



Drive Network Privacy Policy

This policy sets out:

- what is considered personal information;
- what personal information we collect and hold;
- how we collect, hold, use or disclose personal information;
- the purposes for which we collect personal information;
- what happens if we are not able to collect personal information;
- how to seek access to and correct your personal information;
- whether we disclose personal information outside Australia; and
- how to contact us.

We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (subject to exemptions that apply to us under that Act). However, due to the nature of some of our business activities, from time to time, we will handle personal information relying on the media exemption in the Act where appropriate. Where we do so, we will ensure that we comply with the Australian Press Council Privacy Standards. We may also rely on related bodies corporate, employee records and other exemptions in the Act. If you require more information on the collection and use of personal information in the course of journalism, please visit the Australian Press Council Privacy Standards at www.presscouncil.org.au/privacy-principles.

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recent updated policy. Your privacy matters to us, so whether you are new to 112 PTY LTD or are a long time user, please take the time to get to know our practices.

What is Personal Information

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, postcode and contact details (including phone numbers and email addresses) and possibly financial information, such as intended borrow amount when making a finance enquiry. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What Personal Information Do We Collect and Hold

We may collect the following types of personal information;

- name;
- email address;
- telephone number;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives or otherwise;
- information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

Cookies

In some cases we may also collect your personal information through the use of cookies and other tracking devices. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website, without bothering you with a request to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

How We Collect Personal Information

We collect your personal information directly from you unless it is unreasonable or impractical to do so. We do this in ways including:

- through your access and use of our website, apps or sending SMS or making calls via our click to call features;
- through someone else who has provided us with your information (e.g. a gift subscription, or Live Chat lead creation);
- during conversations between you and our representatives; and
- when you complete an enquiry.

We may also collect personal information from third parties including:

- advertisers;
- mailing lists;
- recruitment agencies;
- contractors and business partners.

Why Do We Collect, Hold, Use and Disclose Personal Information

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide best possible quality of customer experience. We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you;
- to provide you with news, information or advice about our existing and new products and services;
- to communicate with you, including but not limited to, by email, mail, SMS or telephone;
- to manage and enhance our products and services;
- to personalise and customise your experience;
- to provide you with access to protected areas of our websites;
- to conduct competitions or promotions on behalf The Drive Network and selected third parties;
- to verify your identity;
- to provide as part of business data to third parties if you have authorised us to do so;
- to conduct business processing functions for operation of our websites or our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- to provide your updated personal information to us, our contractors or external service providers;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

What Happens if We can't Collect Your Personal Information

If you do not provide us with the personal information described in this policy, some or all of the following may happen:

- we may not be able to provide you with the products or services you requested, either to the same standard, or at all (for example, if you do not register as a member of a website, you will not be able to access features or services that are reserved for members only);
- we may not be able to provide you with information about products and services that you may want, including information about discounts sales or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

How Do We Disclose Your Personal Information

We may disclose your personal information to:

- our employees, related bodies corporate, partnerships, joint venture entities, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, mailing houses, newsagents, couriers, payment processors, photographic analysers, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;
- our existing or potential agents and/or business partners;
- our sponsors, or promoters of any competition that we conduct or promote via our services;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Privacy Act).

Direct Marketing Materials

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link), or by updating your personal details on our "Dnet Members" webpage. We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purpose of direct marketing unless expressly authorised by you.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

Accessing and Correcting Your Personal Information

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try and provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Members of our websites will generally be able to access and update their membership details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

How You can Complain about a Breach of Privacy

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please, contact us using the contact information below and provide details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with privacy breaches. Once the Privacy Officer receives a complaint, whether it is in writing or verbal means, the Privacy Officer will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavour to determine the nature of the breach and how it occurred. We may contact you during the process to seek further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. Our representatives will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer

112 Pty Ltd

Post: 3 Errol PI

North Melbourne VIC 3756

Tel: 03 3839 65754

Email: privacy@drivenetwork.com.au

Disclosure of Personal Information Outside Australia

We may disclose personal information to our related bodies corporate, partnerships, joint venture entities and external service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- our related bodies corporate partnerships and joint venture entities, located in New Zealand and South East Asia;
- our data hosting and Cloud-based IT service providers;
- other external service providers located in the Philippines and U.S.; and
- other third parties operating in jurisdictions including China, India, Indonesia, New Zealand, Hong Kong and the United States where you have authorised us to do so.

Security

We will take all reasonable steps to protect the personal information that we hold from misuse, loss or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Tracking and Targeting

112 PTY LTD (ABN 19 605 457 047) and its related bodies corporate, partnerships and joint venture entities (we, us or our) collect data about your browsing activity on our network. We may also use non-personal information that we collect about you on our network to identify you on third party websites where we have an arrangement in place to serve ads on those third party websites. We may also collect anonymous internet usage data from third parties.

One of the reasons we collect usage data is to display targeted advertisements or content on our network and also on third party websites. For that purpose, usage data is collected and assigned to one or more pre-defined categories (for example "holiday seekers"). If this infers a particular interest, a cookie is placed in your web browser which may determine the type of targeted advertising or content that you receive. We target advertisements and content in order to improve your user experience - so that you are served advertisements and content that we believe may be more relevant or useful to you.

To create consumer profiles, we also collate data from other sources across our network including memberships, surveys and competitions. We will only use this data in accordance with the Privacy Act 1988 (Cth), our Privacy Policy and other applicable laws.

Advertisements or content may also be "targeted" to users based on:

- the type of content displayed on a given web page;
- the geographical location of a user (ie. identified by an IP address);
- specific searches undertaken by a user; or
- the type of customer (e.g. member versus subscriber).

Other reasons we may collect anonymous usage data include:

- to limit the number of times users are served certain ads;
- to monitor the performance of advertising campaigns;
- to audit, research, and analyse usage in order to maintain and improve our services, and to develop new services;
- to ensure that our ad-serving technologies function properly; and
- to provide you with recommendations, based on your usage patterns.

We will not collect usage data or target advertisements based on the following market segments:

- racial or ethnic origin; or
- political opinions; or
- membership of a political association; or
- religious beliefs or affiliations; or
- philosophical beliefs; or

- membership of a professional or trade association; or
- membership of a trade union; or
- sexual preferences or practices; or
- criminal record; or
- health information; or
- genetic information that is not otherwise health information.

If we ever seek to target advertisements based on the above market segments, we will first obtain your express consent.

We will not create categories designed to target children under the age of 13 years (however, this does not prevent us from marketing children's products to an adult audience).

Third party advertisers purchase advertising products from us that enable them to target particular types of users of our network, for advertisements served both on our network and also on third party websites.

We also permit advertisers to embed their own cookies in advertisements and we allow other third parties to use cookies and other tracking technologies on our websites. Generally, advertisers will embed cookies in advertisements to monitor the performance of their advertising campaign, but they may also collect anonymous usage data relating to browsing activity on our network. We encourage advertisers to have a privacy policy that outlines their data collection activities and usage. Please refer to such third party privacy policies for more information.

We will not provide any personal information to an advertiser or any other third party without your express consent or in accordance with our Privacy Policy. However, to the extent that anonymous user data does not constitute personal information, we are entitled to deal with that information in any manner we see fit.

Changes to Our Privacy Policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated in April 2018.

Our properties may feature Nielsen proprietary measurement software, which will allow you to contribute to market research, like Digital Content Ratings. To learn more about the information that Nielsen software may collect and your choices with regard to it, please see the Nielsen Digital Measurement Privacy Policy at <http://www.nielsen.com/digitalprivacy>