

# NORTHSIDE WINDSCREENS PRIVACY AND CREDIT INFORMATION MANAGEMENT POLICY

Automotive Assistance Services Pty Ltd operates under several business names including Northside Windscreens.

Automotive Assistance Services Pty Ltd trading as Northside Windscreens (**'We'**, **'Us'** or **'Northside Windscreens'**) collects, holds, uses and discloses your personal information in a number of ways. Northside Windscreens is bound by the *Privacy Act 1988* (Cth) (the **Act**) and the Australian Privacy Principles contained within the Act.

## Purpose

The purpose of this policy is to clearly outline the types, and circumstances, of personal information collected by us, and how we handle, use and disclose that personal information. It provides general information about how Northside Windscreens manages your personal information.

Northside Windscreens collects personal information from you, in order to identify you and provide products and services to you. To discuss the exact information we require for each product or service, please contact us on 1300 211 656 or visit a Northside Windscreens branch.

## Commitment

The protection of your privacy and confidentiality of your personal information is important to us.

If you choose not to provide us with the information that we have requested, in most cases, we will be unable to provide the product or service you have applied for, or administer a service you have already purchased. Where this arises, we will advise you why.

## Credit information

In addition to holding personal information, we may also hold "credit eligibility information" or "credit information" about a particular individual. If we hold any "credit eligibility information" or "credit information" (as defined below), it is protected as "credit related information" under this policy.

**"Credit eligibility information"** means information that has been obtained from a credit reporting body, or that has been derived from that information, that is about an individual's credit worthiness.

“**Credit information**” means personal information that includes the following:

- information about an individual, like their name and address, that we may use to identify that individual
- information about an individual’s current or terminated consumer credit accounts and an individual’s repayment history
- the type and amount of credit applied for in any previous consumer or commercial credit applications to any credit provider, where that credit provider has requested information
- information about an individual from a credit reporting body
- information about consumer credit payments overdue for at least 60 days and for which collection action has started
- advice that payments that were previously notified to a credit reporting body as overdue are no longer overdue
- information about new credit arrangements an individual may have made with a credit provider, in relation to consumer credit currently or previously held, to deal with any defaults or serious credit infringements by that individual
- information about court judgments which relate to credit that an individual has obtained or applied for
- information about an individual on the National Personal Insolvency Index
- publicly available information about an individual’s credit worthiness, and
- an opinion of a credit provider that an individual has committed a serious credit infringement of credit provided by that credit provider.

We may hold credit information in relation to individuals to whom we provide commercial credit (we do not provide consumer credit) as well as other individuals we deal with in connection with that credit (such as guarantors). We may not hold all of these kinds of credit related information about a particular individual.

## Questions, comments and complaints

If you have any questions or comments regarding your privacy in relation to Northside Windscreens, please contact us on 1300 211 656 or email us at [privacy@racq.com.au](mailto:privacy@racq.com.au)

If you believe that we have not fulfilled our obligations under the Privacy Act or you do not agree with a decision made by Northside Windscreens in relation to the access or update of your personal information, you can make a complaint to us by writing to us at:

Privacy Officer  
Group Risk & Compliance  
PO Box 4 Springwood QLD 4127  
email: [privacy@racq.com.au](mailto:privacy@racq.com.au)

Once we have received your complaint, we will investigate and endeavour to respond to you within 15 working days.

For complaints in respect of credit related information we will acknowledge its receipt in writing to you as soon as possible (and always within 7 days). Our written acknowledgement will set out how we propose to deal with the complaint.

We will endeavour to ensure that our investigation in relation to a complaint in relation to credit related information is completed and a decision communicated to you within 21 days of being advised of the complaint. We will inform you if we need more than 30 days, and we will seek your agreement for a reasonable extension.

If you are unhappy with the response from Northside Windscreens, you can direct your complaint to the Federal Privacy Commissioner at:

Office of the Australian Information Commissioner (OAIC)  
GPO Box 5218  
Sydney NSW 1042

Phone: 1300 363 992

TTY: 1800 620 241

email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)

## Changes to this policy

This policy was last updated on 1 December 2021. Northside Windscreens continuously reviews its privacy statement and procedures to keep up to date with relevant legislative and operating requirements. As a result, we may update and change this policy from time-to-time and the updated version will be published on our website. If you have a concern or query about this process and how it may affect you, please contact us at [privacy@racq.com.au](mailto:privacy@racq.com.au).

## Your consent

You consent to Northside Windscreens collecting, handling, using and disclosing your personal information in accordance with this policy, as it applies from time-to-time, and as permitted by any law.

From time-to-time we may require your consent to collect, handle, use, and disclose your personal information in order to continue to provide you the products or services you have requested or have already purchased. Your consent can be express or implied.

Express consent can be verbal or written.

Your implied consent is taken when Northside Windscreens can reasonably conclude by some action you take, or if you decide to take no action, for example when you call us and continue to speak to us after hearing that calls may be recorded or when you provide us with personal information that we have not specifically requested.

## Keeping your information safe

Northside Windscreens has policies and procedures that prescribe how we handle and store information, and to ensure that information is only accessed by people that have the authority and need to do so. Both physical (such as locks and security systems) and electronic (such as firewalls and access controls for computer systems) security mechanisms are in place and undergo routine review and testing.

Northside Windscreens will destroy personal information if it is no longer needed for the purposes for which we collected it, or for the purposes of meeting legal and regulatory requirements. Northside Windscreens will properly dispose of all paper files, correspondence and any other hardcopy documents. Electronic records will be appropriately deleted from systems.

## Types of personal information that we collect

We will only collect information from you that is reasonably necessary to undertake our business activities and functions. The types of information that we collect will depend on the products and services you have asked us to provide. Additionally, the types of information that we collect will depend on the means which you chose to communicate with us, such as e-mail, online, telephone or in person.

The types of personal information we may ask for include, but are not limited to, the following:

- your name, contact details, address and job location;
- vehicle details and registration;
- your history in regards to products and services

Northside Windscreens does not use any government identifiers (e.g. your drivers licence, tax file number, Medicare number) as your job number.

In relation to applications for commercial credit we may also collect the following types of information:

- your date of birth
- information about your financial position
- your employment details; and
- bank account information.

## Collection of personal information via online resources

When you engage with us through our online resources including, but not limited to websites and mobile applications 'apps'.

The types of personal information we may ask for include, but are not limited to:

- server or IP addresses;
- date and time of visit to our site;
- pages visited;
- documents downloaded;
- the site you visited prior to visiting our website;
- the browser that you are using to access our resources;
- if you have visited our website before; or
- tracking user preferences.

In addition to the above, mobile apps may collect location data, however, you will be notified if this is the case. Most of our online resources use sessions and/or cookies. The functionality of these resources will function if you disable these, however, you may be unable to access some functions if these are disabled.

## Types of sensitive information that we collect

Sensitive information, as defined by law, includes any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

We will always explain the purpose for collecting sensitive information.

## Third-party suppliers

Northside Windscreens also uses third party providers. Whilst we will only deal with reputable service providers, we recommend that you read the privacy statement of the third-party site if you are redirected.

## Unsolicited Personal Information

Unsolicited personal information includes personal information that Northside Windscreens has not requested or taken any active steps to receive.

Where we receive unsolicited personal information, we will determine whether we could have received the personal information under the Australian Privacy Principles. If we determine we could not have reasonably collected the personal information, we will as soon as practicable either destroy or de-identify the personal information, if lawful and reasonable to do so.

## How we collect your information

In most cases, we will only collect information from you directly, including written applications, face-to-face transactions in our branches or when you contact us via telephone or an electronic means such as the Internet or email.

If you wish to deal with us anonymously or by a pseudonym you must advise us and Northside Windscreens will assess whether both lawfully and practically we can comply with the request.

In relation to applications for commercial credit, we may also collect information from third parties, other credit providers and third party service providers including credit reporting bodies. Credit reporting bodies collect credit information about individuals which they provide as credit reports to credit providers and others in the credit industry to assist them in managing credit risk, collecting debts and other activities. You can also ask a credit reporting body, through contact details on their website, not to use or disclose your personal information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud.

We may refuse an application for credit made by you individually or with other applicants. Our refusal may be based on credit eligibility information obtained from a credit reporting body about either you, another applicant or another person proposed as guarantor. In that case, we will give you written notice that the application has been refused on the basis of that information. We will tell you the name and contact details of the relevant credit reporting body and other relevant information.

## When you provide us with personal information of a third party

When you provide us with the personal information of a third-party you warrant that you have notified that third-party that you will be providing the personal information to Northside Windscreens, and the purpose for which it is provided.

When you provide us with the personal information of a third-party we will only use, handle or disclose that personal information for the purposes for which it was provided.

## Using your information to provide you with requested products and services

We use the personal information we collect to provide services and products to you. In order to do this, we may need to disclose some of your personal information to other people or organisations. This may include, but is not limited to contractors, agents, our business partners or organisations that we have an alliance or arrangement with.

Further, we will share your personal information with all companies that form part of our corporate group. If one company within our corporate group collects your personal information, other entities within the corporate group may use and disclose your personal information for the purposes described in this policy.

We may also use personal information for other purposes where you would reasonably expect us to and the purpose is related to the purpose of collection, or where otherwise permitted by law.

## Using your information to market products and services to you

Northside Windscreens may use your personal information that we have collected to identify a product or service that may be of benefit to you and may contact you to let you know about these. Northside Windscreens may also disclose your personal information to our business partners or related entities to enable them to tell you about a relevant Northside Windscreens product or service.

If you do not wish to receive marketing contacts, you can contact us at any time and we will generally process your request within 10 business days of receipt.

We will not use credit information obtained in relation to credit application to market to you.

## Using your credit-related information

We may use your personal information (including credit-related information) for the purpose of providing products and services to you and managing our business. This may include:

- assessing and processing your application for a trade account with us
- establishing and providing our systems and processes to provide our products and services to you
- account administration
- executing your instructions
- charging, billing and auditing

- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- planning, product research and development
- other internal management functions and operations related to the provision or management of our products and services
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems, or
- direct marketing.

We may also disclose personal information to our business associates with whom we have alliances or arrangements from time to time, for the purpose of promoting their products and services, and to any mailing houses and agents used in administering direct marketing arrangements.

We never use sensitive information or credit information for direct marketing purposes.

In general, we do not use or disclose your personal information (including credit-related information) for a purpose other than:

- a purpose set out in this policy
- a purpose you would reasonably expect
- a purpose required or permitted by law, or
- a purpose otherwise disclosed to you to which you have consented.

## Disclosure of your information to third-parties

Personal information that we collect from you may be disclosed to:

- any entity to which we are required or authorised by or under law to disclose such information (for instance, law enforcement agencies and investigative agencies, courts, various other government bodies);
- other third-parties that you have consented to;
- our contractors, agents or business partners for purposes directly related to the purpose for which the personal information is collected, for example, other automotive service organisations should you require assistance outside of Queensland;
- our professional advisors and other contractors (for example IT consultants);
- external providers of services where you have engaged us to act as your agent; or
- insurers, insurance investigators and claims or insurance reference services, loss adjusters and reinsurers.

We may also disclose your credit related information to:

- credit reporting bodies (including disclosing that you are in default under a credit arrangement) or debt collecting agencies if you have not paid an amount as required;
- other credit providers to whom you have nominated us as a credit referee;
- guarantors nominated by you;
- any person necessary, in our view, to carry out an instruction you give us;
- your representative (for example, your lawyer or financial adviser) as authorised by you.

We may also disclose your personal information where otherwise permitted or required by law.

## Disclosure of your information to third parties overseas

Northside Windscreens may need to disclose your personal information to an overseas recipient.

You consent to Northside Windscreens making these disclosures as we deem necessary to administer and supply the requested services to you. Where we disclose your personal information to an overseas recipient we will take reasonable steps to include relevant obligations, aligned with the Australian privacy laws on how the recipient collects, uses, discloses, stores and retains your personal information.

Your personal information may be disclosed overseas for the following purposes:

- Where you have to have engaged us to act as your agent and the services you have requested us to provide require us to deal with overseas organisations.
- Where you communicate with us by e-mail, and when we communicate about you or our products and services.
- As required for the maintenance and sustainment of our systems and databases.
- As required for the maintenance and sustainment of our systems.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure. Where your information is disclosed overseas, it is likely to be one of the following countries:

- Austria
- Canada

- England
- Germany
- India
- Ireland
- New Zealand
- Sri Lanka
- Switzerland
- United Kingdom
- United States of America.

The above list is current as at 18 February 2021. It will change from time-to-time. Please ensure you check it regularly for changes.

## Accessing your personal information

If you request it, we will provide you a summary of any personal information held about you in accordance with our obligations under the *Privacy Act 1988* (Cth). If you request detailed information, Northside Windscreens may charge a fee for the retrieval of this information.

Any requests for information will be processed within a reasonable timeframe (usually within 15 business days). If the retrieval of information involves accessing archived information and will take longer than normal, we will endeavour to provide you with an estimated timeframe.

Under some circumstances, we may refuse you access to personal information where denying access is required or authorised by law, for example if access would pose a threat to life or the health of anyone, where the request for access is regarded as frivolous or vexatious, or where information relates to anticipated or legal proceedings. If you are denied access to your information, we will explain why.

## How we keep your information up to date

We will take reasonable steps to ensure that your personal information is accurate and up to date and we will correct this as soon as we know otherwise. You have the right to ask us to correct your information. If you learn that your information needs to be updated, you should contact us as soon as possible and we will process your request. If we refuse to correct your information, we will explain why in writing, and advise you of the mechanisms available to you to complain. You also have a right for a statement to be attached to your personal information if Northside Windscreens disagrees with your request to correct the information held.