

# Privacy Policy



The Privacy Act 1988 (Cth) (Privacy Act) and Privacy (Credit Reporting) Code 2014 (CR Code) govern the way we manage your personal information and credit-related information. This Privacy Policy describes the personal information we collect and hold and how we deal with personal information. Our Credit Reporting Policy describes the credit-related information we collect and hold and how we deal with credit-related information and can be accessed at ([www.alphafinance.com.au/credit-reporting-policy/](http://www.alphafinance.com.au/credit-reporting-policy/)).

## Definitions

**Personal Information:** means information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also be deemed credit information.

**Credit Information:** means information which is used to assess your eligibility to be provided with finance and will generally include the type and amount of credit provided to you, repayment history information, default information (including overdue payments) and court information. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

## Policy

### Why Alpha collects personal information?

The personal information we collect and hold about you depends on your interaction with us. Generally, Alpha collects, uses and holds personal information about You if it is reasonably necessary for or directly related the performance of our functions and activities and for the purposes of:

- providing goods and services or information to You or someone else You know;
- facilitating its internal business operations, including:
  - fulfilment of any legal requirements;
  - establishing our relationship with you (including assessing Your creditworthiness and the creditworthiness of related individuals and processing applications);
  - maintaining and managing our relationship with you and communicating with you in the ordinary course of that relationship (including responding to enquiries, feedback or complaints);
  - analysing Alpha's services and customer needs with a view to developing new or improved goods and services;
  - contacting you to provide a testimonial for us; and
- providing You with promotional material and information about other goods and services that we and other organisations we have affiliations with, offer that may be of interest to you; and
- any other purpose required or permitted by any law.

Except as otherwise permitted by law, we only collect sensitive information about you if you consent to the collection of the information and if the information is reasonably necessary for the performance of our functions, as set out above.

### Failure to provide information

If the personal information provided to Alpha is incomplete or inaccurate, Alpha may not be able to provide you with the goods, services or information you are seeking.

Note: Where it is lawful and practicable to do so, it is permissible for you to remain anonymous or use a name other than your 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, apply for or obtain vehicle finance, or otherwise purchase a product or service from us, as Alpha will need to be able to identify you in those circumstances.

### What kinds of personal information does Alpha collect?

Alpha may collect personal information about you which is relevant to providing you with the products and services you are seeking and to the function of its business. The kinds of information Alpha collects from you depends on its relationship with you. Alpha interacts with individuals who purchase its products and services (customers), individuals who supply it with products and services (suppliers), users of Alpha’s website or social media channels and individuals seeking information about Alpha’s products and services (users), and employees, contractors, and job applicants. This policy relates to personal information collected from customers and users only.

The kinds of personal information we typically collect from customers includes:

- Name;
- Address;
- Contact telephone number(s);
- E-mail address;
- Date of birth;
- Driver’s licence number;
- Car preference (for vehicle rental services);
- location tracking (for vehicle rental services);
- Credit card or bank account numbers;
- Employment information;
- Residential information (i.e., whether you own or rent your property, and how long you have lived there);
- Identification documents such as a driver’s licence or 18+ card or similar;
- Credit-related information; and
- other personal information relevant to providing you with the goods and services you are, or someone else on your behalf is, seeking.

Note: The personal information collected from customers will vary depending on the product they have enquired about or chosen.

The kinds of personal information we typically collect from users includes information collected through the use of our website and digital platforms, including IP address, user preferences, 'cookie' information, and geographical location, names and contact details (where you volunteer this information), and any other personal information relevant to providing the information you are seeking.

### How does Alpha collect personal information?

Personal information will generally be collected by Alpha Companies directly from you in a number of ways including:

- by using written and online forms;
- through contact over the telephone or other messaging technology;
- via the internet (including email, social media accounts, and use of our online contact forms);
- when you sign up to receive our emails or other communications; and
- in person.

There may, however, be some instances where personal information will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. For example, where a third-party books a vehicle rental on your behalf. We will usually notify you about these in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Further information on circumstances where we collect credit-related information about you from third parties is set out in our Credit Reporting Policy.

### Internet users

Our website may contain links to other websites. We do not have any control over those websites. We are not responsible for or liable for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

### Disclosures

Generally, we only use and disclose personal information about you for the purposes for which it was collected (as set out above). 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 goods, services and information to you and facilitating our and their internal business operations;
- service providers who assist Alpha in operating its business and providing goods, services, and information to you (including payment processors, cloud data storage suppliers, information technology service providers, mail distribution service suppliers, or professional advisers such as lawyers, accountants, and auditors), and these third parties may not be required to comply with our privacy policy, although we take reasonable steps to ensure these service providers have appropriate security for your personal information;

- Alpha’s related entities and other organisations with whom Alpha has affiliations so that those organisations may provide you with information about services and various promotions; and
- CRBs such as Illion and Equifax, and debt collection agents (further information is set out in our Credit Reporting Policy) including:
  - Third-parties to whom you have agreed Alpha may disclose your information;
  - the police, any relevant government authority or enforcement body;
  - 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 DotDigital located in the US; and
  - vehicle condition report application providers such as We-Integrate located in New Zealand.
- 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.

We have taken reasonable steps to ensure these third parties have appropriate security for Your Personal Information.

### How does Alpha hold and secure personal information?

Alpha stores information in different ways, including in physical and electronic form. Alpha takes reasonable steps to ensure your information is stored safely 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;
- physical and electronic security measures for access to our systems and information;
- only giving access to personal information to a person who is authorised 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 personal information physically or electronically with third party data storage providers. Where we do this, Alpha will use reasonable steps (which generally includes contractual arrangements) to ensure those providers take appropriate measures to protect that information and use it only for the purposes for which they were provided 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 customer’s personal information.

## 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 vehicles it owns. By hiring an Alpha Car Finance Vehicle, you expressly consent to the Company using a GPS Device on the vehicle during the Rental or Lease Period where the Company sees fit. This will result in the Company using and retaining information from the GPS Device from time to time. If you do not consent, or you withdraw your consent, you will not be able to continue with your rental or lease services.

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 or leasing an Alpha Vehicle, you expressly consent to this.

## Access and correction to personal information

You may request access to the personal information we hold about you. We will respond to your request within a reasonable period. You may also request that corrections to the information are made if you believe the information we hold about you is inaccurate, incomplete or out of date. We will take reasonable steps to correct the information within 30 days (or another timeframe agreed with you in writing) so that it is accurate, complete, and up to date.

In order to request access or correction, you must contact Alpha by way of one of the following methods:

- **Telephone:** 1300 257 426
- **Fax:** 07 3868 2601
- **Email:** [feedback@alphacompanies.com.au](mailto:feedback@alphacompanies.com.au)
- **Post:** GPO Box 1185, Brisbane, QLD 4001

Note: There are circumstances where Alpha may decline a request 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 (unless it is unreasonable to provide the justification) and mechanisms available for making a complaint.

There is no fee associated with an Alpha customer requesting access to information, or a correction to their information, although we may charge a reasonable fee for processing the request.

Note: Alpha will need to verify your identity before giving you access to personal information or correcting personal information.

## How can an Alpha customer make a complaint?

If you have any queries or complaints about this Privacy Policy or the way we handle your personal information, or you wish to make a complaint about a breach of the Privacy Act, the CR Code or one or more of the Australian Privacy Principles, please contact us using the details above or in person by visiting an Alpha branch. Alpha takes all complaints seriously and will aim to resolve all complaints in a timely and efficient manner.

Alpha will make efforts to respond to all complaints within 15 business days of receipt of the complaint, or another timeframe agreed with you in writing (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](http://www.afca.org.au)
- **Email:** [info@afca.org.au](mailto:info@afca.org.au)
- **Telephone:** 1800 931 678 (free call)
- **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:**

- **Post:** GPO Box 2999, Canberra ACT 2601
- **Telephone:** 1300 363 992
- **Fax:** 02 9284 9666
- **Website:** [www.oaic.gov.au](http://www.oaic.gov.au)



**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 13/01/2021.