

# PRIVACY POLICY

## INTRODUCTION

LSH Auto (Melbourne) Pty Ltd ACN 618 554 635 and our affiliates (collectively **LSH Auto, we, us or our**) respect your privacy and will collect, store, use and disclose your personal information in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**), including the Australian Privacy Principles, and this privacy policy (**Privacy Policy**). A reference to "personal information" in this Privacy Policy has the meaning given under the Privacy Act, and is essentially information or an opinion about you as an identified (or reasonably identifiable) individual.

This Privacy Policy is intended to provide an overview of our policies in respect of the handling of your personal information. It explains how we manage the collection, storage, use and disclosure of personal information and how to contact us if you have any queries or complaints about our management of your personal information.

This Privacy Policy is intended to cover most personal information handled by us, but is not exhaustive. When we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose. Your use of our websites, social media platforms, products and services may also be subject to other policies we implement from time to time, including specific terms of use. These policies or terms may override this Privacy Policy in certain circumstances. If you have any queries about our handling of your personal information, please contact us for further information.

LSH Auto is an organisation and "APP Entity" for the purposes of the Privacy Act and is subject to the Australian Privacy Principles. No general exemptions under the Privacy Act apply to us or to any of our acts and practices.

If you do not agree to the terms of this Privacy Policy you must immediately discontinue use of our websites (including any located at a domain or subdomain owned by us), including [www.mbmelbourne.com.au](http://www.mbmelbourne.com.au) and [www.mbmelbourneairport.com.au](http://www.mbmelbourneairport.com.au) (**Websites**), and our social media platforms, products and services (collectively **Services**).

## HOW WE COLLECT, HOLD AND USE PERSONAL INFORMATION

### INFORMATION WE COLLECT

We will collect your personal information directly from you unless it is unreasonable or impracticable to do so, and will limit the personal information we collect to that which is reasonably necessary for our functions or activities.

So that we can provide you with our Services, we collect a range of personal information, including:

- **Information you provide to us when accessing or using our Services.** We collect information you provide to us, including, but not limited to:
  - your name, email address, telephone number, occupation, vehicle registration details, driver's licence details, financial information, and current and past vehicle information. The specific information we collect will depend on the circumstances of our interaction with you, but we often collect some or all of these kinds of information when you access or use our Services, participate in our promotions or competitions, or when you visit us to test drive or purchase a vehicle or arrange to have your vehicle serviced or repaired, or if you apply for a position or employment with us;
  - your credit card details, bank account information and/or billing information if required to process a transaction with you, for example if you purchase products or services from us. Credit card details are not stored in any form by us or on any internal or external databases that are accessible to us; and

- any other information you may choose to provide to us. For example, when you communicate with us (whether by telephone, email or SMS) we will collect your contact details and any other information you volunteer to us.
- **Information about your use of our Website.** We also collect information when you use or access our Website. Our collection and use of this information is discussed below in the section headed "Website Usage, Tracking Information and Cookies".

We do not generally collect (or, if it is provided by you to us, retain) any "sensitive information" (as that term is defined in the Privacy Act) about you.

When collecting your personal information, we will take reasonable steps to make you aware of the purposes for which we are collecting it, the types of organisations to which we would usually disclose it, whether we are likely to disclose it to overseas recipients (and where practicable the countries in which they are located), whether there are laws or court/tribunal orders which require or authorise us to collect it, and the main consequences for you if you fail to provide it to us. This Privacy Policy provides these details as they typically apply in most cases, however different details may apply depending on our specific interaction with you. If we do not notify you of such other details, the information in this Privacy Policy applies.

If you fail to provide personal information requested by us, there may be a range of consequences, for example we may not be able to respond to your enquiry or otherwise provide you with our Services. There will not usually be Australian laws or court/tribunal orders which require or authorise us to collect your personal information.

We may, in some circumstances, collect personal information about you from third parties, in which case we will take reasonable steps to notify you of that information and the circumstances of its collection. Some specific circumstances in which we collect personal information from other sources may include collection from:

- other members of LSH Auto's corporate group. The Privacy Act allows the sharing of certain personal information within our corporate group (ie, the collection of personal information from a related body corporate);
- customers or other individuals who provide us with information about you, such as joint owners, family members or referees;
- third party suppliers such as roadside assistance service providers;
- publicly-available sources such as data aggregators, public databases and other commercial providers, and information that you or others may post online, eg on social media platforms. This may include information such as your name, demographic, interests and other publicly-available data. We (or our service provider on our behalf) may combine this information with other information including information we collect directly from you. We may also associate information about your use of our digital services over time with your personal information, eg where on any occasion you have logged in, followed a link sent to you by email or where we have otherwise been able to identify you;
- Austroads Ltd's National Exchange of Vehicle and Driver Information System if we are conducting a recall; and/or
- government bodies including but not limited to enforcement or regulatory authorities.

Where you provide personal information about other individuals to us (for example, joint owners, family members or referees), you must inform those individuals that you are doing so, provide our contact details and inform them that they may view this Privacy Policy or contact us for further information. We will handle personal information on the basis that this has occurred.

## USE OF INFORMATION

We will generally only use your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations. Purposes for which we may use your personal information include to:

- provide the products and services requested, respond to your enquiries, send you information that you request, or otherwise achieve the purpose for which the information was submitted to us;
- facilitate the sale of our products or services, or the products and services of third parties;
- set-up and configure customer accounts, and identify our customers, potential customers and people acting on their behalf;
- record and maintain user details and profile information;
- contact you to invite you to events (such as a new program we are launching) or inform you about new Services we provide;
- deliver marketing materials to you regarding new Services and offers we believe may be of interest to you, and conduct market research, marketing or promotional activities;
- improve our Services, for example conducting customer satisfaction surveys following the purchase of a vehicle from us or following vehicle servicing;
- provide customer support including responding to your concerns and resolving disputes;
- help us plan for the future by using some information for administrative purposes such as statistical information (with such statistical information usually being de-identified);
- compare information provided by you for accuracy and verify it with third parties; and
- engage in other activities where required or permitted by law.

Where we propose to use your personal information for another purpose other than as outlined above, we will generally seek your permission (unless we are required or permitted by law to do so without seeking consent).

## STORAGE AND SECURITY

We will take reasonable steps to keep the information we hold about you secure and protect your personal information from misuse, interference and loss as well as unauthorised access, modification or disclosure.

Information stored by us is protected by our security access policies and procedures. For example, personal information we collect and store on our computer network is stored on secure servers and is only accessible by those persons who need access to the information to carry out their business functions. We also maintain physical security measures to protect tangible (hard-copy) records containing personal information.

We undertake regular monitoring of our practices, procedures and systems to ensure the effectiveness of our security policies and identify and implement improvements where appropriate. However, no method of transmission or electronic storage is completely secure, and we cannot guarantee the security of data, particularly if it is transmitted through services such as the Internet or third-party platforms (eg, email or social media platforms). You transfer your personal information to us at your own risk.

If your information is disclosed to third-party service providers, we will ordinarily enter into arrangements which require them to maintain the security of your information.

We will endeavour to destroy or de-identify your personal information as soon as it is no longer required by us (where permitted by law). When we dispose of personal information, we endeavour to ensure that it is destroyed or permanently de-identified in a secure manner.

## DISCLOSURE OF PERSONAL INFORMATION

We will generally only disclose your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

We may disclose your personal information to others, including but not limited to:

- other members of LSH Auto's corporate group. The Privacy Act allows the sharing of certain personal information within our corporate group (ie, the disclosure of personal information to a related body corporate);
- third party suppliers such as the vehicle manufacturer, Mercedes-Benz Australia/Pacific Pty Ltd, where necessary for us to provide products to you and for related purposes such as administration of your vehicle manufacturer's warranty;
- third party providers of financial and credit services, such as Mercedes-Benz Financial Services Australia Pty Ltd, where you apply for finance offered by a provider in connection with the purchase of a vehicle from us;
- service providers contracted by us, including information technology service providers, printers and distributors of marketing materials, creditors, banks, financiers, credit providers, insurers and external business advisors (such as auditors and lawyers);
- third parties as necessary in order to detect and prevent fraud and protect the rights, property and safety of our business, you and others; and
- third parties as necessary in order to enforce our policies and agreements.

We may disclose your personal information to overseas recipients if it is required to fulfil the purpose for which we collected it, in which case we take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles. However, we are not generally likely to disclose personal information to overseas recipients other than our parent company located in Hong Kong SAR in order to comply with reporting and other corporate obligations.

## ACCESS TO, AND CORRECTION OF, PERSONAL INFORMATION

You may contact us to request access to or correction of the personal information about you that we hold, in which case we will respond to your request within a reasonable period after the request is made. We may refuse your request to allow access or to amend your personal information (or only partially comply with such a request) if we are legally required or entitled to do so. In that case, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) together with information about the options available to complain about the refusal.

We may require you to pay certain costs in order to access your personal information held by us. We will advise the amount payable (if any) once we have assessed your application for access. We will not however charge a fee for you to lodge a request for access to or correction of your personal information.

If you lodge a request for access to your personal information, we request that you identify, as clearly as possible, the types of information requested. We may fulfil that request in any of a range of ways (for example, by supplying you with a copy of that personal information or providing you with the opportunity to inspect our records). We may require you to comply with certain procedures before we allow access to or amendment of your personal information to ensure the integrity and security of information that we hold. Depending on the nature of your request, this may include verifying your identity to our satisfaction.

We will take reasonable steps to ensure that the personal information that we collect, use and/or disclose is accurate, up-to-date and complete and relevant. If we are satisfied that any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will amend our records accordingly.

Please notify us if your personal details change so that we may keep our records current.

## WEBSITE USAGE, TRACKING INFORMATION AND COOKIES

We collect limited information about people who use our Services so that we can track the use of those resources, maintain and improve our Services, and understand how our users navigate through and use our Services. We do not use these technologies for tracking of any information about your use of other websites or services. Information we collect may include:

**Commented [TG1]:** Please confirm that the sections regarding the websites, Google Analytics and Facebook Pixel also apply to the dealership websites.

- details about you and your device, such as your IP address, top level domain names, location or device information, and any other information provided by your mobile device, if you access or use our Website via a mobile device or application. If you do not want us to collect your location information you may be able to disable the GPS or location-tracking function of your device;
- data collected using any integrated plugins on our Website. Where this data is collected by a third party (which we will generally seek to make you aware of) please refer to the third party's privacy statement to understand their data handling practices as we do not control the information you may share with them;
- data related to use of cookies on our website. We use both first-party and third-party cookies and similar tracking technologies on our Website. A cookie is a small data file that is stored on your device and collects information, such as your IP address or information about your use of or your activities on our Website. Further information about this is detailed below;
- data relating to your use of our Website, which may include your IP address, data, and time of your access or use of our Website, page views and documents downloaded, the referring URLs, and any other information about your activities on our Website; and/or
- search terms, interactions with other users, and any other activities on our Website.

(collectively, **Usage Information**).

In order to collect Usage Information, we may use software embedded in our Websites (such as JavaScript) and we may place small data files (cookies) on your computer or other device. We may also use third-party services such as Google Analytics, Facebook Pixel and Adobe Analytics (see below), to track Usage Information in relation to our products and services.

Unless you have registered for an account with us, we will not link Usage Information to your personal information such as your user name. If you register for an account with us, Usage Information may be associated with your registration data. If you do not register for an account with us, Usage Information will be aggregated with that of other unregistered users and will not be associated with an identifiable person.

You may decline our cookies if your browser or browser add-on permits, but doing so may interfere with your use of our Websites, products and services. You can refer to the documentation for your browser or installed applications for instructions on blocking, disabling or deleting cookies.

## GOOGLE ANALYTICS

We use certain Google Analytics Advertising Features (including remarketing, Demographics and Interests reporting and Google Display Network Impression Reporting). These features make use of cookies and similar technologies, analytics, and other identifiers to collect data about website traffic. We understand that Google Analytics does not collect your personal information nor does it associate your IP address with any other data held by Google. For more information about Google Analytics and how it collects and processes data, click here <https://analytics.google.com/analytics/web/provision/#/provision>.

In addition to making the advertisements you see interest-based, these features also allow our advertisements to be displayed to you by third-party vendors (such as Google) when you are visiting other websites across the Google Display Network, and to understand how you interact with those advertisements. For example, third-party vendors use cookies to select ads based on users' browsing history including previous visits to our website. Our use of Google Ads (and in particular, remarketing, affinity audiences, custom affinity audiences, in-market audiences, similar audiences and demographic and location) assists us to provide targeted marketing to our customers and potential customers.

By using our websites you consent to the storing and accessing of cookies or other information on your device for the purposes of Google Analytics, unless you have opted out. To opt-out you may be able to install the Google Analytics Opt-out Browser Add-on. You may also be able to opt out of Google Analytics Advertising Features, such as interest-based advertising served by Google on its products or across the Google Display Network through the Google Ads Settings or other available means (for example, the Network Advertising Initiative opt out). The Google opt-outs may not stop all advertising. Google may still serve advertising that is not interest based, and you may still receive interest based advertising that is not served by Google.

## FACEBOOK PIXEL

Our websites may use the Facebook pixel (**Pixel**), which is a website feature which allows us to receive information on user activity on our website from users that have been redirected to our website by clicking on our Facebook advertisements. This enables us to measure the effectiveness of our Facebook advertisements for statistical and market research purposes. The Pixel does not collect any personal information of individual users. The data collected by the Pixel is stored and processed by Facebook, which has ultimate control of the information gathered through the Pixel. Facebook may link the information collected from the Pixel to your Facebook account and also use it for its own promotional purposes in accordance with Facebook's Data Usage Policy: <https://www.facebook.com/about/privacy/>. You may be able to opt-out of our use of the Pixel through the settings of your Facebook Account. By using our website you consent to our use of the Pixel, unless you have opted out.

## ADOBE ANALYTICS

Our websites may use Adobe Analytics tools, including Analytics Workspace. These tools collect information about our website visitors and their experiences on our website. We use this information to help us optimise our website design and usability to meet the needs of our website visitors. Adobe Analytics may collect certain information, such as your IP address, the webpage that led you to our website, the search terms that you entered into a search engine which led you to our website, and your general use of our website. We understand that this information is collected and stored on Adobe's data collection servers. We may access this information for marketing and other purposes. We understand that Adobe Analytics does not collect your personal information. For more information about Adobe Analytics, and how it collects and processes information, click here: <https://docs.adobe.com/content/help/en/analytics/analyze/reports-analytics/reporting-interface/overview-data-collection.html>.

You may be able to limit the information collected through Adobe Analytics by managing your browser settings regarding cookies.

## THIRD-PARTY LINKS

Our Services may include links to other websites whose operators' privacy practices may differ from ours. If you provide your personal information to any of those sites, your information will be governed by those operators' privacy policies.

## CHANGES AND UPDATES

We reserve the right to amend this Privacy Policy at any time. We publish our current Privacy Policy on our website, and you may obtain a copy of our Privacy Policy from our website or by contacting us. We encourage you to periodically review this page for the latest information on our privacy practices.

You can determine when this Privacy Policy was last revised by referring to the "Last Updated" legend at the top of this page.

## COMPLAINTS

If you believe that a breach of your privacy has occurred, we encourage you to contact us to discuss your concerns. Our contact details can be found below.

Your complaint will be considered and dealt with by our LSH Auto Australia Group Privacy Officer. The Privacy Officer may escalate the complaint internally within our organisation if the matter is serious or if necessary to resolve it. We will treat your complaint confidentially and, after investigating your complaint, may contact you to discuss the ways in which we can remedy the situation.

- 7 -

Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our proposed resolution, you may make a complaint to the Office of the Australian Information Commissioner, whose contact details can be found at: [www.oaic.gov.au](http://www.oaic.gov.au)

## **FURTHER INFORMATION**

You may contact us if you require further information about the ways we manage your personal information.

**Emilia Simone**

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