cookies” to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

We may send a session cookie to your computer when you log in to your User account. This type of cookie helps your user experience, for example, if you visit multiple pages on our website during the same session, a session cookie enables you to not have to enter your password on each page. Once you log out or close your browser, this cookie expires.

We may also use longer-lasting cookies for other purposes such as to display your content and account information. We encode our cookies so that only we can interpret the information stored in them. Users always have the option of disabling cookies via their browser preferences. If you disable cookies on your browser, please note that some parts of our Service may not function as effectively or may be considerably slower.

Unsolicited Personal Information

Where we receive Personal Information about an individual which is unsolicited by us and not required for the provision of our Service, we will destroy the information (provided to the extent it is lawful and reasonable for us to do so).



Notification of the Collection of Personal Information

When we obtain Personal Information about you, we ensure that you have our contact details and are aware of our collection and purposes for collecting such information. We do not disclose your information to third parties, unless they are related entities or services providers, in which case they are required to conform to our procedures (subject to certain third-party service providers which have their own privacy policies (see below)).

Use and Disclosure of Personal Information

Primary purpose

We may use your Personal Information for providing and improving our Service. By using our Service, you agree to the collection and use of information in accordance with this Privacy Policy. The purpose for which we collect Personal Information is to provide you with the best service experience practicable in relation to our Service and for our internal business purposes that form part of normal business practices.

GPS Locator and Tracking Information

The vehicle you lease from CarCoop may be fitted with a GPS locator and CarCoop may monitor and track the location of the vehicle whilst it is in your possession. This location data (which may constitute your Personal Information) will be collected for the purpose of asset recovery and vehicle service management (which are legitimate business interests of CarCoop in the vehicle lease relationship with you).

You acknowledge and agree that we may collect and share information collected using the GPS locator in the vehicle to conduct enquiries, monitoring and further investigations for CarCoop's legitimate business purposes.

Secondary purpose

In certain cases, CarCoop will use or disclose Personal Information for secondary purposes (in addition to the primary purpose). Personal Information obtained to provide our Service may be applied to a secondary purpose if the secondary purpose is related to the primary purpose of collection and it is reasonable to expect the Personal Information to be used or disclosed for such secondary purpose.

Secondary purposes may include (without limitation) any one or more of the purposes set out below:

- providing information to you about CarCoop offers, discounts and other service arrangements (including from CarCoop affiliates and related entities) (see further information below about any direct marketing we may undertake with you);
- providing information to you about third party service providers we have relationships with in connection with your vehicle lease and related arrangements;
- responding to any specific requests you may make of us;



- updating your personal files; and
- sharing the information with our:
 - agents, contractors or third-party service providers, to enable them to provide administrative and other support services to us and you. For example, this may include without limitation insurance providers, vehicle service providers and other service providers to the vehicle leased by you. Also, we may use third-party services such as Google Analytics that collect, monitor and analyse information we may collect from you through your use of our website in order to increase our Service's functionality. These third-party service providers have their own privacy policies addressing how they use such information (please refer to specific sections below regarding these third-party service providers); and/ or
 - affiliates, if the information is required to provide the product or service you have requested, or to provide you with an opportunity to participate in their products or services.

Sensitive Information / Anonymity and Pseudonymity

CarCoop does not, for the purposes of the Privacy Act, collect sensitive information.

Wherever lawful and practicable, individuals may deal anonymously with CarCoop, however, given the nature of our Service, it is unlikely that this will be a viable option.

CarCoop does not use official identifiers (e.g. tax file numbers) to identify individuals. We note that an individual's name or Australian Business Number is not an identifier for the purposes of the Privacy Act and hence may be used to identify individuals.

Cross Border Disclosure

CarCoop may disclose Personal Information to an offshore data processing team located in Manila that is contracted via a third party for the purpose of the Personal Information being securely stored and processed for the provision of the Service.

Behavioral Remarketing

CarCoop may use remarketing services to advertise on third-party websites to you after you have visited our Service. We, and our third-party vendors, may use cookies to inform, optimise and serve ads based on your past visits to our Service.



Google

Google AdWords Remarketing and Google Display Network is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Facebook and Instagram

Facebook and Instagram remarketing services are provided by Meta.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/about/ads/#568137493302217>

Facebook adheres the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

Service Providers

As above, we may employ third-party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Information strictly to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.



Communications

We may use your Personal Information obtained for the provision of our Service to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you.

We will only use your Personal Information for the secondary purpose of direct marketing where:

- CarCoop has collected your Personal Information;
- you would reasonably have expected CarCoop to use or disclose the information for the purpose of direct marketing;
- CarCoop provides a simple means through which you can request to not receive marketing communications; and
- you have not requested that such communications cease.

For example, your email address will not be added to a mailing list without your consent unless the mailing list is related to the purpose for which you provided your email address to us. However, if through using our Service you provide your email address to us so that we may communicate with you through email, we may also use your email address to advise you of offers, discounts, upgrades and changes to our Service. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Compliance with Laws

We may disclose Personal Information in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring or interfering (intentionally or unintentionally) with our rights or property, users or anyone else who could be harmed by such activities. We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

Business Transaction

If we sell or buy businesses or their assets, or engage in transfers, acquisitions, mergers, restructurings, changes of control and other similar transactions, customer or user information is generally one of the transferable business assets. Thus, your Personal Information may be subject to such a transfer. In the unlikely event of insolvency, personal information may be transferred to a trustee or debtor in possession and then to a subsequent purchaser.



Security

The security of your Personal Information is important to us. We take reasonable steps and precautions to keep Personal Information secure from loss, misuse, and interference, and from unauthorised access, modification or disclosure.

If you use the internet to communicate with us, you should be aware that there are inherent risks in transmitting information over the internet. CarCoop does not have control over information while in transit over the internet or held in a method of electronic storage and thus, we cannot guarantee its security.

Where information is no longer required to be held or retained by CarCoop for any purpose or legal obligation, we will take all reasonable steps to destroy or de-identify the Personal Information accordingly. Where it is not practicable/possible for CarCoop to destroy or de-identify the Personal Information, we will securely store the information and isolate it from any further use until it can be deleted.

We strive to use commercially acceptable means to protect your Personal Information.

Access to Personal Information

Where a person requests access to their Personal Information, our policy is to permit access (provided that it is lawful and not prohibited by law or a court/tribunal order). We will not charge you a fee for your access request.

If a person wishes to access their Personal Information, they should contact CarCoop (see details below), and we will seek to provide such information within a reasonable period, and in the manner so requested (where reasonable to do so).

CarCoop may not always be able to give you access to all the Personal Information we hold about you. If this is the case, we will provide a written explanation of the reasons for our refusal, together with details of our complaints process for if you wish to challenge the decision.

Correction of Personal Information

CarCoop will correct Personal Information where:

- CarCoop believes Personal Information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading; or
- you request us to correct Personal Information held about you.

If a person wishes to correct their Personal Information, they should contact CarCoop (see details below). CarCoop will take all reasonable steps to correct such information in a reasonable time frame. No fees are payable for such requests. If you request us to similarly advise a relevant third party of such correction, we will facilitate that notification unless impracticable or unlawful for us to do so.



If we refuse to comply with your correction request, we will notify you in writing of our reasons for such refusal, and the complaints process you may access if you wish to challenge that decision.

Please note that the access and correction requirements under this Privacy Policy operates alongside and do not replace other informal or legal procedures by which an individual can be provided access to, or correction of, their personal information, including the requirements under the *Freedom of Information Act 1982* (Cth).

Complaints

If you wish to lodge a complaint with us relating to our compliance with privacy laws, our treatment of your Personal Information or any alleged breaches of privacy, please contact us at Finance@carcoop.com.au with the following information:

- your name and address;
- details of the complaint; and
- URL link to the alleged breach of privacy (if applicable).

Please allow us 30 days to investigate your complaint, after which we will contact you immediately to resolve the issue.

If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with the Office of the Australian Information Commissioner by telephoning +1300 363 992 or visiting their website at www.oaic.gov.au.

Retention of Information

We retain information for as long as required, allowed or subject to applicable law, which we believe is useful. We may dispose of information in our discretion without notice, subject to applicable law that specifically requires the handling or retention of information. You must keep your own, separate back-up records.

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.



Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from children under 18. If you are a parent or guardian and you are aware that your Children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children under 18 without verification of parental consent, we will take steps to remove that information from our servers or replace it with the Personal Information of the Child's parent or guardian.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our website.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on our website.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

Consent

You warrant that you are able to give consent under Australian Law or, in the event that you do not have the capacity to give consent, you warrant that your guardian or attorney is able to give any consent required under this Privacy Policy on your behalf.

By providing information to CarCoop in connection with the Service, you hereby expressly and voluntarily grant your informed consent to us to deal with your Personal Information in accordance with the disclosures, terms and conditions of this Privacy Policy (and as applicable, the terms and conditions of any written agreement you enter into with CarCoop). Should you retract your consent, please contact us. If you retract your consent, you acknowledge and agree that failure to provide certain types of Personal Information may not give you access to the full functionality of our Service.

Contact Us

If you have any questions relating to this Privacy Policy or your privacy rights, please contact us at:

Finance@carcoop.com.au.