

Privacy Policy for OPEN ROAD AUTO GROUP PTY LTD ABN 22 665 816 231

1. Purpose

- 1.1. Open Road Auto Group recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information.
- 1.2. We respect your rights to privacy under the Australian Privacy Act 1988 (Cth) and the New Zealand Privacy Act 2020 (Privacy Laws). We comply with all Privacy Laws in respect of the collection, management and disclosure of your personal information.
- 1.3. Open Road Auto Group needs to collect personal information from you to rent a vehicle or provide our other services. We collect personal information when you give it to us, such as by telephone, fax, postal mail, email, at the counter, upon completion of an application form or through your use of the Open Road Auto Groups website or mobile App or the use of our products and services.
- 1.4 This Privacy Policy applies only to handling of personal information by Open Road Auto Group.
- 1.5 This policy provides information to customers as to how their personal information is collected and used within Open Road Auto Group, and the circumstances in which we may disclose it to third parties.

2. Procedure

- 2.1. Open Road Auto Group will:
 - a. Provide a copy of this Policy upon request;
 - b. Ensure staff comply with this policy and deal appropriately with inquiries or concern;
 - c. Take such steps as are reasonable in the circumstances to implement practices, procedures and systems to ensure compliance with this Policy and deal with inquiries or complaints; and
 - d. Collect personal information for the primary purpose of managing a customers rental request and provision of those services.

3. Personal Information

Personal information within this Policy means, any opinion or information that can be used to personally identify you. This may include your name, address, telephone number, email address, financial information and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

When you make a reservation, rent a vehicle or join one of our programs such as a corporate program or our preferred renter program, we collect information to provide you with our great services (for example, renting a vehicle, including performing the vehicle rental contract as set out in our General Conditions of Rental, Location Specific Conditions and Rental Agreement, providing any requested optional extras, taking payment, pre-authorisations and security deposits and providing discounts and offers or other benefits) and for our legitimate business interests (for example, research and development of new products and services, undertaking fraud and security checks and enforcing our legal rights).

- 3.1. If you are a Client or potential Client of our network we may collect the following types of personal information about you:
 - a. Name;
 - b. Mailing or street addresses;
 - c. Age or birth date;
 - d. Email address;
 - e. Telephone number;
 - f. Identification information including drivers licence, passport or other photographic identification;
 - g. Username, password and any personal information that we obtain when you use our website, App, Social media or other platforms including details of your preferences in receiving marketing information and your communication preferences;
 - h. Bank account and/or credit card details and other payment method details;
 - i. Details of the services you have acquired from us or which you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
 - j. Information about how you use our services;
 - k. Photographic and video content of you in connection with your use of our services;

- l. Sensitive personal information if it is relevant to the services that we provide such as injuries, illnesses, whether you are pregnant and any other relevant health information;
- m. Technical information related to your internet protocol (IP) address used to connect to our website, App or other platforms, information about your visit to our website, App or other platforms, location information that we may collect through our website, App or other platforms and any other personal information from a third party application or application; and
- n. In some Australian States and Territories, we may be required by applicable laws, regulations or codes of conduct to verify your identity before we can provide our services to you. This may involve conducting a 100-point identity check, sighting a form of photographic identity such as drivers license number or passport number.
- o. Special requests and preferences, including:
 - a. your preferences regarding optional extras such as damage waivers and other protections;
 - b. where a delivery or collection service is available, the address where we will drop off or pick up the vehicle and any optional extras you requested; and
- p. Other information that may be required to rent you a vehicle and/or provide you with services.

3.2. Please be aware that, in certain circumstances, where you do not provide personal information, which is required by us, we will not be able to provide the products and services under our contract with you or may not be able to comply with a legal obligation on us. For example when renting a vehicle with us we will require information such as your name, address, payment information and driver's licence. If you fail to provide this information we will be unable to rent a vehicle to you. You will be made aware if this situation arises.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website, App or other platforms.

3.3 Personal information of others, the case that you are making a booking on behalf of yourself and someone else or on behalf of someone else. In both scenarios, we will collect the information of all parties as part of the booking.

In the case where you use Open Road Auto Group to share information with others. This includes partaking in the referral program as described when you use the relevant feature. If you do this, it is your responsibility to inform the other parties that by referring our services to them, you may have shared their personal information, and it is your responsibility to ensure that they have understood and accepted how Open Road Auto Group uses their information (as described in this Privacy Policy).

4. What we do with the Personal Information

- 4.1. Open Road Auto Group will only use and disclose your personal information so we can provide you with the services you have requested as well as for the following directly related secondary purposes:
- a. Managing your account with Open Road Auto Group;
 - b. Provide you with our services and products;
 - c. To improve our products and services;
 - d. Send promotional emails and short message services to you about new products, special offers or other information which we think you may find interesting using the email address or mobile number that you have provided;
 - e. Contact you for market research purposes; and
 - f. To customise the Open Road Auto Group website according to your interests. We may provide your information to our third party partners for marketing promotional purposes provided we first have your consent.
- 4.2. Open Road Auto Group will never sell your information.

5. Links

5.1. The Open Road Auto Group emails, website and social media may contain links to other websites of interest. However, once you used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

6. Vehicle Data

6.1. Some vehicles you rent from Open Road Auto Group have been manufactured or equipped with on-board devices so as to be connected to the internet (connected car) which allows us to send commands and receive certain information from the vehicle, including geolocation data from a global positioning system (GPS). This data will be collected, and stored by Open Road Auto Group.

7. Photos and Video

7.1. Open Road Auto Group rental locations may be equipped with video security surveillance systems as well as cameras that may record as our vehicles depart/enter our lots and these cameras may take images or photos of you, authorized drivers, and passengers. We may take an image or photo of you and scan your drivers' licence, passport or other identity documents to confirm information you provided Open Road Auto Group.

8. Coverage Products

8.1. In the event that you make a claim under a product, your personal information relating to the claim will be provided to the insurer and any appointed claims handler. We do this to fulfil the terms of our agreement with you and to establish, exercise or defend any associated legal claims.

8.2. The use of your personal information by that insurer will be subject to the terms of that insurers privacy policy.

9. Renting a Vehicle

9.1. If you have an accident or suffer any loss theft or damage to the vehicle or suffer mechanical failure while renting one of our vehicles, we will collect information regarding such incident including your report of the incident and any police or other third party report including details of those involved, together with the nature of any personal injuries and/or damage to the vehicle and optional extras. We will use this information to perform our contract with you, for our legitimate business interests, for complying with any legal obligations on us and establishing, exercising, or defending legal claims arising as a result of such incident.

9.2. During your rental term we collect where and when you rented the vehicle, where and when you returned the vehicle, coverage preferences, fuel consumption, mileage, accident history and other information related to the vehicle and your use of it. This information is required to provide you with the services you requested under the rental contract or for our legitimate business interests (for example to monitor the usage of our vehicle fleet).

9.3. We will also collect any information about any speeding, parking, toll, or other traffic-related fines that you incur or any traffic offenses that you commit during your rental term where these are provided to us by any law enforcement agency.

9.4. Where you inform us that you have a medical disability that requires an adapted vehicle or other driver's aid, we will use this information in order to provide you with the services requested and where you have given your explicit consent to us using that information.

9.5. When you call us, we may record or monitor the call for quality control, training, or similar purposes.

9.6. We will only use this information for the specific reason for which it is provided. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact customer services on our website.