Important Privacy Notice

This Privacy Notice contains important information about **our** collection, use and disclosure of **your** personal information. It also outlines **your** privacy rights under the *Privacy Act 1988* (Cth) (**Privacy Act**).

Please read this Privacy Notice carefully before submitting **your** Application for a Novated Lease. By electronically accepting this Privacy Notice, **you** consent to **us**, **our** related bodies corporate, affiliates and agents collecting, using, holding and disclosing **your** personal information (including credit-related information) about **you**.

You can find out more about how **we** deal with **your** privacy by viewing **our** Privacy & Credit Reporting Policy at: https://www.customfleet.com.au/privacy-and-credit-reporting-policy

If you do not consent to us collecting, using, holding and disclosing your information in accordance with this **Privacy Notice**, or you do not provide us with your information, **we may not be able** to process your **Application for a Novated Lease or** provide services to you**,** or establish, administer or (where applicable) provide a lease facility and management services or benefits associated with them.

We may disclose your information to a third party, including a credit reporting body (CRB), in a form that may enable the third party to identify you. If we obtain a credit report about you, that information may be recorded and affect your credit standing.

If **you** have any questions or concerns about how **we** handle **your** information, please contact **us** at: privacy@customfleet.com.au

Further contact details, including **our** address, can be found in the Contact us section of our website (https://www.customfleet.com.au/contact-us)

Custom Fleet entities

The Custom Fleet entities (referred to as "**we**", "**us**" and "**our**" in this Privacy Notice) are Custom Service Leasing Pty Ltd ABN 60 073 245 084, Custom Fleet Pty Ltd ABN 69 005 093 701, Element Fleet Services Australia Pty Ltd ABN 14 119 426 612, Element Financial (Australia) Pty Ltd ABN 14 119 426 612 and EFN (Australia) Pty Ltd ABN 90 607 344 650.

Personal information

In this Privacy Notice, references to "personal information" include:

- any information which may identify **you**, such as **your** name, date of birth, address, identification documents and employment information. If **you** use **our** website or mobile applications, **we** may collect information that relates to **your** location or activity, including IP address, use of third-party sites and other user information
- "**credit information**", such as **your** identity; the type, terms and maximum amount of credit provided to **you**, including when that credit was provided and repaid; repayment history information; payment information; and consumer credit liability information, including defaults of past and present lease and other credit facilities and applications
- "**credit eligibility information**", which is credit reporting information supplied to **us** by a CRB and any information **we** derive from it.

We refer to credit information and credit eligibility information collectively as "**credit-related information**".

Why we need to collect your personal information

We collect your personal information for the primary purpose of assessing your Application for a Novated Lease and, if approved, establishing, administering and managing your novated lease arrangement. We need this information to:

- verify **your** identity
- report to CRBs so that they can conduct credit checks, provide credit reports and assist **us** in assessing **your** creditworthiness
- establish and administer any credit-related insurance product (including, if applicable, assessing an application for insurance)
- determine whether to approve **you** for any other requested products or services
- manage **our** business relationship with **you**.

We may also use or disclose personal information collected about you for related secondary purposes, including to:

- undertake risk assessment modelling to evaluate the financial and operational risks associated with establishing and managing **your** novated lease, including verifying information, preventing fraud and ensuring the arrangement remains appropriate and compliant
- carry out administrative and operational functions in connection with the lease facility and related management services, including delivering customer service and support
- promote and provide benefits associated with the lease facility and related management services
- conduct direct marketing and send **you** electronic marketing communications where permitted by law
- maintain and improve **our** products, services, customer experience and operational processes, such as through data analytics to assess performance, inform product planning, and support research and development.
- comply with laws that may require or authorise **us** to collect, hold, use and disclose personal information about **you**, such as the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), the *Personal Property Securities Act 2009* (Cth) and other legislation (for example, taxation laws)
- carry out other purposes as contemplated in **our** Privacy & Credit Reporting Policy.

We may collect your information from you directly, or indirectly through third parties (such as your fleet manager or employer).

Access to information relating to your privacy

You may gain access to the information **we** hold about **you** or obtain a copy of **our** Privacy & Credit Reporting Policy at https://www.customfleet.com.au/privacy-and-credit-reporting-policy or by contacting **us** at privacy@customfleet.com.au

Our Privacy & Credit Reporting Policy and the privacy policies of the insurers, CRBs and other third parties **we** deal with contain information about how **you** may access or seek correction of **your** information, how that information is managed, how to make a privacy-related complaint, and how that complaint will be dealt with.

Exchange information with CRBs

We may give information about **you** to, and receive information about **you** from, CRBs, including information about **your** creditworthiness. **We** will obtain **your** consent to disclose **your** information to CRBs. The information **we** disclose to CRBs may be used by **us**, and CRBs, to assess **your** creditworthiness, including calculation of a credit score or credit rating. **Our** disclosure of **your** information to CRBs may affect **your** credit score or credit rating calculated by a CRB. Creditworthiness can be negatively impacted when a credit provider requests access to **your** credit information.

CRBs may include information about **you** and **your** application in reports provided to other credit providers to assist them to assess **your** creditworthiness. **We** may inform CRBs if **you** default, fail to meet **your** repayment obligations or commit a serious credit infringement. **You** can ask a CRB not to use a credit report about **you** for the purposes of pre-screening or direct marketing. **You** can also ask a CRB not to use or disclose credit reporting information about you, and to notify you of any requests for credit information, if **you** have reasonable grounds to believe that you have been, or are likely to be, a victim of fraud.

The CRBs **we** may currently share information with are:

- Equifax Pty Ltd ACN 080 662 568 (Australia) – www.equifax.com.au – contact on **13 83 32**; see privacy policy at www.equifax.com.au/privacy
- Equifax New Zealand Information Services and Solutions Limited NZBN 9429039517487 (New Zealand) –www.equifax.co.nz/– contact on **0800 698 332**; see privacy policy at www.equifax.co.nz/privacy

Please refer to our Privacy & Credit Reporting Policy for more information on **our** information sharing arrangements with CRBs.

Exchange information with other businesses

We may give or receive information about **you** to the following types of businesses, some of which may be located overseas:

- manufacturers, distributors and/ or suppliers of goods in connection with **your** lease facility or related management services
- other financiers or credit providers
- insurers who provide insurance in relation to the lease facility
- service providers such as customer service organisations, repairers, IT service providers, fuel card and other payment products, telematics providers, mobile and telecommunication providers, call centres, mailing houses, researchers, collections agents, asset disposal service providers, property valuers, data analysts, professional advisers, auditors, delivery companies, mailing organisations and other people who assist **us** to provide **our** products or services
- any person who represents **you**, including **your** financial consultants, accountants, lawyers, persons holding power of attorney, guardians and advisers
- industry bodies, government authorities, tribunals or courts
- investors, advisers, trustees, ratings agencies and other businesses assisting **us** with funding
- any person where **we** are authorised or required to do so by law
- insurers, valuers and debt collection agencies
- any of **our** related entities or associates in Australia and overseas
- any person to whom **you** expressly consent, or authorise, us to share information with
- organisations through whom **you** choose to make payments to us
- **our** agents, contractors or services providers that **we** engage to carry out our functions and activities
- **your** referees and **your** employer
- an organisation that assists **us** to identify, prevent or investigate any fraud, unlawful activity or misconduct (or suspected fraud, unlawful activity or misconduct)
- any person considering acquiring an interest in **our** business or assets
- associated businesses that may want to market products to **you**.

Customer identification

We may disclose **your** name, residential address and date of birth to a CRB or other organisation (including the document issuer or official records holder) to verify **your** identity. That organisation will use this information to give **us** an assessment/ report of whether or not the information **we** have

matches information held by the organisation and may involve use of third-party systems and services. If **we** use these methods and are unable to verify **your** identity in this way, **we** will let you know.

We may also use information contained in **your** identification documents, such as **your** passport or driver license, and match those details with the relevant registries using third party systems and record the results of that matching. In doing so, **we** may use the Australian Government's Document Verification Service (**DVS**) to verify **your** identity. The information **you** provide to **us** in **your** identification documents will be used to verify **your** identity and may be the subject of an information match request to the official record holder of the underlying information. That information match request, the information match result and other information match data and access to and use of the DVS may involve the use of third-party systems and services. This information may be transmitted between Australia and New Zealand. The DVS does not store **your** personal information.

Further information on the DVS is provided at: https://www.idmatch.gov.au/resources/identity-verification-services-privacy-statement

If **you** do not consent to **us** disclosing **your** information in this way, **we** will verify **your** identity in another way, which may involve requiring **you** to provide various supporting identification documents (either original or certified copies).

Overseas disclosure

We and the businesses **we** disclose your information to may disclose this information to businesses located overseas, such as in New Zealand, the United States, Canada, Israel, Mexico and India.

Overseas entities may be required to disclose this information to relevant foreign authorities under a foreign law. While **we** attempt to select and secure reputable offshore service providers, **we** are not liable for any breach or misuse of information sent offshore. An overseas entity may not be subject to privacy laws or principles similar to those that apply domestically. Any information disclosed to an overseas entity may not have the same protection as under domestic privacy laws.

If **you** consent to the disclosure of **your** personal information as notified above, **you** acknowledge that **you** may not be able to seek redress for any breach of **your** privacy which occurs overseas. If **we** disclose **your** credit-related information to entities that are located overseas, **we** will take reasonable steps to ensure that the overseas entity does not breach the Australian Privacy Principles in relation to **your** credit-related information.

Marketing

We and **our** related companies, joint venture parties, agents and contractors may use **your** personal information to tell **you** of promotions, products or services that have been made available and may be of interest to **you**. If **you** do not wish to receive any direct marketing communications, **you** can submit an opt-out request in writing to **our** Privacy Officer at: privacy@customfleet.com.au