



# **Cars on Demand Privacy Policy**

Updated April 2015

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**Cars on Demand Pty Limited** (Cars on Demand) recognises the importance of protecting the privacy of our customers and other third parties who provide their personal information to us. At the forefront of our approach to service is confidentiality of in-car discussions between you and our drivers or you and third parties.

Our policy for dealing with your personal information is below (our Privacy Policy). Our Privacy Policy was last updated on 16 September 2014 and includes disclosure of the matters set out in the Australian Privacy Principles.

## Personal information we collect

When used in this policy, “personal information” has the meaning given to that term in the Privacy Act 1988 (Cth). Personal information generally includes any information that can be used to personally identify a person.

We may collect the following types of personal information relating to our customers and third parties in the course of our business:

- names;
- residential or business addresses;
- genders;
- email addresses;
- post codes;
- ages and dates of birth;
- signatures;
- telephone numbers;
- proofs of identity, such as driver licences or passport numbers; or
- if you are a candidate for employment, whether by way of contract of service or contract for services, we may collect other information during the recruitment process. This collection of information will be notified to you at the time but may include information relating to your employment history, working eligibility rights, suitability for the role you are applying for, and your referee details.

## Other information

We may also collect information from you and third parties that is not personal information because it does not identify you or the third parties personally. This information is normally retained together, with your personal information, and may include:

- your transaction history with us, including a list of services you have purchased from Cars on Demand (this may include details of your previous trips including routes and destinations, car type, respective driver details, dates of transactions or other attributes of products and services we have provided to you or may provide to you in the future);
- your marketing preferences, including the type of marketing materials you wish to receive and the method of delivery (email, SMS, direct mail, or other);
- information we require to honour any service commitments to you;
- information you provide to us via our telephone centre, website, mobile phone application, or directly to our employees, agents and contractors in relation to our services; and

- device identification information when you use a computer, mobile phone, smart phone, tablet, or other device to access website (www.carsondemand.com.au) - this information may include session cookies, your device IMEI number, IP address or MAC address.

## Cookies

We may use temporary (session) cookies or permanent cookies when you access our website. This allows us to recognise your browser and track the web pages you have visited. You can switch off cookies by adjusting the settings on your web browser. You should talk to your IT specialist if you need assistance in this regard.

## Unsolicited information

If you send us personal information that we have not requested, or we determine that the personal information you have provided to us is not reasonably necessary or directly related to any of our functions or activities, we may de-identify or delete this information without notifying you. This will be done to protect your privacy.

## How we collect your personal information

Normally, we collect information from you directly, unless it is unreasonable or impracticable to do so.

Collection of your personal information can occur through the following interactions:

- when you access and use our website or mobile phone application;
- during conversations with our employees (but not our drivers unless you wish such information to be collected);
- when you complete purchase orders, registrations, requests or applications for our services (by phone, in person or electronically);
- when you communicate with us directly (by email, telephone, direct mail or any other means other than through our drivers);
- when you interact with us during promotions, competitions, special events, or by using devices within our cars; or
- if you are a candidate for employment, when you complete forms in relation to the recruitment and selection process, for the purpose of assessment or when we contact referees for information about your skills and experience.

## How we hold your personal information

We may hold your personal information in either electronic or hard copy form.

If you provide information to us electronically we retain this information in our computer systems and databases. This includes computer software programs, internet servers, and hosted internet solutions provided by third parties.

If you provide information to us in hard copy (paper) this information is normally retained in our files and a copy is made to our electronic files.

## Security

We use industry standard security measures to safeguard and protect your information. This includes taking reasonable steps to ensure your personal information is protected from misuse, loss, unauthorised access, modification or disclosure.

If we are unable to collect your personal information

If we are unable to collect your personal information, some or all of the following may occur:

- we may be unable to provide services to you;
- we may be unable to communicate with you to provide information about services that you have purchased from us, or may intend to purchase in the future;
- we may be unable to tailor our marketing communications to suit your preferences;
- your experience when interacting with us may be delayed or not as efficient as you may expect; or
- if you are a candidate for employment, we may not be able to process your application for a contract of service or for services with us.

## Purpose

We collect your personal information so that we can carry out the following actions

(Purpose):

- provide you with services that you have requested from us;
- answer your questions and provide you with information or advice;
- create orders, transaction records, agreements for the sale of services, accounts, tax invoices or receipts;
- provide your personal information to third parties that assist us in providing services you have requested;
- carry out administration, marketing, planning, procurement, service development, quality control and research to improve the way Cars on Demand provides products and services to you;
- consider and respond to complaints made by you;
- communicate with you, including about services, competitions and results, special offers, and events which might interest you;
- comply with laws or regulations or to comply with any directions given by regulators or authorities; or
- if you are a candidate for employment, to assess your suitability for a position at Cars on Demand.

## Disclosure

Your personal information may be disclosed in connection with any Purpose to any of the following:

- Our employees, contractors or service providers, to the extent reasonably necessary to fulfil our obligations to you. This may include internet service providers, IT systems administrators, couriers, payment processors, and data entry service providers.
- Our business advisors, including lawyers, accountants or other professional service providers, to the extent reasonably required.
- Third parties with whom we have commercial relationships, for business, marketing and related purposes.

- If you are a candidate for an employment position involving a third party with whom we have an agreement, to that third party to assess your application.
- If required by law, to any person authorised by such law. This may include the police service, ambulance service, or government departments or regulators within Australia in connection with law enforcement activities.
- Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## Direct Marketing

We may send you direct marketing communications and information about products and services offered by us or our retail brands, partners or suppliers via email, SMS, or regular mail.

If you have indicated a preference for a method of communication, we will use reasonable efforts to use that method wherever practical to do so.

You may opt out of receiving marketing communications at any time by responding via the channel in which you received the marketing communication, or by contacting us. You can unsubscribe from emails by clicking the unsubscribe link on the footer of the email communication you have received.

We do not provide your personal information to any other organisations for the purposes of direct marketing.

## Access

You may access your personal information held by Cars on Demand by making a request to us

Email: [admin@carsondemand.com.au](mailto:admin@carsondemand.com.au)

Phone: 1300 638 258

You may also access your own information where it is held via an online portal by accessing your own account over the internet.

Normally we will provide a record of your personal information to you through your preferred contact method (phone, email or mail), and we will not charge a fee.

If your request is unlawful or may interfere with the privacy of others we may reasonably refuse to provide access to your personal information.

## Correction of Personal Information

You may update your personal information at any time by logging into your account and making the required changes. We may ask you to verify your identity to ensure that personal information we hold is not improperly accessed.

## Complaints

If you feel your privacy has been breached, please contact us using the contact information above setting out the circumstances and reasons for your complaint.

Our team members will acknowledge receipt of your complaint within 48 hours, and will normally respond to your request within 5 business days. If your complaint is complicated or requires further investigation our response may take additional time to finalise.

We will respond to you by your preferred contact method if you have indicated one.

## Overseas disclosure

We may disclose your personal information to third parties and service providers located overseas in connection with a Purpose.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

Subject to us taking reasonable steps to ensure that the overseas recipients of your personal information do not breach privacy obligations we may disclose your personal information to the following locations:

- third parties with information technology infrastructure in Australia and New Zealand;
- third parties with information technology infrastructure in the United States of America;
- third parties with information technology infrastructure in Europe; and
- third parties with information technology infrastructure anywhere else.

## Other services

We may offer seasonal or temporary services, promotions, products, competitions or other promotional events from time to time (Other Services). Our Privacy Policy will apply to those Other Services but we may have additional terms which apply. Any additional terms will be made available to you when you are utilising our Other Services.

## Contacting us

If you would like to contact us in relation to this Privacy Policy or your personal information please contact us at:

Email: [admin@carsondemand.com.au](mailto:admin@carsondemand.com.au)  
Phone: 1300 638 258

We may update our Privacy Policy from time to time. Amendments will be published on our web page [www.carsondemand.com.au](http://www.carsondemand.com.au)

### Schedule 3: The Australian Privacy Principles

- APP 1: open and transparent management of personal information
- APP 2: anonymity and pseudonymity
- APP 3: collection of solicited personal information
- APP 4: dealing with unsolicited personal information
- APP 5: notification of the collection of personal information
- APP 6: use or disclosure of personal information
- APP 7: direct marketing
- APP 8: cross border disclosure of personal information
- APP 9: adoption, use or disclosure of government related identifiers
- APP 10: quality of personal information
- APP 11: security of personal information
- APP 12: access to personal information
- APP 13: correction of personal information

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