

Privacy Policy

Version 26 August 2014

1. Background

1.1 General

Manheim Auctions Australia Pty Ltd (ABN 97 090 535 505) and its subsidiaries (**Manheim**) is Australia's largest provider of automotive auction and vehicle remarketing services. We are committed to protecting your privacy in accordance with applicable Australian privacy laws. Where Manheim's subsidiaries have extended requirements under the Australian privacy laws, these are provided in relation to the specific transactions by our subsidiaries.

Where a Manheim subsidiary collects your Personal Information from another Manheim subsidiary, it will have the same primary purpose for which it was collected originally.

The Policy describes the types of personal information we may collect about you, the purposes for which we use the information and the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy.

A copy of this Privacy Policy is available on the Manheim website at www.manheim.com.au/privacy-policy or you can request a copy by contacting our Privacy Officer.

1.2 What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

1.3 Employee records

Manheim is generally exempt from the Privacy Act when it collects and handles employee records and this Privacy Policy does not apply to that information. Where State or Territory health privacy legislation applies, we are required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

2. What we collect

2.1 General

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:

- **register to participate in a sale as a buyer:** the information we collect includes your name, address, telephone number/s, email address and photo ID (driver's licence, RTA/Government issued photo identification or passport, and bank account details for any reimbursement to you, we may also obtain details from your birth certificate) and your role and responsibilities if you represent a corporate client
- we will also collect the same details in relation to the person to be invoiced, if different to the above. If you choose to use our online sales system, we will also collect your credit card details and login. We will assign you a buyer number which you need to bid, and we will record details of any vehicle or other item you purchase
- **register to sell an item through us:** the information we collect includes your name, address, telephone number/s, email address, bank account details, driver's licence number or Dealer's Licence number and ABN (this is only relevant for personal details if you are a sole trader), details of the items you wish to sell (including details of any relevant finance arrangements, registration documents and service records) and, if applicable, your fax number, and remittance details
- **send us an enquiry or provide us with feedback:** we will collect your name, contact details, details of your enquiry or feedback and information about our response
- **apply for a job at Manheim:** we will collect the information you include in your job application, including your cover letter, resume, contact details and referee reports.

2.2 Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as health information. Manheim only collects sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by or under law (including applicable privacy legislation) to do so.

For example, we may collect your personal information as a director or principal of a company or business.

2.3 Collection of information other than personal information through our website

When you visit the Manheim website, some of the information that is collected about your visit is not personal information, as it does not reveal your identity.

Site visit information

For example, our web host provider may record and provide to us your server address, your top level domain name (for example, .com, .gov, .au, .nz etc), the date and time of your visit, the pages you visited, any documents you downloaded, the previous site you visited and the type of browser and operating system you used.

This information is used and disclosed by Manheim in anonymous, aggregated form only, for purposes including statistical analysis and to assist Manheim to improve the functionality and usability of the website. You are not individually identified, however Manheim reserves its right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

Cookies

Cookies are small text files that may be placed on your web browser when you visit our website or when you view advertisements we have placed on other websites. Cookies allow your browser to remember some specific information which the Web server can later retrieve and use. We do

not use cookies to store any personal information that could be read or understood by others. The cookies used by Manheim do not identify individual users, although they do identify the user's internet browser.

Cookies are used primarily for administrative purposes to improve your experience with our website. Manheim's website makes use of both session and persistent browser cookies, so that we can provide you as a registered user with a secure member's page by "authenticating you" when you sign in to our website and to make sure that they have agreed to our Terms and Conditions and Privacy Policy.

We may also use cookies to conduct research and perform statistical analytics to improve the website and our products and services. This is done anonymously and we do not analyse individuals' behaviour.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. However this will mean that you are unable to take full advantage of the website's features. For example, you will not be able to purchase vehicles online without logging into every individual page.

Online Behavioural Advertising (OBA) including data sharing settings

- Manheim uses advertising programs that place cookies on your computer to collect information about your browsing history (including on external websites). This information, which does not identify you personally, is collected in order to improve your online experience by customising the advertising you see to your interests including demographics, technology used, browser, location and language (**Interests**) plus displaying more relevant ads on external websites. We may review overall consumer behaviour for individuals or groups, and use search engine marketing on other websites. Any advertisements that may appear are not on your computer but are on a browser banner.
- The information obtained will not be combined with your Personal Information and is securely stored.
- Data is collected, processed and stored using third party analytics software that is secure and confidential. Analytical data is used to gain an understanding of user behaviour, perform system critical operations, and in extraordinary circumstances for legal reasons. Anonymous user data is shared between third party services in order to gain insight as to aggregate user behaviour.
- Analytic data insights are also used to target users through remarketing, demographics, interests and website behaviour. Third party vendors, including but not limited to Google, may show our ads on sites across the internet. We and third party vendors, including but not limited to Google, make use of third party cookies together in order to inform, optimise and serve ads based on past visits to a website. We make use of demographic data (such as age, gender and interests) obtained through third party tools in order to, but not limited to: influence marketing spend and communicate internally and externally the aggregate behaviour.
- We will not facilitate the merging of personally identifiable information with non personally identifiable information without prior user consent to that merger to optimise our website and website marketing; eg. we may collate personal information data and aggregate data for the purpose of comparing marketing costs with revenue on a transactional basis. Personally identifiable information is collected, processed and stored by Manheim where provided to us explicitly by registering manually or by sharing personal identifiable information by Facebook Connect or OpenID connection.
- If you require any further information on OBA, for your reference we have provided an OAIC Fact Sheet on OBA ([here](#)).
- If you require any clarification regarding OBA please contact the Manheim Privacy Officer.
- Opt outs

The opportunity to opt out of behavioural based digital advertising is available by visiting <http://www.youronlinechoices.com.au/opt-out>

If you wish to install an advertisement blocking program, an example is provided at:

<https://chrome.google.com/webstore/detail/adblock/ghghmmpiojbfepjocnamgkbbiglidom?hl=en>

If you wish to opt out of targeted digital marketing you can contact us by email at: marketing@manheim.com.au

2.4 Collection required or authorised by law

We may be required or authorised to collect personal information by or under an Australian law or a court/tribunal order including the following types of legislation applicable to the relevant State or Territory in relation to: Motor Vehicle Dealers, Consumer Law and Fair Trading, Unclaimed Money, Disposal of Uncollected Goods and Personal Property Securities.

3. How we collect personal information

3.1 Methods of collection

We collect personal information in a number of ways, including:

- in person (for example, when you attend an auction at our premises and register as a buyer)
- in person, when you purchase a vehicle from our motor dealer retail outlet and complete the relevant contract
- through the Manheim website (for example, if you register for an online account with us or complete and submit the online Contact Form)
- through the Manheim Facebook page, Twitter, SMS
- over the telephone
- from written correspondence (such as letters, faxes and emails)
- on hard copy forms (for example, competition entry forms and surveys)
- through surveillance cameras; and
- from third parties:
 - we may use various database providers for purposes such as, address validation software for personal information we maintain which will verify your personal information against such sources as Australia Post however this software provider will not access your data.
 - we may use other database providers for customer assistance such as a system that enables us to link you to the nearest Manheim site when you make an enquiry online.

4. Why we collect personal information

The main purposes for which we collect, hold, use and disclose personal information are set out below.

- identify who is selling items by auction sale, sale by tender or otherwise.
- identify who is buying at auction, sale by tender or otherwise.
- confirm whether any security interests are recorded in relation to item.
- receive payments from buyers and remitting funds to sellers and (where applicable) financiers.
- provide (or arranging for third parties to provide) additional products and services, such as vehicle inspections and valuations, transport and storage services, vehicle detailing and repair services, plant and equipment safety reports and financial, warranty and insurance products in respect of vehicles purchased from us.
- promote Manheim and its products and services, including through direct marketing, events and competitions.
- collect items from sellers and delivering them to buyers or other parties as instructed.
- provide storage services to repossession agents where the finance company provides the personal information.
- protect the security of our offices, staff, customers and the property held on our premises.
- answer queries and resolving complaints.
- recruit staff and contractors.
- general account management, planning and administration.

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are:

- required or authorised by or under law (including, without limitation, privacy legislation); and
- for which you have provided your consent.

4.1 Direct marketing

Where we have your express or implied consent, or where we are otherwise permitted by law, we may:

- send you information about upcoming auctions and other products and services, including retail sales, promotions, special offers and events
- disclose your personal information to third party providers of finance, insurance, warranty and other related products and services that we think may be of interest to you (where we have entered into an agreement with the third party allowing them to market to you). You may be contacted with this information in a variety of ways, including by mail, email, SMS, facsimile, telephone or other electronic means.

Opting out

Where you have consented to receiving marketing communications from us, that consent will remain current until you advise us otherwise.

However, you can opt out at any time by:

- contacting our Privacy Officer
- advising us if you receive a marketing call that you no longer wish to receive these calls
- using the unsubscribe facility that we include in our commercial electronic messages (such as emails and SMS) to opt out of receiving those messages.

To opt out of receiving marketing communications from third party providers, please make direct contact with those providers.

5. Who we may share your personal information with

We may share your personal information with third parties:

- if you sell an item through us, we may disclose your personal information to the buyer
- if you buy an item through us, we may disclose your information to the seller
- if you buy a vehicle from us we may provide your details to the dealer if required for warranty purposes
- information of buyers and sellers may be disclosed to third parties for purposes associated with the completion of the transaction (such as financial institutions for payment processing)
- third party providers of finance, insurance, warranty and other vehicle-related products and services with your consent
- the Personal Property Securities Register, to check whether any security interests are recorded in relation to an item provided to us for sale or auction as indicated in our Terms and Conditions for buyers and sellers
- that are providers of third party services that we commission on behalf of sellers, such as outsourced vehicle repairs and Plant & Equipment Safety Reports
- state and federal government authorities (for example for vehicle registration and compulsory third party insurance purposes, the Office of State Revenue for unclaimed money, ASIC in checking directors details for companies)
- referees whose details are provided to us by job applicants
- Manheim's contracted service providers, including:
 - delivery and transport providers
 - insurers
 - information technology and data storage providers
 - function and event organisers
 - marketing and communications agencies
 - research and statistical analysis providers
 - call centres
 - mail houses
 - external business advisers (such as recruitment advisors, auditors and lawyers).

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

Non affiliated companies that assist Manheim in providing services to you are required to maintain the confidentiality of such information to the extent that they receive it and to use your personal information only in the course of providing such services and only for the purposes that Manheim dictates.

6. Cross border disclosure of personal information

Manheim does not currently and is not likely to disclose personal information to third parties located overseas. If this changes in the future Manheim will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information and this Privacy Policy will be amended accordingly.

7. Data quality and security

7.1 General

Manheim limits access to your information to authorised Manheim employees or agents and our service providers are held to stringent standards of privacy. We also maintain physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorised access or disclosure. Some of our features of our information security program include:

- A dedicated information security group within the IT department that designs, implements and provides oversight to our information security program
- Use of specialised technology such as firewalls
- Testing of the security and operability of products and services before they are introduced to the internet, as well as ongoing scanning for publicly known vulnerabilities in the technology
- Internal and external reviews of our internet sites and services
- Monitoring our systems infrastructure to detect weaknesses and potential intrusions
- Implementing controls to identify, authenticate and authorise access to various systems or site
- Protecting information during transmission through various means
- Specific requirement for database backup and retention
- Providing Manheim personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files held in a secure manner. Paper files may also be archived in boxes and stored offsite in secure facilities. We take reasonable steps to:

- ensure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or phone number.

7.2 Security

The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to Manheim's computer systems (such as login and password protection), controlled access to Manheim's corporate premises, policies on document storage and security, personnel security (including restricting access to personal information on Manheim's systems to staff who need that access to carry out their duties, staff training and workplace policies).

Online credit card payment security

Manheim processes payments using EFTPOS and online technologies. All transactions processed by Manheim meet industry security standards to ensure payment details are protected.

Website security

While Manheim strives to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact Manheim by telephone or post (details under 10 below).

If you are a registered user of Manheim's website, you can also help to protect the privacy of your personal information by maintaining the confidentiality of your username and password and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

8. Access and Correction

If you would like to access or correct the personal information that we hold about you please contact our Privacy Officer. We may ask you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

9. How we will deal with your Complaints

If you have a complaint about how Manheim has collected or used your personal information, please contact the Privacy Officer and, if required, complete a Privacy Complaint Form (<http://www.manheim.com.au/OpalCMSAssets/Manheim/LinkReports/Privacy-Complaint-Form.pdf>), which asks you to explain the circumstances of your complaint, how you believe your privacy has been interfered with and how you believe your complaint should be resolved.

We will endeavour to acknowledge the Privacy Complaint form within 7 business days from receipt. In most cases a response to a complaint will be provided in 30 days of receipt of a Privacy Complaint Form. We will advise you of any delay in the response.

We will throughout the dispute resolution process, ensure that we provide you with the opportunity to communicate with us and negotiate and we will attempt to resolve your complaint in a fair and reasonable manner.



10. Our contact details

Please contact our Privacy Officer using the contact details below if you have any queries about Manheim and privacy:

Mail: Manheim Privacy Officer, PO Box 34, Altona North, Victoria, 3025, Australia

Email: privacy@manheim.com.au

Telephone: +61 3 9922 6555

11. Changes to this Policy

This policy may be changed from time to time to reflect changes in our practices concerning the collection and use of personal information. The revised policy will be effective immediately upon posting to our website.

This version of the Policy is effective 26 August 2014.