

Western Region Automotive trading as Thomson Ford

Privacy Policy

Version date: January 2014

1. Introduction

1.1 Western Region Automotive Proprietary Limited ABN 72 112718 420 trading as Thomson Ford (“**Thomson Ford**”, “**we**”, “**our**” and “**us**”) is committed to responsible privacy practices and to complying with the Privacy Principles contained in the Privacy Act 1988 (Cth) (“**Privacy Act**”). Where applicable, Thomson Ford will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the Privacy Act and any other applicable exemptions in the Privacy Act or other legislation.

1.2 This Privacy Policy sets out our policies on the management of personal information including how we collect personal information, the purposes for which we use this information, and to whom this information is disclosed.

1.3 We may change our Privacy Policy from time to time at our discretion. At any time, the latest version of our Privacy Policy is available from our website at www.thomsonford.com.au.

2. What is personal information?

2.1 In this Privacy Policy, “personal information” has the meaning set out in the Privacy Act. Essentially, personal information is information or an opinion about an individual who is reasonably identifiable.

3. What types of personal information does Thomson Ford collect?

3.1 The types of personal information Thomson Ford collects from you depend on the circumstances in which the information is collected.

3.2 Thomson Ford may collect contact details including your name, address, email address and phone and fax numbers.

3.3 Where relevant, Thomson Ford may also collect your driver’s licence and registration details, date of birth or age group, occupation, gender, information about your vehicle (including its number plate and vehicle identification number), answers you provide to questions we ask and other information in relation to your dealings with Thomson Ford (such as types of vehicle purchased and replaced and repair/service history).

3.4 If you are an individual contractor to Thomson Ford, in addition to the information referred to in section 3.3 we may collect information relevant to your engagement with Thomson Ford including qualifications, length of engagement, resume, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of Thomson Ford equipment (e.g. phones, computers and vehicles). A reference to an individual contractor in this document includes those individuals who perform work for Thomson Ford under a “purchased service” arrangement. If you are

employed by or contracted to Thomson Ford, we may also collect and maintain training records about you.

3.5 When using the Thomson Ford website, we may collect web site usage information such as the IP address you are using, the name of your Internet service provider, your browser version, the web site that referred you to us and the next website you go to, the pages you request, the date and time of those requests and the country you are in. Except where you provide it to us via the website, we do not collect personal information such as your name, mailing address, email address or phone number when you are browsing our website.

3.6 Thomson Ford does not generally require customers to disclose any sensitive information (e.g. details of race, religious beliefs, sexual orientation, health information etc.) to us. In limited circumstances, we may require prospective employees and individual contractors to provide us with certain health information. See **section 10** of this Privacy Policy for further details.

3.7 If you do provide sensitive information to us for any reason (for example, if you provide us with information about a disability you have), you consent to us collecting that information and to us using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

3.8 Occasionally, sensitive information in relation to an individual's membership of a trade or similar association may be provided to us but we do not actively seek this information. We will only use and disclose that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

3.9 In addition to the types of personal information identified above, Thomson Ford may collect personal information as otherwise permitted or required by law.

4. How do we collect your personal information?

4.1 Thomson Ford collects personal information in a number of ways. The most common ways we collect your personal information are:

- directly from you when you purchase Thomson Ford related goods or services;
- via our website or when you deal with us online (including through social media);
- via our market research agencies;
- when you enter a competition or promotion;
- if you are an individual contractor to Thomson Ford, from your employer or recruitment agency;
- from publicly available sources;
- from our related companies; and
- from third parties (for example, from referees if you apply for a position as an employee or contractor with us).

5. For what purposes do we collect, use and disclose your personal information?

5.1 The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical we endeavour to inform you why we are collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

5.2 We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise authorised or required by law.

5.3 In general we collect, use and disclose your personal information so that we can do business together and for purposes connected with our business operations.

5.4 Some of the specific purposes for which we collect, use and disclose personal information are as follows:

- to facilitate your request for a brochure or test drive, to add you to a mailing list or to respond if you request information (including via the Thomson Ford website or via an email you send to us);
- to record and maintain the details of your purchase of a vehicle for warranty purposes or your purchase of a "myFord" product or service for administration purposes;
- to keep track of the repairs and servicing of your vehicle;
- to facilitate the provision of roadside assistance and other services you acquire from us or our agents or contractors;
- to inform you in the event of a field service action, for example a recall, affecting your vehicle;
- to issue service reminders;
- to improve our products and services;
- to contact you (directly or through our service providers and marketing research agencies) to obtain your feedback and to find out your level of satisfaction with our products, services and through surveys;
- to verify your identity;
- to facilitate your entry and participation in a competition or trade promotion;
- to consider you for a job at Thomson Ford (whether as an employee or contractor) or other relationships with us;
- to provide goods or services to you or to receive goods or services from you;
- to address any issues or complaints that we or you have regarding our relationship; and
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

5.5 We may also use and disclose your personal information for the purpose of direct marketing to you where:

- you have consented to us doing so; or
- it is otherwise permitted by law.

5.6 Direct marketing involves communicating directly with you for the purpose of promoting goods or services to you and to provide you with special offers from Thomson Ford. Direct marketing can be delivered by a range of methods including mail, telephone, email or SMS. You can unsubscribe from our direct marketing, or change your contact preferences, by contacting us (see section 15 of this Privacy Policy).

6. What happens if you don't provide personal information?

6.1 Generally, you have no obligation to provide any personal information requested by us. However, if you choose to withhold requested personal information, we may not be able to provide you with the products and services that depend on the collection of that information.

6.2 As an example, if we did not collect personal information about your new vehicle purchase, we would be unable to notify you directly of a product recall affecting your vehicle.

7. To whom do we disclose personal information?

7.1 We may disclose your personal information to third parties in connection with the purposes described in **section 5** of this Privacy Policy.

7.2 This may include disclosing your personal information to the following types of third parties:

- our related companies;
- our contractors (including mailing houses, marketing agencies, insurance providers, website and data hosting providers and other IT suppliers);
- other persons who perform services for, or in connection with, us (including to facilitate the delivery of purchases, to provide roadside assistance, to autoclubs, for electronic direct mailing, for credit card payment authorisation, for trend analysis, for market research, for promotions and for the provision of statistical sales information to industry bodies);
- companies who may use your personal information in order to tailor electronic advertising to you (e.g. on a webpage) in relation to our products and services;
- our accountants, insurers (including those that provide extended warranties), lawyers, auditors and other professional advisers;
- if you are an individual contractor to Thomson Ford, to your employer or agency in relation to the performance of your work with Thomson Ford;
- if you are an individual contractor to Thomson Ford or a prospective employee, to our medical service providers for any medical assessments or in relation to any health or safety incidents and to HR related service providers (e.g. for background checks, screening or aptitude testing);
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees);
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors;
- third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- otherwise as permitted or required by law.

7.3 Where we disclose your personal information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the Privacy Principles under the Privacy Act, e.g. by (where commercially practical) including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your personal information.

7.4 If you post information to certain public parts of our website or to our social media pages, you acknowledge that such information may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

8. Does personal information leave Australia?

8.1 Some of the third parties to whom we disclose personal information may be located outside Australia. For example, we may disclose personal information to our related companies overseas and to our overseas service providers.

8.2 The countries in which these third parties are located will depend on the circumstances. In the ordinary course of business we commonly disclose personal information to parties located in the United Kingdom. Except where an exception applies under the Privacy Act, we will take reasonable steps to ensure that such overseas recipients do not breach the Privacy Principles in the Privacy Act in relation to such information.

9. How do we protect personal information?

9.1 Thomson Ford 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 consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth). Please notify us immediately if you become aware of any breach of security.

9.2 Your personal information will not be “sold” by Thomson Ford to any other organisation for that organisation's unrelated independent use.

10. What about information you provide in job applications?

10.1 If you submit a job application to Thomson Ford, we will use the information provided by you to assess your application. Thomson Ford may disclose the information contained in your application to contracted service providers for purposes such as screening, aptitude testing, medical testing and human resources management activities.

10.2 As part of the application process or (if you are successful in being employed by Thomson Ford) after you commence employment with Thomson Ford, you may be required to complete a health questionnaire. You may also be asked to undergo a medical assessment. In that case, you will be asked to give specific consent for Thomson Ford to disclose your questionnaire to its service providers for the purposes of the medical assessment and for the relevant service providers to disclose the results of the assessment to Thomson Ford.

10.3 If you refuse to provide any of the information requested by Thomson Ford, or to consent to Thomson Ford disclosing your questionnaire to its service providers for the purpose of a medical assessment or to the disclosure of the results of your medical assessment to Thomson Ford, we may be unable to consider your application (or if you have been successful in being employed by ThomsonFord, we may not be able to consider you for particular roles or positions within Thomson Ford).

10.4 Thomson Ford will handle health information in accordance with applicable laws and our Health Information Policy.

11. Is the personal information we hold accurate?

11.1 We endeavour to maintain your personal information as accurately as reasonably possible. We rely on the accuracy of personal information as provided to us directly from you.

11.2 We encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information. Our contact details are set out in section 15 of this Privacy Policy.

12. Links, cookies and use of the Thomson Ford website

12.1 The Thomson Ford website contains links to other sites. This Privacy Policy applies to the Thomson Ford website and not any linked sites. We encourage you to read the privacy policies of each website that collects your personal information.

12.2 Thomson Ford uses technology such as "cookies", "pixel tags" and java code on Thomson Ford websites and in emails you have agreed to receive from us. The use of "cookies", "pixel tags" and java code is an industry standard, and helps us monitor the effectiveness of our advertising and how visitors use the Thomson Ford websites. A "cookie" is a small data element stored by your web browser on your computer system. Thomson Ford website "cookies" do not store your email address or other personal information about you.

12.3 We use this technology to generate statistics and measure site activity to improve the usefulness of customer visits. During normal website usage we do not collect or store personal information such as your name, mailing address, email address or phone number.

12.4 Each time you access Thomson Ford websites, the Thomson Ford server may deliver certain customised information, including ads, to you based on the data stored in your cookie. Third party vendors may show our ads on sites on the Internet and serve these ads based on a user's prior visits to our website and other Internet activity. Thomson Ford may also use analytics data supplied by third party vendors to inform and optimise our ad campaigns.

13. How you can access and correct personal information we hold about you

13.1 You may seek access to personal information which Thomson Ford holds about you by contacting us as described in section 15 of this Privacy Policy. We will provide access to that information in accordance with the Privacy Act, subject to certain exemptions which may apply. We may require that the person requesting access provide suitable identification and where permitted by law we may charge an administration fee for granting access to your personal information.

13.2 If you become aware that any personal information we hold about you is incorrect or if you wish to update your information, please contact Thomson Ford (see **section 15** of this Privacy Policy).

14. Queries, comments and complaints about our handling of personal information

14.1 If you have any questions, concerns or complaints about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Privacy Act, please contact us (see **section 15** of this Privacy Policy).

14.2 When contacting us please provide as much detail as possible in relation to your question, concern or complaint.

14.3 Thomson Ford will take any privacy complaint seriously and any complaint will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

14.4 If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner (click [here](#) for information).

15. Contact details

15.1 Please address all privacy complaints to:

Attention: Privacy Officer

Thomson Ford

PO Box 9782, Harris Park NSW 2150

OR

privacy@thomsonautomotive.com.au

15.2 If you wish to seek access to or correct or update any personal information we hold about you, or to unsubscribe from or change your contact preferences in relation to our direct marketing, you can also contact us as follows:

- phone Thomson Ford on(02) 9635 7466;
- email us at privacy@thomsonautomotive.com.au