

1 Protecting your privacy

The worldwide rental system operated as **Europcar** is owned by Europcar International, a French Corporation. A number of independently owned licensees also trade as **Europcar** in Australia, New Zealand and internationally.

In Australia, **Europcar** is the trading name of CLA Trading Pty Limited ABN 81 082 220 399. In New Zealand **Europcar** is the trading name of BVJV Limited.

For the purposes of this Privacy Policy, **Europcar** refers to CLA Trading Pty Ltd and our Related Entities in Australia and in New Zealand, to BVJV Limited and our Related Companies (**We, Us**).

We draw your attention to section 3 of our policy and the use by Europcar of vehicle GPS tracking devices. By hiring a Europcar Vehicle, you expressly consent to Europcar using tracking devices on the Vehicle during the rental period and collecting, using and retaining information from the tracking devices in accordance with Our Privacy Policy.

This document provides you with information on how we collect, use, store and disclose your personal information. If you want more information, please use the contract details set out in section 15 of this document.

2 Definitions

In this policy:

Personal Information has the meaning given under the Privacy Act.

Privacy Act means the *Privacy Act 1988* (Cth) or where applicable, the *Privacy Act 1993* (NZ).

Related Entities has the same meaning as under the *Corporations Act 2001* (Cth) and in New Zealand **Related Companies** has the same meaning as under the *Companies Act 1993* (NZ) and each includes our franchisees.

Sensitive Information has the same meaning as under the Privacy Act.

Services means the offers and services provided by us, including vehicle hire services and the Europcar Privilege Loyalty Programs.

Website means www.europcar.com.au and www.europcar.co.nz and other websites and forms of social media where you post comments or we interact with you.

The meaning of any general language is not restricted by any accompanying example and the words 'includes', 'including', 'such as', 'for example' or similar words are not words of limitation.

3 What Personal Information do we collect and why do we need it?

To provide you with our Services, we need to collect Personal Information. If we do not collect the Personal Information or if any of the Personal Information you provide is incomplete or inaccurate, we may not be able to provide the Services or those Services may be compromised.

Depending on the nature of the Services we provide to you, the personal information we collect may include:

- your name, email address, telephone numbers and address;
- date of birth;
- Sensitive Information, for example, if you advise us of any disability;
- credit card details and expiry dates;
- drivers licence number (including taking a photocopy of your licence); and in Australia, state of origin;
- frequent traveller program number;
- information on a professional group to which you belong (e.g. you may disclose that to obtain a discount available to members of that group);
- vehicle preference;
- company name and employee number;
- contact details of individuals who can provide professional references and other information required in the Cash Qualification process;
- credit reference information from a credit reporting body (as further detailed in section 7);
- reservations and rental details including dates, times and places of vehicle hire;
- vehicle damage circumstances and details; and
- any other Personal Information relevant to the Services we provide to you.

Vehicle tracking and locating

Europcar uses GPS tracking or other electronic tools (**GPS device**) to enable the geographical locations of its vehicles to be tracked or located.

Information from the GPS device may be used:

- to provide information to the police or other authorities in the event that the vehicle is stolen or is not returned at the end of the hire period;
- in the event of an accident or incident relating to the vehicle during the hire period, e.g. to verify the location of the vehicle at the time of the alleged accident or incident;
- to identify the exact location of the vehicle in the event of a reported breakdown and to provide that location to breakdown responders (e.g. the local Automobile Association);
- to identify whether the vehicle is being used in an area prohibited under the terms and conditions of rental;
- to locate the vehicle in the event of an emergency; or
- for any other purpose permitted under the Privacy Act or any other law.

4 How do we collect the Personal Information?

We aim to collect Personal Information directly from you. We may also collect Personal Information:

- when you complete a form, make inquiries or apply to rent a vehicle from or through us;
- from other members of the Europcar Group;
- from your company or organisation when you use our services under a corporate account or other arrangement;
- from our program partners if you are a member of a frequent traveller or other program and rent or make inquiries of renting a vehicle through them;
- from our contracted service providers;
- from credit reporting bodies;
- from debt collection agencies if you (or an entity you are guaranteeing) default in a payment to us;
- through our website, App and by other electronic communication channels (e.g. when you send us an email or post an entry on our Facebook page or other social media sites);
- from third parties;
- from publicly available sources of information;
- when we are required to do so by law;
- when you log onto or connect to our Website and our server automatically records information your browser sends (e.g. your IP address, how and when you travel through our Website, the pages and documents accessed information about your usage (e.g. by way of cookies) and other information provided by downloading information from our website). However, unless your name is part of your email address or you specifically provide it, our server does not automatically collect this information;
- when you enter a competition or promotion with us, participate in a survey or register to receive information from us or register to receive information on any of our Services.

If at any time you supply Personal Information to us about any other person (e.g. another member of your household or you post a photo on our Facebook page), you represent and we accept that information on the basis that you are authorised to do so and that the relevant person has consented to the disclosure to us.

5 Our partners and links to other websites

We have partnered with reputable third parties to offer you a variety of travel services. All travel services throughout our Website that are provided by a third-party partner are described as such. Although we only work with reputable third parties, our business partners may have different privacy policies and practices than Europcar.

There are also several places throughout our Website that may link you to other websites that do

not operate under Europcar information privacy practices. When you click through to these web sites, Europcar websites information privacy practices no longer apply. We recommend that you examine the privacy statements for all third party websites to understand their procedures for collecting, using, and disclosing your information.

Here are our partners:

ACCOR
ADELAIDE FOOTBALL CLUB
AUSTRALIAN FEDERATION OF AIR PILOTS
AIRLINE, HOTEL STAFF CARD
AMY GILLETT FOUNDATION
ANZ GIFT WITH PURCHASE
API LEISURE & LIFESTYLE
ASIA MILES MEMBERS
ASTW MEMBER
BASEBALL QLD
RACQ MEMBER PARTNERSHIP
NBL - MELBOURNE UNITED
SHOW GROUP - BASKETBALL AUSTRALIA
NBL - MEMBER DISCOUNT
NATIONAL BASKETBALL LEAGUE
COLLINGWOOD FOOTBALL CLUB
BRISBANE BASKETBALL
MASTER GROCERS AUSTRALIA
CARLTON FOOTBALL CLUB
CHINESE CREDIT CARD REWARDS
CHOICE HOTELS STAFF RATES
COMMONWEALTH BANK
CONNECTNOW PTY LTD
ESSENDON FOOTBALL CLUB
CPA AUSTRALIA CORP
CRICKET TASMANIA
DIRECT CONNECT AUSTRALIA P/L
DULLARD SARTORI PTY LTD
EASYJET
CYCLING FEDERATIONS & ASSOCIATIONS
HSBC
EMIRATES AIRLINES
ENTERTAINMENT BOOK
FACCI MEMBER DISCOUNT OFFER
FLYING BLUE
INT. POLICE ASSOC (AUST SECTION)
ISIC / ITIC
JETSTAR
LBI AUSTRALIA PTY LTD
LIVELO MEMBER DISCOUNT
LIVE NATION
MASTERCARD GIFT CARDS
MEMBER ADVANTAGE
MEMBER BENEFITS
MERCEDES-BENZ AUSTRALIA CORPORATE
MILES & MORE

MYER ONE
NZ AIRLINE PILOTS ASSOCIATION
PEGASUS GROUP
PERTH GLORY FOOTBALL CLUB
POLICE ASSOCIATIONS AUSTRALIA
QANTAS STAFF
QATAR
QRI LIFESTYLE
S.A.T.C.
SECURE PARKING PTY LTD
SENIORS CARD
SINGAPORE AIRLINES KRISFLYER PROGRAM
SYDNEY SWANS FOOTBALL CLUB (MEMBER)
TENNIS AUSTRALIA
THALYS PARTNERSHIP
TIGER AIRWAYS INFLIGHT MAGAZINE
VELOCITY FREQUENT FLYER
VIRGIN AUSTRALIA

6 CCTV and other imaging

We may film vehicles as they exit and re-enter a Rental Station for security purposes and to confirm the condition of the vehicle and to identify any damage which may have occurred during the rental period. Any film taken of the vehicle may include images of the occupants of the vehicle. The film will be used for the purpose of identifying damage, recovering payment for any damage and any other purpose authorised under the *Privacy Act*.

For security purposes we have CCTV cameras in some of our locations and your image may be recorded.

7 How do we use your Personal Information?

We use the Personal Information we collect for operational purposes and to:

- provide our Services;
- verify the accuracy of the information (including Personal Information) you provide to us when renting a vehicle;
- comply with our contractual and other legal obligations;
- respond to medical emergencies;
- process your inquiries and improve our Services;
- advise you of additional services or information which may be of interest to you;
- develop our products and services.

8 Credit information

This section 8 applies if you apply for credit from us or you are a guarantor or officer of a company to whom we provide credit.

Credit Reporting Bodies

To the extent allowed by law, we may and you authorise us to collect, use and disclose information in respect to any credit we provide to you or an entity which you are guaranteeing, including to a Credit Reporting Body (CRB). This includes Personal Information required to enable the CRB to provide us with a consumer credit report to assist us in assessing your credit worthiness, payment or default information, information about fraud or any other serious credit infringement, information about adverse court judgments or insolvency.

If you, an entity you are guaranteeing, or an entity of which you are a director or officer defaults in the payment of any moneys owed to us, you authorise us to provide Personal Information to the CRB and to obtain an up to date consumer credit report on you.

Personal Information may be used and disclosed by the CRB in accordance with the Privacy Act and the CRB's privacy policy, to create or maintain a credit information file containing information about you and in providing credit assessments to other credit providers.

You may request the CRB not to use or disclose your credit information in some circumstances, e.g. if you believe you are or have been a victim of fraud.

The information given to the CRB may include:

- personal particulars (e.g. your name, sex, address, previous addresses, date of birth, name of employer and your driver's licence number);
 - details concerning your application for credit or commercial credit and the amount requested;
 - advice that we are a current credit provider to you;
 - advice of any overdue accounts, loan repayments and / or any outstanding monies are no longer overdue in respect of any default that has been listed;
 - that your overdue accounts loan repayments or any outstanding monies are no longer overdue in respect of any default that has been listed;
 - information that, in our opinion you have committed serious credit infringement (that is fraud or you have shown an intention not to comply with your credit obligations);
 - advice that cheques drawn by you or payments made by you for one hundred and fifty dollars (\$150.00) or more, have been dishonoured more than once; or
 - that credit provided to you by us has been paid or otherwise discharged.
- Information about the CRBs we use may be obtained from our Privacy Officer, whose details are set out below.

Other credit providers

You also agree and authorise us to exchange information about you with other credit providers named in a consumer credit report issued by a CRB for the following purposes:

- to assess an application by you;
- to assess your creditworthiness;
- to notify those other credit providers of any default by you or the rectification of any default; or
- to ascertain the status of a credit account where you are in default.

You understand and agree that the information exchanged includes anything about your credit worthiness, credit standing, credit history or credit capacity, subject to the restrictions imposed on credit providers under the *Privacy Act*.

You agree that personal credit information provided may be used and retained by us for the following purposes (and for other purposes as agreed between us or as required or authorised by law from time to time):

- the provisions of goods and services;
- analysing, verifying or checking your credit, payment or status in relation to the provisions of goods or services;
- processing of any payment instructions, direct debit facilities or credit facilities requested by you; or
- enabling the daily operation of your account or the collection of amounts outstanding to us for the provision of goods or services.

9 Marketing

We may use and disclose your personal information to provide you with information on offers, products and services offered by the Europcar Group, its Related Entities or Related Companies, franchisees and licensees. We may also provide you with information on other products and services offered by Europcar Group, its partners or affiliates.

We do **not** use Sensitive Information for marketing purposes.

If at any time you no longer wish to receive any additional marketing material from us or do not want your information disclosed for direct marketing purposes, contact our Privacy Officer and we will remove your details from our marketing database.

10 Disclosure of personal information

We may be required to disclose your Personal Information by law, by court order or to investigate suspected fraud or other unlawful activity.

We may also disclose your Personal Information to third parties in certain circumstances including:

- if you agree to the disclosure;
- when we use it for the purpose for which it was collected, e.g. to provide you with Services;

- in circumstances where you would reasonably be expected to consent to information of that kind being passed to a third party;
- where disclosure is required or permitted by law;
- where it is required to be disclosed for audit purposes;
- to our Related Entities or Related Companies;
- if disclosure will prevent or lessen a serious or imminent threat to someone's life or health; or
- where it is reasonably necessary for the enforcement of the criminal law, a law imposing a pecuniary penalty or for the protection of public revenue.

We do not disclose sensitive information about you unless you agree or, in the circumstances of disclosure, would reasonably expect us to make the disclosure.

11 Disclosure of personal information off-shore

Because the Europcar Group operates internationally, your personal information will be accessible by Europcar International, Europcar Group staff, franchisees and licensees in countries other than Australia and New Zealand. This may include Sensitive Information.

If you access another Europcar website or a partner or service website (e.g. hotel bookings, airline) from our Website, you are transferring to another country and to a website over which we have no control and take no responsibility. If you provide personal information using another Europcar website or a service website, you do so such to the privacy laws (if any) in that jurisdiction.

The overseas recipient may not be subject to any privacy obligations or to any principles similar to the Australian Privacy Principles or the New Zealand Information Privacy Principles. The overseas recipient may also be subject to a foreign law which could compel disclosure of personal information to a third party, for example, an overseas authority.

If you consent to the disclosure and the overseas recipient handles the information in breach of the Australian Privacy Principles, you will not be able to seek redress under the Privacy Act, may not be able to seek redress in the overseas jurisdiction and we will not be accountable under the Privacy Act.

By providing us with personal information, you consent to us using and disclosing your personal information off-shore. If at any time you wish to withdraw your consent, contact our Privacy Officer. However, we may not be able to provide the Services you have requested in whole or in part or those Services may be compromised.

12 Considerations when you send information to us

While we do all we reasonably can to protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure, including investing in security software, no data transfer over the Internet is 100% secure.

If you access a partner or service website (e.g. hotel, airline) from our website, you do so and provide personal information in accordance with the terms and conditions under which the provider of that website

operates.

The open nature of the Internet is such that information exchanged via the Internet may be accessed and used by people other than those for whom the data is intended. If you send us any information, including (without limitation) Personal Information, it is sent at your own risk.

While we are not in a position to give you advice on Internet security, if you provide Personal Information to us electronically (e.g. by way of our website or using an App), there are some things you can do which may help maintain the privacy of your information, including:

- ALWAYS closing your browser when you have finished your session;
- NEVER providing Personal Information when using a public computer; and
- NEVER disclosing your user name and password to another person.

You are responsible for all actions taken using your username, email or password. If at any time you believe your username or password has been compromised, you should immediately contact us and also change your password.

You should also contact us immediately if you believe:

- someone has gained access to your Personal Information;
- we have breached our privacy obligations or your privacy rights in any way; or
- you would like to discuss any issues about our privacy policy.

13 How your information is stored

We endeavour to keep our information systems and files secured from unauthorised access. Those who work with us are aware of the importance we place on protecting your privacy and their role in helping us to do so.

Our procedures to securely store Personal Information include electronic and physical security measures, staff training and use of password protection software.

When the Personal Information that we collect is no longer required, we will remove or de-identify the Personal Information as soon as reasonably possible. We may, however, retain Personal Information for as long as is necessary to comply with any applicable law, for the prevention of fraud, for insurance and governance purposes, in our IT back-up, for the collection of any monies owed and to resolve disputes.

14 How you can update, correct, or delete your Personal Information

You may request access to your Personal Information or correct any inaccurate or out of date information by clicking [here](#) or contacting our Privacy Officer using the details below. For security purposes, before we provide you with personal information, we will ask you to provide evidence of your identity.

You may request the source of any information we collect from a third party. We will provide this at no cost, unless under the Privacy Act or other law there is a reason for this information being withheld.

If there is a reason under the Privacy Act or other law for us not to provide you with information, we will

give you a written notice of refusal setting out the reasons for the refusal except to the extent it would be unreasonable to do so and the mechanisms available to you to complain about the refusal.

15 Changes to our Privacy Policy

This document sets out our current Privacy Policy.

Our Privacy Policy will be updated from time to time. You should review our Privacy Policy each time you visit our Website or provide us with Personal Information.

16 Contact details

If you would like further information on our Privacy Policy or if you have any concerns over the protection of the information you have given to us or that we have collected from others, please contact us by contacting our Privacy Officer at:

Attention: The Privacy Officer

Mail: Europcar Asia Pacific

189 South Centre Road

PO Box 1139

Tullamarine VIC 3043

AUSTRALIA

Email: info@europcar.com.au (for Australian rentals) or info@europcar.co.nz (for New Zealand rentals)

We will respond to your query within 30 days.

More information about your rights and our obligations in respect to privacy and information on making a privacy complaint are available from:

In Australia, the Office of the Australian Information Commissioner at:

Website: www.oaic.gov.au

Post: GPO Box 5218 Sydney NSW 2001

Email: enquiries@oaic.gov.au

In New Zealand, the Privacy Commissioner at:

Website: www.privacy.org.nz

Post: PO Box 10-094, The Terrace, Wellington 6143.

Email: enquiries@privacy.org.nz