# CRUISIN MOTORHOMES PTY LTD Privacy Policy

Your privacy is important to us. This privacy policy ("the Policy"), explains how we collect, process, use, store and disclose your personal data, as well as your rights associated with that data.

### Who we are?

CRUISIN MOTORHOMES PTY LTD is Tasmania based tourism business.

We operate in multiple locations in Australia under the Cruisin Motorhomes, Cruisin Tasmania Motorhomes and GoCheap Campervans and Cruisin RV Sales brands.

Together we are the data controllers for the purposes of this policy, which is issued on behalf of all brands and entities within the CRUISIN MOTORHOMES PTY LTD. When we mention "CRUISIN MOTORHOMES PTY LTD", "we", "us" or "our" in this privacy policy, we are referring to the relevant entity in the CRUISIN MOTORHOMES PTY LTD group responsible for processing your data.

We also use a network of independent agents and licensees when providing our services around the world. Please note that those agents and licenses are not covered by this Policy, and we are not responsible for the privacy practices of any agent, licensee or other third party with whom you may transact before or at the same time as using our products or services.

### The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you, which we

have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, age, gender, driver's licence, passport details, security camera recordings and recordings of telephone conversations.
- Contact Data includes address, telephone numbers and email address.
- **Financial Data** includes payment card details, to see PCI compliance certification click <u>here</u>. To know more about how your financial details are stored click <u>here</u>
- **Transaction Data** includes details of your previous bookings with us, payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Vehicle-sourced Data includes information collected by data systems within a vehicle about its condition and performance (including mileage, fuel and other operational data) and your operation of the vehicle, including your speed, time, fuel consumption and distances travelled.

We also collect, use and share Aggregated Data such as statistical or demographic data, which may be derived from your personal data but is not personal data as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat that combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any Sensitive Data about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We do not collect any information about criminal convictions and offences, although we may be required to briefly hold and pass on any driving infringements that you incur while renting our vehicles.

**Refusal to provide your personal data:** You do not have to provide your personal data when we request it, but if you choose not to, we may not be able to respond to your queries and perform any contract we have or are trying to enter into with you (for example, to provide you with a rental vehicle). That may mean we have to cancel a product or service you have with us.

We will notify you at the time if that is the case.

### How we collect your personal data

We use different methods to collect personal data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in

forms on our websites and mobile applications, on third-party websites or in paper form

or by corresponding with us by post, phone, email or otherwise. That includes personal

data you provide when you:

- make an inquiry or booking with us or otherwise apply for any of our products or
- services
- purchase a product or service from us
- create an account on our website
- subscribe to our services or publications
- request marketing to be sent to you
- enter a competition, promotion or survey (including on third party social media
- platforms)
- give us feedback
- enter our premises on which security cameras are operating
- speak to us on the telephone

- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details. We may combine Technical Data (some of which will be anonymous) with other personal data we have collected from you in order to understand and measure your online experiences and determine what products, promotions and services are likely to be of most interest to you.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and certain public and technical sources:
- **Technical Data** from analytics providers such as Google and advertising networks such as Facebook.
- Identity and Contact Data when you make a booking or apply for our products or services through a third party (such as a travel agent), through interactions (Including transactions) with our service providers, business partners, agents, affiliates and subsidiaries (including other travel providers and insurance companies), from data brokers or aggregators such as Facebook and from publicly available sources such as phone directories, membership lists, professional and trade associations, government, bankruptcy or court registry searches and electoral registers.
- Unsolicited personal data. If we receive personal data that we have taken no active steps to collect (such as a job application sent to us by an individual on their own initiative, rather than in response to an advertisement), then we may keep that personal data if it is reasonably necessary for one or more of our functions or activities. We will destroy it or ensure it is de-identified, provided it is lawful and reasonable to do so.

#### <u>Marketing</u>

We aim to provide you with choices about how your personal data is used for marketing and advertising purposes.

You will only receive marketing communications from us if you have opted in or consented to receiving those communications. We may use your personal data collected in those circumstances to contact you and keep you up to date with the latest news, events, special offers and promotions of our brands, including by email, text messages or post.

You can update your subscription preferences or unsubscribe from marketing communications at any time by following the update preferences or unsubscribe instructions provided in each such communication, or alternatively by contacting us by clicking <u>here</u>.

We may display advertising for you to see on third party websites, including social media sites such as Facebook. We do this by matching information about your activity on CRUISIN MOTORHOMES PTY LTD websites with information collected on third party sites. That may

involve using your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you.

#### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider we need to use it for another reason compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### How we share your personal data

We may have to share your personal data with the following parties for the purposes set out in the table above or for other purposes directly related to the purpose for which the information was collected.

Service providers: Contracted third parties providing the following services:

- data processing
- IT and system administration
- marketing, market research and communication
- printing and distribution of marketing materials
- mailing, freight and courier
- price comparison websites
- Professional advisers acting as processors or joint controllers, including lawyers,
- bankers, auditors, consultants, insurers and recruiters.

#### Other third parties:

- regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances and/or where disclosure is required by law
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice
- other entities in the same or similar industries to us, for reasons of public safety
- where the law requires or authorises us to do so
- other third parties that you have been informed of at the time any information is collected from you

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal

data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### Your rights

You have the following rights in relation to your personal data.

- Access: you can request access to a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Correction:** you can request that any incomplete or inaccurate data we hold about you is corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Erasure:** you can ask us to delete or remove your personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing: where we are relying on a legitimate interest (or those of a third party) and you believe our processing of your personal data impacts your fundamental rights and freedoms, you may object to such processing for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.
- Restrict processing: you can ask us to suspend the processing of your personal data:

   (a) if you want us to establish the data's accuracy;
   (b) where our use of the data is unlawful but you do not want us to erase it;
   (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Data portability: you can request that your personal data is transferred to you or a third party. We will provide you or a third party you have chosen with your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent: you may withdraw your consent to our processing of your personal data. If you do so, we may not be able to provide certain products or services to you. We will advise you if that is the case when you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer

**No fee usually required:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If we choose to deny your request, we will inform you of the decision and your right to complain to the supervisory authority within the 1-month deadline.

What we may need from you: We may need to request specific information from you to help us confirm your identity and ensure that personal data is not disclosed to any person who has no right to receive it.

**Time limit to respond:** We respond to all legitimate requests without undue delay and at the latest within one month. Occasionally, if your request is particularly complex or you have made several requests, we may need to extend this by up to a period of two months, in which case we will notify you and keep you updated.

#### Security of your personal data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

### **Contact Details**

EU Supervisory Authorities: If you are an EU data subject and feel that your personal data has been processed in a way that does not comply with the GDPR, you may lodge a complaint with the relevant supervisory authority in your country. We would, however, appreciate the chance to deal with your concerns before you approach them, so please contact us in the first instance.

**Data Protection Officer:** We have appointed a data protection officer (DPO) who is responsible for overseeing privacy issues for the CRUISIN MOTORHOMES PTY LTD. If you have any questions or complaints about his Policy, including any requests to exercise your rights in relation to your personal data,

please contact the DPO using the details set out below.

- Email address: marketing@cruisinmotorhomes.com.au
- Postal address: 3 Runway place, Cambridge, Tasmania 7170

## Changes to the Privacy Policy and your duty to inform us of changes

We reserve the right to update and change this Privacy Policy at any time by posting changes on this webpage or applicable mobile apps. Changes will take effect from the time they are posted. We will use reasonable endeavours to communicate those changes to you on our website and mobile apps or via other channels that we think are suitable. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.