



Privacy Policy

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Stillwell Motor Group Privacy Policy

The Stillwell Motor Group is committed to respecting and protecting the privacy of individuals who deal with us. This document sets out our Privacy Policy and explains how Stillwell Motor Group manages personal information we may collect, and how you may gain access to or make complaints about the personal information we hold about you.

1. Australian Privacy Principles

Whenever we collect, hold, use, disclose, store, destroy or otherwise deal with any personal information, we are bound by and must comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and with the 13 Australian Privacy Principles (**APPs**) in the Privacy Act.

2. Kinds of personal information we collect and hold

“Personal information” includes any information or opinion about an identified, or reasonably identifiable, individual.

The kinds of personal information we collect about you will vary depending on the particular circumstances and the types of products and services you are interested in or that have been provided to you.

The kinds of personal information we may collect include:

- your name, residential and/or business address, email address, contact numbers, date of birth and driver's licence details;
- your employment history, education and qualifications;
- vehicle details such as details of any vehicle purchased, traded in or financed, purchase date registration details and the name of the particular dealership where you purchased the vehicle, to the extent such information identifies, or could reasonably identify, you;
- bank account and/or credit card payment details;
- vehicle warranty and service details, to the extent such information identifies, or could reasonably identify you;
- information about you that is collected from website link-throughs, marketing campaigns, product research, customer surveys and other enquiry related activities;
- any other personal information you provide to us; and
- any other personal information which we are required or authorised to collect under Australian law, for example for identity verification purposes or under a court/tribunal order.

When you browse our website or contact us electronically, we may also record your IP-address and domain, the name of the web pages you request, the website you are using to visit us, and

the date and time of your visit. This information does not identify you personally and is only used for our internal purposes.

We may also collect sensitive information about you, including health information, where necessary in the circumstances. We will not collect sensitive information about you unless you have consented or the collection is otherwise required or authorised by law.

3. Collection of personal information

Generally, we collect personal information directly from you through:

- vehicle sale and purchase contracts, vehicle or parts order forms, finance applications, vehicle service and maintenance requests and warranty requests that you submit to us;
- your activity on our website and social media platforms and the completion of online forms and surveys, contact with personnel, whether in person or by way of post, email, telephone, SMS or fax;
- your participation in our interactive membership, rewards and loyalty programs; and
- marketing campaigns we run including competitions, promotions, events, sponsorships or through our other partnerships.

There may be occasions when we collect personal information from other sources. These may include:

- The manufacturer of your vehicle and/or its affiliated finance companies;
- other dealers;
- the operators of vehicle advertising and sales websites;
- other companies including those which are part of the Stillwell Motor Group;
- service providers and business partners such as roadside assistance and accident management providers, fleet services providers and insurance providers; and
- publicly maintained records or other publicly available sources of information including social media and other similar websites.

Generally, we only collect personal information from sources other than you if it is unreasonable or impracticable to collect the personal information directly from you.

4. Purposes for collection of personal information

We collect, hold, use and disclose personal information in order to carry out our business functions and activities. For example, we collect, hold, use and disclose your personal information as necessary for:

- selling and trading in vehicles, parts, accessories and other related products and services (including finance & insurance);
- providing sales and aftersales activities including vehicle recalls, warranty, or servicing information;
- customer support, care and information and managing relationships with our customers;
- managing or administering the records for services we provide;
- managing or administering our loyalty and rewards programs;
- recruitment of employees, consultants and contractors;

- undertaking customer surveys and analysis;
- marketing activities, including providing you with information about our products, services or offers;
- related purposes which would be reasonably expected in the circumstances such as to provide your details to the vehicle manufacturer or their affiliates for registration, warranty or customer satisfaction surveys and /or other related marketing activities undertaken by them; or
- any purposes otherwise permitted or required by any Australian law or court/tribunal order.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

You may choose not to provide some or all of your personal information and you may choose to deal with us on an anonymous basis or under a pseudonym. However, without certain information and/or without being able to identify you, we may not be able to provide any or the full range of our products and/or services to you. In other circumstances, the use of your true identity may be a legal requirement. For example, by law your identity may need to be verified before you can receive certain products or services.

5. Disclosure of personal information

We may disclose your personal information on a confidential basis to:

- Other Dealers so that they may use the personal information for one or more of the purposes set out in paragraph 4 or to assist in carrying out the particular purpose;
- if applicable to other companies which are part of the Stillwell Motor Group;
- third parties engaged to perform administrative or other services;
- other service providers and business partners;
- vehicle registration and stamp duty authorities; and
- government agencies or bodies in respect of any suspicious or threshold transactions or activities.

Where we wish to disclose your personal information for other purposes, we will obtain your consent.

6. Overseas disclosures

In the course of doing business with you, we are likely to disclose personal information about you to overseas recipients, including vehicle manufacturers and original equipment manufacturers.

However, we will only do so when:

- it is necessary to complete the transaction you have initiated or entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

While it is not practicable to list every country in which such recipients may be located, recipients of such disclosures is likely to include England, Japan, Germany, France and Sweden.

7. Direct marketing

As detailed above, we may collect, use and disclose your personal information to inform you of our other products, services and special offers which may be of interest to you.

We may contact and communicate with you for the purpose of direct marketing via websites, social media and other similar websites, telephone, post, facsimile, email or SMS. This may occur through our own business or with the assistance of external marketing agencies and other contractors.

We will not directly market to you unless you are given an opportunity to opt out of receiving future direct marketing communications. Opt out procedures are included in all of our marketing communications.

8. Security of personal information

We will take steps reasonable in the circumstances to ensure that the personal information we hold is protected from misuse, interference, loss and unauthorised access, modification and disclosure.

Personal information (hard copy and electronic) is stored in secure databases on secure premises, accessible only by authorised staff. Personal information may also, in certain circumstances, be held on our behalf by service providers (such as secure offsite document storage providers or electronic data storage providers).

We require employees, service providers and other entities, to whom we disclose personal information, to ensure compliance with confidentiality and security requirements in accordance with the Privacy Act.

We will retain your personal information whilst it is required for any of our business functions or for any other lawful purpose. We take steps reasonable in the circumstances to destroy or de-identify any personal information held in where it is no longer required.

9. Access and correction - personal information

We take steps reasonable in the circumstances to ensure that the personal information collected, held, used and disclosed is accurate, complete, up-to-date, relevant and not misleading.

You have a right to access and seek correction of your personal information held by us.

Requests for access and correction can be made to the person you would normally deal with or via privacy@stillwellgroup.com.au

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the personal information as requested, we will give you written reasons why.

To obtain access to your personal information held by us, you will need to provide proof of your identity and be reasonably specific about the information you require. Access will be arranged at a convenient time for both parties.

We will endeavour to respond to a request for access or correction within 30 days from the request.

If you believe that information we hold is incorrect or not up to date please contact us at privacy@stillwellgroup.com.au

10. Complaints - personal information

We have procedures in place for dealing with complaints and concerns in relation to the Privacy Act and the APPs.

If you have a complaint about the way we hold or use your personal information, please contact us via privacy@stillwellgroup.com.au, stating your concern & how you would like your complaint resolved. We will confirm receipt of your complaint within 7 days and undertake to investigate your complaint within 30 days and respond with our findings and proposed action.

If you are dissatisfied with the outcome of the complaint, you may refer your complaint to the Office of the Australian Information Commissioner.

11. How to contact us

For further information or enquiries regarding our handling of personal information, or to opt-out of receiving any promotional communications, please contact on the following details:

Stillwell Motor Group

Address: 2 Hargrave Place, Moorabbin Airport, Mentone VIC 3194

Email: privacy@stillwellgroup.com.au

Phone: 03 9550 5300

12. Link to other websites

Our website may contain links to other third party websites, social media or other such digital platforms. We are not responsible for the Privacy policies or actions undertaken whilst on those sites or platforms.

13. Privacy Changes

We may at our discretion, issue privacy and collection statements or updates through this website or other points of contact and collection which will refer to this Privacy Policy.

This Privacy Policy was last updated on 1st August 2014