



**Smith
Motor
Group**

Smith Motor Company and business within the 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 information we hold.

Personal information is information or an opinion about an individual who is reasonably identifiable.

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 better customer service by striving to meet our customers' needs and expectations about our products, services and or other products.

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

Collecting personal information

SMG will be fair and open about the way we collect information about you and what we intend to do with the 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 of a vehicle, 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 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.

If we receive information about you from a third party, wherever practical we will make sure they undertake to comply with the Privacy Act.

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 detected 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.

Using personal information

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.

Disclosing personal information

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;
- 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;
- Africa;
- Oceania;
- Brazil;
- South America;
- Asia; and
- the Middle East;

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

Consent

We may require your consent to use and/or disclose your personal information if we need to use your information for a purpose that is not related to the purpose for which it was collected.

If you do not consent to SMG collecting, using and/or disclosing your personal information, this may affect our ability to deliver and improve our products and services.

Marketing and privacy

SMG sends marketing materials to its customers and other people who have provided SMG with personal information from time to time about products and services offered by SMG.

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@smithgroup.com.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 re-enter 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.

Protecting personal information

SMG will keep your personal information secure by taking reasonable steps to protect it from misuse, loss and unauthorised access, modification and disclosure.

SMG stores personal information in transmission logs and archive systems for a period SMG considers reasonable depending on the primary purpose for which that information was collected. Only properly authorised people who have a need to access personal information to perform their job will be able to see or use that information.

Personal information will be de-identified or destroyed when it is no longer required such that it cannot be re-identified at a later date.

SMG will ensure that its employees receive training (and refresher training) about the management of personal information relevant to their respective roles and responsibilities.

SMG will take reasonable steps to keep any personal information we hold about you secure. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory rights under any applicable law including the Privacy Act or the Competition and Consumer Act 2010 (Cth). Please notify us immediately if you become aware of any breach of security.

Accessing and requesting correction of personal information

We will strive to ensure that information about you is accurate when we collect or use it. Subject to some exceptions under the privacy legislation, we will let you see the information we hold about you and correct it if it is inaccurate, incomplete or out-of-date. If we do not grant you access to your personal information we will tell you why.

If you wish to obtain access to and/or correct your personal information held by SMG, please contact SMG Customer Care at customercare@smithgroup.com.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).

Resolving your concerns

If you have a complaint regarding SMG's management of your personal information, please prepare your complaint in writing and email it to us at customercare@smithgroup.com.au. SMG will provide written acknowledgement of your complaint within 7 days of receipt. We will investigate and advise you of the steps we have taken to resolve your complaint within 30 days of receipt of your complaint.

Privacy and SMG employees

Due to the "employee records exemption" in the Privacy Act, SMG is generally not required to comply with the Privacy Act in relation to personal information held in its employment records concerning current or former SMG employees. Therefore, this Privacy Policy generally does not apply in relation to current or former SMG employees.

However, SMG recognises that employee records should nevertheless be handled carefully, and SMG will comply with any obligations that may apply to employee personal information under other applicable laws.

SMG may disclose personal information held in its employment records for different purposes including: to our related companies and to service providers (such as information technology service providers, payroll service providers and service providers who assist SMG with onboarding new staff) so that they can provide the services that SMG has contracted to them to perform.

SMG employees may seek to access, update or correct the personal information which SMG holds about them by contacting the Smith Motor Group Human Resources Manager at hr@smithgroup.com.au. Such requests will be assessed on a case by case basis.

The employee records exemption does not apply (and this Privacy Policy does apply) to:

- independent contractors;
- secondees into SMG who remain employees of the seconding client or firm;
- voluntary work experience students; or
- job applicants.

This Privacy Policy also applies to health information collected by SMG about any individual, including SMG employees. For example, SMG may hold information about a disability that affects the activities an individual can perform in his/her employment, or about an individual who is injured on SMG premises.

Further questions

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