

The privacy policy is effective from 24 May 2020

## **1. Our commitment to privacy**

The privacy of our customers is of highest importance to Bargain Car Rentals Australia Pty Ltd (ACN 115 153 930) (**Bargain Car Rentals**).

This Privacy Policy sets out how we manage personal information across our business. It also applies to your use of the Bargain Car Rentals website, your dealings with Bargain Car Rentals as a customer and any third party information which may be collected by us.

Bargain Car Rentals may update this Privacy Policy from time to time. The most current version will always be located on our website.

## **2. Types of personal information we collect and hold**

The types of personal information we collect and hold will vary depending on your dealings with Bargain Car Rentals and the products provided to you, or a request or inquiry you make in relation to such products and services.

This information may include any or all of the following:

- Name, address(es), telephone number(s) and other contact details;
- Electronic address(es);
- Date of birth and age;
- Gender;
- Credit card details;
- Details of your membership to any loyalty or affiliate program;
- Driver's license number and/or passport number and, upon our request, a copy of your driver's license or passport;
- Transaction details relating to your use of our products, services or other benefits;
- Your social media preferences; and
- Any preferences you tell us about or any other information that you provide.
- We may collect and hold sensitive information, such as the fact that you are disabled, to allow us to provide our services more effectively to you but only if you provide express consent at the time it is provided.

Please see the Direct Marketing section of this policy for more examples of the kinds of personal information we collect.

## **3. Website cookies and digital services**

We collect and hold such information for statistical and maintenance purposes that enables us to continually evaluate our website performance. Some parts of our websites also use "cookies". A "cookie" is a small text file that is placed on your computer's hard drive by a web page server. Cookies store information about the use of our website and are used to identify new or previous visitors to the website and what pages have been accessed. Most web

browsers are set to accept cookies, but this function can usually be disabled if you wish. Please note that if you do disable this, not all functionality on our websites will be available to you.

We also use Google Analytics features (including Google Remarketing, Google Display Network Impressions Reporting, the Double Click Campaign Manager and Google Analytics Demographics and Interest Reporting) on our website, which uses both first party and third party cookies to record standard internet traffic information. We, and some third parties (including Google), also use the information to optimise ad selection for groups of individuals based on age, gender, interests and past visits to our site. The cookies allow us and other third parties (including Google) to evaluate your interactions with ad services on our site and serve targeted advertising on sites across the Internet. We have enabled Google Analytics for Display Advertising which allows Google and other third parties to advertise to you on our site and across the Internet.

By using Google Ads Settings ([www.google.com/settings/ads](http://www.google.com/settings/ads)), you can opt out of these features at any time and customise your Google Display Network Ads.

Importantly, we do not combine the anonymous information collected through Google Analytics with personally identifiable information.

In addition to Google Analytics, we use a range of web analytics tools (such as web beacons) to help us understand consumer behaviour and use of our website. In particular, these tools enable us to deliver cookies, count visits and understand usage and campaign effectiveness. This data helps us to stay connected and relevant to our customers.

If you do not wish to receive any cookies you may set your browser to refuse cookies. However, this will mean that we will not be able to personalise your website each time you visit.

#### **4. Why we collect and hold personal information**

Generally, we collect, hold and use personal information about our customers to provide them with a range of products, services and benefits. This includes, collecting and using your personal information to complete your rental booking; to provide you services in connection with your rental; for example navigation assistance or an E-Toll Tag, to provide you customer service assistance and to process fees and charges connected to your rental account.

We also collect personal information to assist in identifying ways in which we can serve you better, such as providing our products and services to you more effectively. We also collect and use your personal information to assist our internal administration and operations including accounting, risk management, record keeping, archiving, systems development and testing, and staff training.

Some of the information we collect is for the purpose of improving our interaction with customers, suppliers, business partners and contractors and their involvement with Bargain Car Rentals. We collect personal information about third parties for purposes in relation to your and their dealings (either directly or indirectly) with Bargain Car Rentals.

Customers who provide personal information about a third party individual need to ensure that those persons are aware of this Privacy Policy, understand it and agree to accept it. If that

individual does not have the capacity to understand and agree to these terms, Bargain Car Rentals requires a parent or guardian to give the assurances set out in this paragraph.

## **5. How we collect information**

Generally, we collect personal information directly from you, such as when you make a reservation or request a product or service, in the course of providing you with that product or service, or when you have other dealings with us.

We may collect and update that information over the phone, over the Internet, in person (when you visit us at a Bargain Car Rentals Depot), when you write to us or if you participate in our marketing campaigns. We may also collect personal information through third parties such as:

- Our business partners who provide customer benefits;
- Our service providers;

## **6. Storage and protection of personal information**

We store personal information in a combination of secure computer storage facilities and paper-based files and other records. In so doing, we have taken numerous steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally we take reasonable steps to destroy or permanently de-identify personal information when we no longer need it.

## **7. How we use and disclose personal information**

We may use and disclose your personal information for a variety of purposes in connection with servicing you as a customer of Bargain Car Rentals and in relation to our business operations. These include:

- Processing and administering your dealings with us as a customer, supplier or contractor;
- Providing you with the products and services you have requested from us;
- Developing processes, products, services and benefits to better meet your needs; and
- Disclosing your information for use by relevant parties in connection with our services, such as Roads & Maritime Services and E-Toll in relation to your use of an E-Toll Tag.

We may also use your personal information to offer or provide you with loyalty benefits, discounts or other information about such schemes that may be operated by us or third parties. This includes:

- Obtaining details about how you acquire and use our products, services and benefits; and
- Rewarding customers for utilising our products and services through mechanisms such as discounts, special pricing offers and prizes.

- We may provide your personal information to our agents, franchisees, contractors, business partners or related companies for the purposes of, or in connection, with the supply of products and services to you and for the same purposes above.

## **8. Direct marketing**

We collect personal information so that we can provide our customers with useful and relevant information about our products and services. Generally, we collect this information directly from you. In some circumstances, however, we may collect personal information from third parties, including from our service providers and social media platforms such as Facebook. We use the information we, or our service providers, collect to assist us to determine how we can best engage with our customers about our products and services. To this end, we, or our service providers, may collect information about your social media preferences and activities so that we can engage with our customers on social media sites. We may also collect certain demographic information and behavioural information from social media platforms to better serve consumers with more targeted advertising. If we do not collect this information in the ways described above, we may not be able to let you know about our products and services in the most effective way.

We may use and disclose the information we collect for the purpose of providing you with tailored marketing communications about our goods and services, or to conduct market research. Typically, we send these communications to your email address or mailing address. Occasionally, we may also send marketing communications to your social media accounts, including, for example, your Facebook account.

## **9. Opting Out of Direct Marketing**

If you do not wish to receive direct marketing information from Bargain Car Rentals, please use the contact details below to opt-out or use the unsubscribe feature on our electronic marketing communications. Please note that if you make such a request:

We may still need to use your personal information to provide you with the services and products you have requested as a customer; and

It may not be possible for us to immediately action a request to cease receiving any or all direct marketing material. However, we will respond to such requests as soon as practicable and will make all reasonable efforts to promptly action your request to opt out of receiving future direct marketing material.

We will not sell or rent your personal information without your consent. We may disclose your personal information where we are required or authorised by law to disclose your personal information or for any purposes connected to a fraud, crime prevention or impropriety investigation.

## **10. Overseas disclosure of personal information**

Bargain Car Rentals may be required to disclose some of your personal information, for the purposes described above, to organisations outside Australia.

Personal information provided to organisations outside Australia may not have the same protection as set out in this privacy policy and the Australian Privacy Principles. Bargain Car Rentals will endeavour where possible to ensure these protections are met, but is unable to guarantee as such.

### **11. Access to, and correction of, personal information**

We will take reasonable steps to make sure that the personal information we collect, hold, use or disclose is accurate, complete and up to date. If your personal details change, such as your address or phone number, please contact us on (03) 6165 0911 or [customer@bargaincarrentals.com.au](mailto:customer@bargaincarrentals.com.au) to update your details.

Following a request, we will provide you with a copy of any personal information which we hold about you in accordance with our obligations under the Privacy Act. We may charge a fee for retrieving this information, in which case we will inform you of the fee in advance of providing the information.

In the first instance, we will ask you to provide some of identification, such as your driver's licence, to ensure that you have the right to access the information

### **12. Making a complaint**

If you wish to complain about our handling of your personal information, please send a written complaint to the Privacy Officer in the first instance by using the contact details below. We undertake to promptly acknowledge and investigate any complaint about the way we manage personal information. If you are dissatisfied with the outcome of our investigation, you may take your privacy complaint to the Office of the Australian Information Commissioner (OAIC). For information in making a complaint to the OAIC, please visit the OAIC's website <http://www.oaic.gov.au>, or phone 1300 363 992, or mail GPO Box 5218 Sydney, NSW, 2001.

### **13. Contacting us**

If you have any questions about this Privacy Policy, if you wish to update information we hold about you or if you wish to make a complaint about the way we manage personal information, please write to:

The Privacy Officer

Bargain Car Rentals Australia Pty Ltd

171-175 Harrington St

Hobart TAS 7000

You can also telephone us on (03) 6165 0911 or email our Privacy Officer at [Customer@bargaincarrentals.com.au](mailto:Customer@bargaincarrentals.com.au).