

PRIVACY POLICY

The collection and use of both personal information and credit-related information is crucial the function of Alpha's business on a daily basis. As such, it is important that Alpha employees are compliant at all times with the Privacy Act 1988 (Cth), which includes the Privacy (Credit Reporting) Code 2014, when dealing with this information.

Why Alpha collects personal information?

Alpha collects personal information about You for the purpose of providing services to You or someone else You know; assessing Your creditworthiness and the creditworthiness of related individuals; obtaining credit-reporting and creditworthiness information about You from credit-reporting bodies (CRBs) or other credit providers; providing You with promotional material and information; facilitating its internal business operations; analysing Alpha's services and customer needs and because Alpha is required or permitted by any law.

What kinds of personal information does Alpha collect?

Alpha only collects personal information which is reasonably necessary to the function of its business. This includes, but is not limited to, the following information:

- Name;
- Address;
- Contact telephone number(s);
- E-mail address;
- Date of birth;
- Driver's licence number;
- Car preference;
- Credit card or bank account numbers;
- Employment information;
- Residential information;
- Identification documents such as a driver's licence or 18+ card or similar.
- Credit history; and
- Other financial details.

Note: The personal information collected from customers will vary depending on the product they have enquired about or chosen. If the personal information provided to Alpha is incomplete or inaccurate, Alpha may not be able to provide the customer with the services they are seeking.

Note: Government related identifiers are identification numbers such as Tax File Numbers (TFN) or Medicare Numbers. We do not use government related identifiers

to identify you or the personal information we may have collected from you, other than as permitted by the Privacy Act.

Note: Where it is lawful and practicable to do so, it is permissible for an Alpha customer to remain anonymous or use a name other than their own (a "pseudonym") when inquiring about one of Alpha's products. However, this is NOT the case where you wish to hire or lease a vehicle from Alpha, or otherwise purchase a product, as Alpha will need to be able to identify you.

How does Alpha collect personal information?

Personal information of this nature may be collected by Alpha Companies in a number of ways including:

- by using written forms;
- through contact over the telephone, your mobile or other messaging technology;
- via the internet (including email); and
- in person.

This collection will occur during one of the following scenarios:

- Where a customer applies, registers or enquires about a product or service which Alpha offers;
- Where a customer provides Alpha with feedback or a formal complaint;
- Where a customer visits one of Alpha's websites;
- Where a customer talks to an Alpha representative, or otherwise does business with Alpha; and
- Where a customer makes a transaction in connection with credit, such as making payments to Alpha.

Third-Party Disclosures

In order to provide services to customers, Alpha may disclose Your personal information from time to time to:

- Alpha's employees, contractors, and related and affiliated entities for the purpose of providing Alpha's services, operating Alpha's business, and fulfilling requests by the customer;
- service providers who assist Alpha in operating its business and services. Such personal information will only be used to the extent necessary to perform the services;
- Alpha's related entities and other organisations with whom Alpha has affiliations so that those organisations may provide the customer with information about services and various promotions;
- CRBs such as Illion and Equifax, and debt collection agents;

- Third-parties to whom the customer has agreed Alpha may disclose the customer's information;
- the police, any relevant government authority or enforcement body, for example, if Alpha has reason to suspect that You have committed a breach of the Agreement, or have otherwise been engaged in any unlawful activity during the Rental Period, and Alpha reasonably believes that disclosure is necessary;
- third parties where required by law, binding regulation or court order; and
- a proposed or actual purchaser/newly controlling entity of a sale and/or transfer of control of all or part of Alpha's business, where Your personal information is relevant to any part of the business for sale and/or transfer.

Overseas Disclosures

Alpha is assisted by a variety of external service providers to deliver its services, some of whom may be located overseas. These third parties are too numerous to list, and they change from time to time. Some examples of the types of third-parties include:

- technology service providers including:
 - website analytics providers such as Google located in the US;
 - cloud service providers such as Marketo located in the US; and
 - hosting service providers such as Microsoft Dynamics and Flow located in Australia;
- developers, IT system administrators, and support staff, located in the Philippines. While Alpha's developers and support staff rarely access live data, they may do so when troubleshooting complex support requests or bugs, or designing new functionality; and
- promotion or marketing service providers, such as Mail Chimp located in Australia.

You consent to this overseas disclosure and agree that by providing that consent, APP 8.1 under the Privacy Act 1988 (Cth) no longer applies. APP 8.1 requires entities to take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs in relation to the information.

We are likely to disclose credit-related information or credit-eligibility information to our support staff located in the Philippines, and as otherwise permitted by law.

How does Alpha hold and secure personal information?

Alpha stores information in different ways, including in physical and electronic form. The security of this information is of the highest importance to Alpha. As such, Alpha will take steps to protect it from misuse,

interference, loss, unauthorised access, modification or unlawful disclosure. Alpha protects its customers information by enforcing:

- confidentiality requirements for our employees;
- security measures for access to our systems;
- only giving access to credit information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites and servers.

We may from time to time store credit information physically or electronically with third party data storage providers. Where we do this, Alpha will use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the third-parties use of the information.

Note: Alpha may be compelled by law to retain a customer's personal information for a period of time after the customer has ceased their relationship with us (e.g. Contracts must be kept for a period). After such time has passed, or where Alpha determines that the information is no longer needed, Alpha will destroy or de-identify the customers personal information.

If a data breach involving your information occurs, or we suspect that a data breach has occurred, whether the entity experiencing the data breach is the Alpha Group or third parties we use, such as contractors or subcontractors, we will expeditiously conduct an investigation and assessment.

Based on this assessment, we will determine whether any steps need to be taken by us to ensure your information is not accessed by unauthorised persons or whether we need to notify you with recommendations about the steps that you should take in response to the data breach.

If there is a serious data breach, we will tell you about any action we have taken, or we are intending to take, to prevent reoccurrence.

GPS Tracking and Immobilisation

The Company may use GPS tracking or other electronic tools ('GPS Devices') to enable the Company to track the geographical location of its vehicles. By hiring an Alpha Hire Vehicle, You expressly consent to the Company using a GPS Device on the vehicle during the Rental Period where the Company sees fit. This will result in the Company using and retaining information from the GPS Device from time to time.

The Company may, where You are in breach of Your Agreement, and after considering any and all legislative

requirements, use the installed GPS Device to immobilise the Vehicle. By hiring an or leasing an Alpha Vehicle, You expressly consent to this.

Access and correction to personal information

Alpha's customers may request access to the information we hold about them. Alpha's customers may also request that corrections to the information are made. In order to do this, the customer must contact Alpha by way of one of the following methods:

- By Telephone: 1300 257 426
- By Fax: 07 3868 2601
- By email: feedback@alphacompanies.com.au
- By Post: GPO Box 1185, Brisbane, QLD 4001

Note: There are circumstances where Alpha is **not** required by law to provide access to personal information, or make corrections. For instance, where it is unlawful to do so. Where you are not given the requisite access, or corrections are not made, justification will be given for why this has occurred.

There is no fee associated with an Alpha customer requesting access to information, or a correction to their information.

Note: Alpha will need to verify the customer's identity before giving the customer access. Alpha will make efforts to provide the information requested within 30 days of receiving the customer's request.

How can an Alpha customer make a complaint?

Where an Alpha customer believes that Alpha has failed to comply with the Privacy Act 1988 (Cth), the Credit Reporting Privacy Code or one or more of the Australian Privacy Principles the customer may make a complaint and begin the Internal Dispute Resolution (IDR) process. Alpha takes all complaints seriously, and will aim to resolve all complaints in a timely and efficient manner. To make an internal complaint to Alpha, one of the following methods may be used:

- In Person: by visiting an Alpha Branch
- By Telephone: 1300 257 426
- By Fax: 07 3868 2601
- By email: feedback@alphacompanies.com.au
- By Post: GPO Box 1185, Brisbane, QLD 4001

Alpha will make efforts to resolve all complaints within 15 business days of receipt of the complaint (you will receive communications during this time, including a final determination). If an issue has not been resolved to your satisfaction, you can lodge a complaint with

the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

AFCA:

- Website: www.afca.org.au
- Email: info@afca.org.au
- Telephone: 1800 931 678 (free call)
- In Writing: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

Alternatively, you may refer the matter to the Office of the Australian Information Commissioner ('OAIC').

OAIC:

- By Post: GPO Box 2999, Canberra ACT 2601
- By Telephone: 1300 363 992
- By Fax: 02 9284 9666
- Website: www.oaic.gov.au

Important information about credit reporting

The Company's website includes important information about credit reporting available at <https://www.alphafinance.com.au/credit-reporting-policy/>. This includes details about the credit reporting bodies that the Company deals with, and the Company's statement of notifiable matters under the Credit Reporting Code. The statement contains information about credit reporting, the kinds of information that the Company may give to CRBs (such as about certain overdue payments), how they may handle it, and what happens if You fail to meet repayment obligations or commit a serious credit infringement. It also includes details about access, correction and complaint rights regarding credit-related personal information and rights to prevent the use of credit-related information in certain circumstances, such as to request CRBs not to use it for the purposes of pre-screening of direct marketing by a credit provider, or if You are a victim of identity fraud. A copy of this information is also available from the Company on request.

Keeping your information up-to-date

It is important to Alpha that the personal information we collect about customers is accurate, complete and up-to-date. As such, it is important that the customer keep Alpha informed in regards to any changes to their personal information. Alpha customer's can contact Alpha at any time (see above) in order to update their personal information.

Cookies

Alpha uses cookies and tracking software on its various websites to compile data that can help improve the content and functionality of our websites. This enables us to customise your experience when interacting with the Alpha Companies on our social media and digital platforms.

Trading Names

The Alpha Companies to which this policy applies are: Alpha Car Finance Pty Ltd (ABN 93 151 835 040) and AGLC Holdings Pty Ltd (ABN 24 115 911 683).

Last Updated

This document was updated and/or last released on 15/01/2020.