

# PRIVACY POLICY

## JOWETT MOTOR GROUP

### 1. INTRODUCTION

At The Jowett Motor Group, the privacy of your personal information is important to us. This document sets out the Privacy Policy of The Jowett Motor Group and explains how we manage personal information.

Whenever The Jowett Motor Group collects, holds, uses, discloses or otherwise deals with any personal information, we are bound by and must comply with the *Privacy Act 1988* (**Privacy Act**), the Australian Privacy Principles (**APPs**) contained in the Privacy Act, and the *Spam Act 2003* (Cth).

In this Privacy Policy:

**we, us, our** or **The Jowett Motor Group** means Jowett Motor Group Pty Ltd ACN 069 648 433 and its related entities.

**website** means our websites, located at:

- <https://www.jmgpl.com.au/>
- <https://www.southyarrabmw.com.au/>
- <https://www.berwickbmw.com.au/>
- <https://berwickminigarage.com.au/>
- <https://www.glenelgbmw.com.au/>
- <https://glenelgminigarage.com.au/>
- <https://www.waverleybmw.com.au/>
- <https://www.honda.com.au/honda-centre/brighton-honda-centre>
- <https://www.honda.com.au/honda-centre/eastern-honda>
- <https://www.honda.com.au/honda-centre/northern-honda>
- <https://www.cherydoncaster.com.au/>

**Personal information** means any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

### 2. THE TYPE OF PERSONAL INFORMATION WE COLLECT

The kinds of personal information which The Jowett Motor Group collects will vary depending on the particular circumstances and the types of products and services provided to you. Generally, the kinds of personal information we may collect includes, but is not limited to:

- contact and identification information such as your name, residential and/or business address, email address, contact numbers, date of birth and government related identifiers (including but not limited to driver's licence details and Medicare numbers);
- financial information including credit card details, bank account details and superannuation details;
- employment related information including, but not limited to, employment history, education and qualifications;

- vehicle details such as details of any vehicle purchased or financed, purchase date, to the extent such information identifies or could reasonably identify you;
- warranty and service details, to the extent such information identifies or could reasonably identify you;
- electronic data collected via cookies and Facebook pixels when you use our website, including your IP address, browser type, geographical tags, and statistical data;
- any other information you provide to The Jowett Motor Group; and
- any other personal information which The Jowett Motor Group is required or authorised to collect under Australian law, including but not limited to, verification of identity purposes or a court/tribunal order.

The Jowett Motor Group 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, The Jowett Motor Group collects personal information directly from you when you:

- interact with our websites and when you complete our online forms;
- contact The Jowett Motor Group's personnel or make enquiries with us whether in person or by way of email, telephone, SMS or fax communications or correspondence sent via post;
- engage with our social media platforms;
- interact with our marketing campaigns including competitions, promotions, events, sponsorships or through other partnerships; and
- when you provide personal information to our sale representatives and other staff and agents.

Whilst The Jowett Motor Group attempts to collect personal information directly from you, there may be occasions when The Jowett Motor Group collects personal information by indirect means, those sources include (but are not limited to):

- Publicly maintained records or other publicly available sources;;
- BMW Australia Ltd or BMW Australia Finance Ltd;
- other BMW dealerships;
- Honda Australia Pty Ltd;
- other Honda dealerships
- Chery Australia Pty Ltd;
- other Chery dealerships
- if applicable, other companies which are part of The Jowett Motor Group's corporate group; and
- service providers and business partners such as roadside assistance and accident management providers, fleet services provider and insurance providers.

The Jowett Motor Group only collects personal information from sources other than you if it is unreasonable or impracticable to collect the personal information from you directly. Where The Jowett Motor Group has collected personal information by indirect means, we will take reasonable steps to inform you that we have your personal information.

## 4. PURPOSES FOR WHICH THE JOWETT MOTOR GROUP COLLECT PERSONAL INFORMATION

The Jowett Motor Group collects, holds, uses and discloses personal information for the primary purpose for which it was collected and related purposes that are reasonably necessary for one or more of our functions and activities.

Generally, we use the personal information that we collect to enable us to conduct our business and to provide our products and services to you.

The main purposes for which The Jowett Motor Group collect, hold, use and disclose your personal information include (but are not limited to):

- sales and aftersales activities including the provision of warranty services;
- customer support, care and information and managing relationships with customers;
- managing or administering the services which The Jowett Motor Group provides;
- recruitment of employees, consultants and contractors;
- undertaking customer surveys and analysis;
- marketing activities, including promotions or newsletter communications about the products and services of The Jowett Motor Group;
- other purposes about which The Jowett Motor Group informs you when your personal information is collected or to which you have otherwise consented, including arranging for finance and providing registration of vehicle services with VicRoads;
- related purposes which would be reasonably expected in the circumstances; and/or
- any purposes otherwise permitted or required by any Australian law or court/tribunal order.

Where you have provided consent, The Jowett Motor Group may also collect and use personal information in order to keep you up to date with information about our products and services.

You may choose not to provide some or all of your personal information and you may choose to deal with The Jowett Motor Group 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 some products and/or services to you. For example, by law your identity may need to be verified before you can receive certain products or services.

## 5. DISCLOSURE OF PERSONAL INFORMATION

The Jowett Motor Group may disclose your personal information on a confidential basis to:

- other BMW dealerships so that they may use the personal information for one or more of the purposes set out in paragraph 4 or to assist The Jowett Motor Group to carry out the particular purpose;
- other Honda dealerships so that they may use the personal information for one or more of the purposes set out in paragraph 4 or to assist The Jowett Motor Group to carry out the particular purpose;
- other companies which are part of The Jowett Motor Group corporate group;
- third parties engaged to perform administrative or other services;
- other service providers and business partners;
- VicRoads or other government authorities for the purpose of vehicle registration;
- AUSTRAC or other government agencies or bodies in respect of any suspicious or threshold transactions or activities;

- law enforcement agencies; and
- Original Equipment Manufacturers (OEMs) such as BMW Australia Ltd or Honda Australia Pty Ltd.

We will also disclose personal information to third parties where we are compelled to do so by law, or have otherwise received your consent.

We may request your consent to disclose your personal information for a particular purpose. In other circumstances, you will be deemed to have given your consent, including where you indicate to us that you wish to obtain information from any of our affiliated third parties about the products and services that they provide.

## **6. DIRECT MARKETING**

As detailed above The Jowett Motor Group may collect, use and disclose your personal information to inform you of products, services or offers of The Jowett Motor Group and business partners which may be of interest to you.

The Jowett Motor Group may contact and communicate with you for the purpose of direct marketing via our websites, social media and other similar websites, the telephone, post, facsimile, email or SMS. If you do not want to receive this information in a particular way or at all or you do not want The Jowett Motor Group to use or disclose your personal information for direct marketing purposes, you may contact our Privacy Officer on the details set out in paragraph 8 .

The Jowett Motor Group will not directly market to you unless you have been given an opportunity to opt out of receiving future direct marketing communications. However, if The Jowett Motor Group contacts you for the purpose of direct marketing, without having obtained your prior consent, The Jowett Motor Group will explain that you can opt out and tell you how to opt out of receiving any further marketing communications.

## **7. SECURITY OF PERSONAL INFORMATION**

The Jowett Motor Group takes all reasonable steps to ensure that the personal information we collect and hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

The Jowett Motor Group holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible by authorised staff.

Personal information may also, in certain circumstances, be held on behalf of The Jowett Motor Group in hard copy or electronic forms by their service providers (such as offsite document storage providers or electronic data storage providers).

The Jowett Motor Group provides employees with regular and updated training to ensure that they are aware of, and comply with, their obligations in relation to the handling of personal information. We also work with our service providers and other entities to which we disclose personal information to ensure that they comply with confidentiality and security requirements regarding personal information held on our behalf and to treat personal information in accordance with the Privacy Act.

The Jowett Motor Group takes steps reasonable in the circumstances to destroy or permanently de-identify any personal information held in circumstances where it is no longer required, unless the retention of the personal information is otherwise required or authorised by law.

## **8. ACCESS AND CORRECTION -PERSONAL INFORMATION**

The Jowett Motor Group takes all reasonable steps to ensure that the personal information they collect, hold, use and disclose is accurate, complete and up to date.

You have a right to request access to and seek correction of your personal information held by The Jowett Motor Group. Requests for access and correction can be made to The Jowett Motor Group Privacy Officer on the contact details set out below:

By email to:           privacy@jmgpl.com.au

By phone:             03 9122 8923

By mail to:            Privacy Officer, Jowett Motor Group, 579 Springvale Road, Glen Waverley VIC 3150

To obtain access to your personal information held by The Jowett Motor Group, you will need to provide proof of your identity and be reasonably specific about the information you require. We may charge you a reasonable administration fee, which reflects the cost to The Jowett Motor Group for providing access in accordance with your request. Access will normally be given in the manner requested if it is possible or otherwise The Jowett Motor Group will take reasonable steps to give access in a way that meets your needs and the needs of The Jowett Motor Group.

The Jowett Motor Group may refuse access to personal information if a circumstance exists where we consider such access would be inappropriate, for example where access would infringe another individual's privacy. If The Jowett Motor Group does refuse a request for access or correction, written reasons for the refusal and details of complaint mechanisms will be provided.

The Jowett Motor Group will endeavour to respond to a request for access or correction within 30 days from the request.

## 9. COMPLAINTS -PERSONAL INFORMATION

If you believe that The Jowett Motor Group has not dealt with your personal information in a manner that complies with the Privacy Act and the APPs, you should contact The Jowett Motor Group Privacy Officer on the contact details set out in paragraph 8. Generally, you will be required to put your complaint in writing.

Privacy complaints will:

- be treated seriously;
- be dealt with promptly;
- be dealt with in a confidential manner; and
- not affect existing obligations or the commercial arrangements between you and The Jowett Motor Group.

The Jowett Motor Group's Privacy Officer will commence an investigation into your complaint and inform you of the outcome of the complaint following the completion of the investigation and within a reasonable time.

We will handle all complaints in accordance with our obligations under the APPs.

In the event you are dissatisfied with the outcome of the complaint, you may refer your complaint to the Office of the Australian Information Commissioner on 1300 363 992 or at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## 10. TRANSPARENCY

A copy of this Privacy Policy will be made available to anyone who requests it and a link to this Privacy Policy will be provided on our websites.

A request for a copy of this Privacy Policy may be made to The Jowett Motor Group's Privacy Officer on the details in paragraph 8 or by calling 03 9122 8923.

## 11. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be reviewed and amended from time to time. Any updated Privacy Policy will be made available on our website or otherwise on request.

## 12. PRIVACY POLICY AND COLLECTION STATEMENTS

The Jowett Motor Group may also issue privacy and collection statements through our website or other points of contact and collection, which will refer to this Privacy Policy but will also give more specific information about the collection, use and disclosure of personal information being collected at that time (by reference to the relevant circumstances of collection).

This Privacy Policy was last updated on 09 March 2023.