



Smith Motor Company Pty Ltd and its related entities (Smith Motor Group “SMG”) recognise the importance of protecting an individual's privacy. We appreciate that individuals are concerned about the security of their personal information and we are committed to protecting any personal and sensitive information we hold.

Personal information is information or an opinion about an individual who is reasonably identifiable. The definitions of personal and sensitive information is set out in the Appendix to this policy.

In accordance with the 13 Australian Privacy Principles (APPs) set out in the Privacy Act 1988 (Cth) (Privacy Act), this Privacy Policy details how SMG will manage and protect personal information, including information that SMG collects and uses for the purpose of providing client and customer services.

Businesses within SMG are independent businesses however their privacy policies reflect the same intentions as those stated herein, differing in details to reflect the particular manufacturers, suppliers and or clientele that they deal with.

SMG may amend this Privacy Policy at any time, subject to law. The updated version will be available by following the "Privacy Policy" link on SMG's website homepage at www.onesmg.au. SMG may highlight changes to this Privacy Policy on its homepage, but you should check the Privacy Policy regularly for changes.

Open and transparent management of your personal information and/or sensitive information - APP1

SMG collects your personal information and/or sensitive information to provide you with the services that you have requested and also to provide you with information about products and services in which you may be interested. SMG may collect your personal information and/or sensitive information to comply with legal and regulatory requirements.

If the personal information and/or sensitive information requested by SMG is not provided by you we may not be able to provide you with our services.

SMG collects your personal information and/or sensitive information and stores that information electronically via local network services, online cloud storage and third party partners which are secure and cannot be accessed by unauthorised persons. SMG regularly changes passwords regarding access to information technology services and takes steps to ensure the information technology services are free from virus or unauthorised access.

We may also store paper copies of your personal information and/or sensitive information at our offices which are located at 111 Gawler Place, Adelaide, South Australia or at each related entity.

We believe our method of storing information is secure. The information we collect from you may be information that enables us to identify you. For example, the personal information and/or sensitive information could be your name, email address, phone number, bank details,

taxation information, accounting, financial information or any other information necessary to be able to provide you with legal advice.

As a client or customer of SMG we will provide your personal information and/or sensitive information to the following entities, organisations or people for the following reasons:

- Your representatives or service providers such as your Financial Institution/s, accountant, former or current solicitors or tax agents;
- Government authorities and other organisations when required by law; and Organisations and individuals that you have consented to your personal information and/or sensitive information being disclosed to.

Our privacy policy is provided to you free of charge and can be printed from this website.

If you consider that we have not appropriately stored or collected your personal information and/or sensitive information then you may make a complaint to our Privacy Officer by email or telephone at any time during business hours. Our Privacy Officer can be contacted by email at privacy@onesmg.au or by telephone on 08 8240 8700. Alternatively you may make a complaint to the Office of the Australian Information Commissioner via this link <http://www.oaic.gov.au/privacy/privacy-complaints> however we do request that you first provide us with an opportunity to address any concerns that you may have.

Anonymity and pseudonymity – APP2

It is not practical and in most circumstances, it will not be lawful for us to deal with individuals who have not identified themselves or used a pseudonym. Accordingly, to do business with us you must provide us with your personal information and/or sensitive information.

Collection of solicited personal information and/or sensitive information – APP3

All personal information and/or sensitive information that we collect from you is collected because it is reasonably necessary for, or directly related to, one or more of our functions or activities. In most circumstances it is necessary for us to collect personal information and/or sensitive information from you in order to comply with the law. If you do not consent to the collection of your personal information and/or sensitive information in accordance with this policy then you must notify our Privacy Officer immediately. It is most unlikely that we will be able to do business with you if you withdraw consent to collect your personal and/sensitive information.

SMG may collect and hold personal information about you such as your name, address, telephone number, driver's license, date of birth, your vehicle / RV's (vehicle), vehicle identification number, registration date, registration number, change of address and telephone information and any other information you may voluntarily provide to us.

SMG collects most personal information directly from you, for example when you provide information through enquiry or purchase or repair of a vehicle / RV, caravan/mobile home, service, parts or when you request that we assist in the facilitation of finance for the payment of any of our products or services. We may also gather information from market surveys, product focus groups, the websites operated by SMG, SMG's customer assistance service, via mail, email and telephone enquiries, and during the recruitment process. Third parties may also share information with us, including our suppliers and or the vehicle manufacturers (such as vehicle / RV purchasing, servicing, repair and warranty information). We may also gather

information by you entering a competition or promotion we run (either directly or through our marketing agents), or through a recruitment or employment agency.

The vehicles sold throughout the SMG may have a number of sophisticated computer systems that monitor and control several aspects of the vehicle's performance. Many motor vehicles use on-board vehicle computers to monitor emission control components to optimize fuel economy, to monitor conditions for air bag deployment and, if so equipped, to provide anti-lock braking and to help the driver control the vehicle in difficult driving situations. Some information may be stored during regular operations to facilitate repair of undetected malfunctions; other information is stored only in certain collision events by computer systems, such as those commonly called event data recorders (EDR). The information from EDR's, if available, is used to improve customer and driver safety, better understand what happens to manufacturers vehicles in the event of a collision and shall be provided to the police on request.

Dealing with unsolicited personal information and/or sensitive information – APP4

If we receive information from you that is not solicited then we will within a reasonable period after receiving the information, determine whether or not the entity could have collected the information under APP3 if we had in fact solicited it from you.

If we determine that we could not have collected the personal information and/or sensitive information from you and the information is not contained in a Commonwealth record, then we will as soon as practicable ensure that the information is de-identified or deleted.

Notification of the collection of personal information and/or sensitive information - APP5

By providing you with access to this policy we are notifying you that we may collect personal information and/or sensitive information about you and the reasons as to why we collect that information.

Use or disclosure of personal information and/or sensitive information – APP6

SMG only collects, holds and handles information about you that is necessary for us to perform the services you request from us, that is otherwise reasonably necessary for our business activities or if required by an Australian law or court or tribunal order.

We may use personal information we collect about you for a number of purposes including:

- to facilitate the delivery of goods and services which you have enquired about or have purchased from us.
- tell you about other products and services that may be of interest to you;
- to learn more about your level of satisfaction, your expectations of us and how we can meet them (for example, in relation to SMG products and services, and the products and services provided by our suppliers such as Roadside Assistance);
- to ensure that any warranty claim is properly administered;
- to run a competition or promotion you have entered;
- to consider you for a position within SMG for which you have applied;
- to acquire goods or services from you or from your employer;

- to ensure that you are contacted as soon as possible in the event of a safety-related product recall;
- for other purposes to which you have consented; and
- as required or permitted by relevant laws and regulations.

Generally, we may use your personal information for the purposes for which we collected it and for related purposes which would be reasonably expected by you.

If you do not provide your personal information, SMG is less able to perform the above functions and in some cases cannot services to you provide it at all.

Direct Marketing – APP7

Other than providing you with updates about our service, we will not use your personal information and/or sensitive information for the purposes of direct marketing unless we have collected your information; and we consider that you would reasonably expect us to use or disclose the information for that purpose. If you do not wish to receive direct marketing information from us you may unsubscribe by following the link provided in or correspondence with you or by contacting our Privacy Officer.

If you request that we do not use your information for direct marketing then we will not do so.

If you do not wish to receive marketing materials from SMG, its Businesses or its affiliates, please complete the opt-out provision on the marketing information sent to you and return it to SMG (or contact us at customercare@onesmg.au). SMG will note your request and respect your wish not to receive any marketing materials.

If you choose not to receive any marketing materials from SMG, you may miss out on special product and service offerings and opportunities.

Cookies

We use cookies and track IP addresses via our websites so we can improve our services provided by our websites and enhance your user experience.

Cookies are pieces of information a website can send to your computer's browser for record-keeping purposes. We use cookies to ascertain which web pages are visited and how often, to make our websites more user friendly, to give you a better experience when you return to a website and to target advertising to you that we think you may be interested in. For example, cookies allow us to save your password so you do not have to reenter it every time you visit our site. Most web browsers automatically accept cookies. Cookies can be disabled or purged from your browser if you so choose. You can find information specific to your browser under the "help" menu. We can't guarantee the proper functioning of our websites if you choose to disable cookies.

Cross-border disclosure of personal information and/or sensitive information – APP8

SMG may need to disclose personal information outside of the jurisdiction from which it was collected. When we disclose your personal information overseas, SMG is generally required to take reasonable measures to ensure that your information is held, managed and accessed in accordance with the standards that apply in Australia. In relation to health information about an individual, we will generally only disclose the information outside of the state or territory where

we collected it if we reasonably believe that the recipient of the information is subject to a law, binding scheme or contract which upholds principles for fair handling of the information that are substantially similar to the principles that apply in the state or territory of collection.

We may disclose personal information we collect about you for different purposes including:

- to assist our suppliers in providing the services including warranty for the products and services that we have supplied;
- to other service providers (such as information technology providers, mailing houses, Roadside Assistance) so that they can provide the services that we have contracted out to them; or to provide information to our Businesses so that they can provide goods or services to you or respond to a complaint by you, or to help them improve the quality and standard of service they provide to you;
- to your nominated referees so that we may check your references if you are applying for a position with SMG; and;
- as required by relevant laws and regulations.

SMG may disclose personal information to such entities located in the following countries/regions:

- the USA;
- Germany;
- Spain;
- other countries in Europe;
- Oceania;
- Brazil;
- South America; and/or
- Asia

We will not sell, rent or trade your information to/with any other organisation.

Adoption, use or disclosure of government related identifiers – APP9

Government related identifiers are not used unless required or authorised:

- under another Australian law other than the consumer data rules (CDR Rules) or a court/tribunal order, or
- as prescribed by regulations made under the Privacy Act 1988.

Quality of personal information and/or sensitive information – APP10

We will take all reasonable steps to ensure that the personal information and/or sensitive information that we collect from you is accurate, up-to-date and complete.

Security of personal information and/or sensitive information – APP11

We will take all reasonable steps to protect your personal information and/or sensitive information from misuse, interference and loss; and unauthorised access, modification or disclosure.

If we hold personal information and/or sensitive information about you and we no longer need that information for any purpose for which it may be used or disclosed and the information is not contained in a Commonwealth record; and we are not required by law to retain the information, then we will take reasonable steps to destroy the information or to ensure that it is de-identified.

Access to personal information and/or sensitive information - APP12

You can gain access to your personal information and/or sensitive information held by us if the request to access to that information is not prohibited by law; or frivolous or vexatious; or poses a serious threat to the life, health or safety of any individual or to public health or safety; or if giving access to that information would have an unreasonable impact on the privacy of other individuals; or if the information relates to existing or anticipated legal proceedings between us and you and would not be accessible by the process of discovery in those proceedings; or giving access would reveal our intentions in relation to negotiations with you in such a way that it would prejudice those negotiations.

Correction of personal information and/or sensitive information – APP13

If we hold personal information and/or sensitive information about you and we consider the information is inaccurate or you request that we correct the information, we will take all reasonable steps to correct that information having regard to the purpose for which it is held to ensure that the information is accurate, up-to-date, complete, relevant and not misleading.

If we refuse to update your personal information and/or sensitive information we will provide you with written notice as to why and the manner by which you can complain about the refusal.

If you wish to obtain access to and/or correct your personal information held by SMG, please contact SMG Customer Care at privacy@onesmg.au.

SMG will provide written acknowledgement of receiving your request for access within 7 days of receipt.

Unless it does not agree to your request for access to personal information, in most cases SMG will provide you with access within 30 days of receipt of your request. If you request corrections to your personal information and SMG agrees with your request, these changes will be made as soon as practicable. If SMG does not agree to your request for correction, it will notify you of the reasons it does not agree and will note your request on the records it holds about you. If you remain dissatisfied you may also complain to the Information Commissioner (at www.oaic.gov.au).

Appendix

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not.

Personal information may include:

- an individual's name, signature, address, phone number or date of birth
- sensitive information
- credit information
- employee record information
- photographs
- internet protocol (IP) addresses
- voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique)
- location information from a mobile device (because it can reveal user activity patterns and habits).

The Privacy Act 1988 doesn't cover the personal information of someone who has died.

Sensitive information means information or an opinion about an individual's:

- racial or ethnic origin; or
- political opinions or associations; or
- religious or philosophical beliefs; or
- trade union membership or associations; or
- sexual orientation or practices; or
- criminal record;
- health or genetic information;
- some aspects of biometric information;
- that is also personal information and/or sensitive information; or

Further questions

If you have any questions about this Privacy Policy or our privacy practices you can contact us at customercare@onesmg.au.