

The Lease Company Pty Ltd

Privacy Policy

General

Customer privacy is important to The Lease Company Pty Ltd. We are committed to providing our customers with quality services and products, and in doing so, we respect that personal information gathered in this process must be kept confidential. We maintain strict guidelines regarding access to and use of such information in compliance with the Australian Privacy Principles 2014.

The Lease Company Pty Ltd will use customer information in the manner described in this policy.

In 2001, a new Federal privacy regime came into effect, regulating the way private sector organizations deal with personal information. This framework is outlined in the Privacy Act 1988, associated amendments and the thirteen Australian Privacy Principles (as outlined in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012).

The Lease Company Pty Ltd recognizes the importance of personal information privacy and the requirements of this legislation with respect to the collection, storage and handling of such information.

This Policy outlines the information that we may collect, how we will collect it, how it will be used and your consent. If you have any questions regarding this Policy, please contact us directly.

The Information We Collect and Why

Wherever reasonable and practicable, we will only collect information about our customers *directly from* our customers.

However, we reserve the right to collect and submit information to third parties where necessary for us to comply with State and Commonwealth legislation as provided for by the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Typically, the information that we hold is in relation to:

- Customer contact details;
- Customer financial interests and where applicable, financial position; and
- The products and services we provide, or have provided, to you.

However, the nature of this information may change depending on the transaction between the customer and The Lease Company Pty Ltd.

We do not collect sensitive information about our clients (such as race, criminal convictions, health or political beliefs) unless required to do so by law.

We collect health information where we offer products with an insurance component to our customers. We do not use or share that information for any purpose other than the underwriting or administration of a customer's policy, claim or account, or as otherwise disclosed to the customer when the information is collected.

We also collect personal information from people who submit applications or register interest for employment with The Lease Company Pty Ltd.

The information collected regarding customers is held in secure and protected database systems on the premises of The Lease Company Pty Ltd, available only to staff with the required login details and passwords to access the system. Customers can also access this information (insofar as it pertains to them personally) via The Lease Company Pty Ltd website, using their own unique customer login details.

How We Collect the Information

Generally, we collect customer information directly from the customer, however in some cases information may be collected from third parties regarding the customer.

Examples of third-party data collection include (but are not limited to) credit reports where applicable, transaction data from fuel companies (in relation to fuel card use), client reports from toll-road providers and employment information as necessary (for example, in relation to novated leases).

The Lease Company Pty Ltd website requires that your web browser accepts cookies, which are used to make logging-in possible, but these cookies are not used to collect, store, and track or monitor any personal information. We also collect website statistics (which includes pages accessed and search terms used) but this information is not identifiable (i.e. we cannot tell who you are).

How We Use the Information

Primarily, we collect this information from our customers in order to:

- Provide quality products or services;
- Consider/assess applications made to us by customers and answer enquiries;
- Maintain customer contact details; and
- Fulfill our legal obligations under applicable laws and rules such as Anti-Money Laundering and Counter-Terrorism Financing legislation.

We may share your personal information, such as company name, address and vehicle registration numbers, with other companies we deal with, such as vehicle suppliers or fuel companies, to provide you with the services required. We keep this information to a minimum and do not provide this information to them to use for marketing purposes without consent.

The information collected by The Lease Company Pty Ltd, about our customers, may be used for the purposes of general marketing activity about our products

and services. If The Lease Company Pty Ltd provides customers with marketing material, the customer will be given the opportunity to communicate their desire to opt out of receiving future marketing material. When signing a quote, schedule or application, customers consent to the use of their information for the purpose of direct marketing by The Lease Company Pty Ltd.

We may also use or disclose customer information for related purposes such as:

- Helping us to develop and identify related products and services that may interest our customers;
- Inform customers about products or services;
- Maintaining customer relationships;
- Conducting internal market research or customer satisfaction reports;
- Performing internal administration and operations including accounting, risk management, record keeping, archiving, systems development and testing, credit scoring and staff training;
- Complying with legislative and regulatory requirements, including statutory and civil compliance (typically this relates to infringement and toll notices but can involve other compliance issues);
- Preventing and investigating crime or fraud to protect customer interests as well as the interests of The Lease Company Pty Ltd;
- Developing, establishing and administering alliances and other arrangements with other organizations in relation to the promotion, administration and use of our respective products and services; and
- Managing our rights and obligations in relation to external payment systems.

We only use and disclose personal information about customers for the purpose for which it was disclosed to us or related purposes which would reasonably be expected without customer permission.

The Lease Company Pty Ltd may contract out some of our functions and activities; for example, we may provide names and addresses to a mailing house to enable us to distribute information to you about your vehicle. In these

situations, we prohibit third parties from using your personal information except for the specific purpose for which we supply it.

We do not use your tax file number (TFN), Medicare number or any other government agency identifier as our customer identifier.

If at any time you provide The Lease Company Pty Ltd with the personal details of someone else (eg a spouse), you must ensure that the person has read and understood this privacy policy and separately consented to his or her personal information being used and disclosed to us by you for the purposes detailed in this policy.

The Lease Company Pty Ltd will not sell personal information to other organizations to allow them to market directly to our customers.

In the event that a customer defaults under any agreement with The Lease Company Pty Ltd, personal information may be provided to third party debt-collecting agencies and/or credit reporting agencies for the purpose of financial recovery and reimbursement, and in compliance with reporting regulations.

The Lease Company Pty Ltd will not provide personal information about customers to overseas recipients unless compelled to do so by law.

Laws and rules regarding the use of personal information may vary by jurisdiction. The Lease Company Pty Ltd complies with applicable laws and rules in the relevant jurisdiction.

Accessing Your Information and Complaints

Customers can access the information The Lease Company Pty Ltd holds about them simply by requesting to do so. Customers should contact The Lease Company Pty Ltd directly to make such requests, and The Lease Company Pty Ltd reserves the right to charge a fee in relation to the costs associated with recovering and allowing access to this information.

If the customer would like to update their personal information or make any corrections, they can do this simply by contacting The Lease Company Pty Ltd at their convenience.

If a customer has a complaint regarding the use of their information under this policy, they can lodge a written complaint with The Lease Company Pty Ltd by sending their complaint either by post to Level 1, 646 Whitehorse Road, Mitcham VIC 3155 or to info@myfleet.lease. The complaint will be managed by a Director personally, and a response will be given within 10 business days of receiving the complaint. If the customer is not satisfied with the response or the outcome, the complaint can be referred to our external dispute resolution provider, the Australian Financial Complaints Authority (AFCA).

Customer Consent

In the first instance, by asking The Lease Company Pty Ltd to assist with your leasing requirements and/or other advice, customers consent to the collection and use of personal information as provided for by this Policy. Additionally, when signing a quote, schedule or application for any of the products and/or services provided by The Lease Company Pty Ltd, customers give their consent to these activities.

Personal information is usually used or disclosed only after obtaining customer consent. Consent can be:

- Express; or
- Implied.

Express consent can be either:

- Verbal; and/or
- Written.

For example: when you sign a quote for a novated lease you are giving your *express* consent for us to obtain a credit reference about you from a credit-reporting agency.

You *imply* consent when we can reasonably conclude that you have given consent by conduct, or in the alternative, by a lack of conduct. For example, if you use a telephone service and *continue* the call after hearing the recorded message telling you that the call may be monitored or recorded for training purposes, you have given your implied consent to monitor or record your call.

If customers do not consent to certain uses of personal information, The Lease Company Pty Ltd may not be able to deal with that customer or provide them with a particular product or service. Similarly, if a customer chooses to remain anonymous or use a pseudonym it may be impracticable for The Lease Company Pty Ltd to deal with that customer effectively.

Information Security

The Lease Company Pty Ltd takes reasonable steps to protect customer information from misuse and loss resulting from unauthorized access, modification or disclosure. This involves:

- Non-Disclosure: we do not disclose your personal information to other people or corporations in circumstances other than those described in this Privacy Policy;
- Physical Security: we do not allow unauthorized entry to our premises or information sources and storage areas;
- Computer System Security: we secure our computer systems to prevent unauthorized access and modification to our files, databases and networks; and
- Destruction: where information is no longer needed it is safely destroyed or de-identified.

Compliance with Anti-Spam Legislation

The Lease Company Pty Ltd understands the inconvenience spam (unsolicited

commercial electronic messages) can cause to a business, so we make sure we comply with the requirements of the Spam Act 2003.

Messages are only sent to an address when an individual has consented to receive it. Such consent is implied through the provision of the email address in question.

All communications via email are relevant and important. Where the communications are of a general marketing nature, the customer will be provided with an option to remove themselves from future communications of this nature.

Our messages are clearly identified as being sent from The Lease Company Pty Ltd (or Myfleet as the trading name) and include our contact information and an easy, functional way of unsubscribing.