



## Volvo Financial Services

### PRIVACY POLICY (INCLUDING CREDIT REPORTING POLICY)

Volvo Finance Australia Pty Ltd, ACN 071 774 233, also trading as Volvo Financial Services, ('VFS', 'we', 'us', 'our') is committed to protecting your privacy and the confidentiality of your personal and credit information (information). In handling your personal and credit information, we are bound by, and comply with, the Privacy Act 1988, the Australian Privacy Principles (**APPs**) and the Credit Reporting Privacy Code (**Code**).

This policy sets out how we collect and manage your personal and credit information, how you can access certain information we hold about you and how you can complain if you are not satisfied with our policies and processes.

#### A. Definitions

"**Privacy Policy**" means our privacy policy contained herein in Part B which sets out our general privacy obligations under the Privacy Act. Unless otherwise specified in the Privacy Policy or Credit Reporting Policy, our Privacy Policy also applies to your credit information.

The term "**personal information**" as used throughout this policy, applies to any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not.

"**Website**" in this policy means our website.

"**Credit Reporting Policy**" means our credit reporting policy contained herein in Part C which sets out how we manage your credit information and credit eligibility information where this is relevant to you, in accordance with our obligations under Part IIIA of the Privacy Act.

The term "**credit information**" includes any of the following information types:

- Identification details
- Credit liability
- Credit eligibility information
- Repayment history
- Credit Reporting Body enquiries
- Product details – loan/lease details
- Defaults
- Payment information
- Payment arrangements
- Court actions
- Insolvency events
- Publicly available credit information
- Serious credit infringements – credit fraud (attempted or actual) and/or avoidance of loan/lease obligations

"**Information**" in this policy shall mean both, personal information and credit information (in so far as VFS Privacy Policy 50318

applicable and only if relevant).

## **B. Privacy**

### **1. Collection of information**

Subject to our Credit Reporting Policy, we collect information from, and about, you to, as appropriate:

- respond to your enquiries about our finance products or insurances we can source for you
- assess your credit application and provide you with the finance you require from us
- assess the application for finance made by a company of which you are a director
- assess your application to guarantee the repayment of finance we are considering providing
- provide customer support
- promote our finance products
- manage any complaints
- manage any business arrangements under which we provide or receive goods or services
- market products, services and special offers
- send information to you where you have requested such information
- source any required insurances
- manage any finance contract
- manage or administer the services Volvo and VFS provides
- identify, address and prevent fraud
- comply with legislative requirements such as those arising from the Anti-Money Laundering and Counter-Terrorism and Financing Act 2006 (Cth) and the National Consumer Credit Protection Act 2009 (Cth)
- provide any other purposes for which Volvo or VFS may reasonably need your personal or credit information
- provide any other purposes which is permitted or required by law.

The information we collect may include personal identification, contact details, financial information, lending and default history, banking details, personal and trade references and employment or business history, depending on the relationship you wish to have with us. If you choose not to provide this information, our ability to assist you may be restricted.

Wherever possible, and subject to our Credit Reporting Policy, we will collect your information directly from you, or from your broker, should you wish to apply for finance. We may obtain personal information about you from a third party, such as your accountant or a credit reporting body, for a particular purpose. Wherever possible we will tell you who we need to contact and why.

Subject to any restrictions imposed on us by any legislation, we may also collect information from you or a third party such as a credit reporting body if you choose to use our website to communicate with us. We will collect the information you provide through our interactive facilities, such as customer enquiry, online finance application or comment forms.

In some circumstances, brokers, dealers, accountants, referees, external dispute resolution schemes, your agents and government bodies may provide us with your information. The circumstances in which third parties provide us with information include purchase or service requirements, employment or finance applications, account management and complaints.

## 2. Website tracking

We may also collect information about your computer or other electronic device when you visit our websites and use our online resources. This information may include your Internet Protocol (IP) address, domain name, browser type, date and time of your request and information provided by tracking technologies, such as cookies and single-pixel tags. If you use a mobile device to access our web sites and online resources, we also may collect information about your device, such as your device ID and device type, as well as usage information about your device and your use of our mobile websites and other mobile resources.

Some of our websites and other online resources use tracking technologies to provide additional functionality that enables you to use these resources more effectively.

### ***What are cookies?***

A cookie is a small data file that is sent by web servers to your computer's hard drive, where your Internet browser files are kept. Cookies enable websites to store small bits of information on your computer and retrieve that information at a later time. We may use two types of cookies: session cookies, which are temporary cookies that are erased from your computer's memory when you close your Internet browser or turn your computer off, and persistent cookies, which exist on your computer's hard drive until they expire, unless you delete them at an earlier time.

### ***What are single-pixel tags?***

Single-pixel tags, also known as web beacons or web tags, are graphics that function similar to cookies. Single-pixel tags are not visible because of their small size. They are used to collect information in web logs that does not identify you personally such as web pages viewed, the web site you came from and the advertisement you clicked on to visit our web sites. They are also used to determine whether certain promotional or other commercial e-mail messages we send are opened.

## 3. What information we collect

The information collected and held by us about you, may include:

- name;
- gender;
- date of birth;
- address;
- telephone numbers;
- e-mail address;
- occupation;
- drivers licence number;
- drivers licence state;
- ABN;
- purchase details;
- any credit information (subject to our Credit Reporting Policy);
- warranty and service transaction information provided by our dealer network, affiliates or third parties; and
- any other relevant information.

You may choose not to provide us with your information. However, without certain personal information we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

We do NOT actively collect or hold, nor do we need to know any sensitive (personal) information (such as personal information about your racial or ethnic origin, health information, political opinions, membership of a political association, professional or trade association or trade union, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices, criminal record, genetic information, biometric information or biometric templates). If we do require such sensitive information to be provided or are required to share such sensitive information, we will ask for your consent first unless we are otherwise required by law to collect or disclosure such sensitive information.

#### **4. Use and disclosure**

We use your information to provide you with the finance and other services or support you require from us, consider your suitability to be a guarantor and perform other functions and activities associated with managing our relationship.

Those functions and activities can include our internal administration, credit assessment, account management, product or service development, compliance audits/reviews, marketing, complaints management, planning and research requirements as well as future offers of finance to you.

Where you, as an individual, apply for finance with us, or agree to act as a guarantor, you authorise how we may collect, use and disclose your personal and credit information in the Privacy Statement and Consent we ask you to sign before we consider your application for credit or to be a guarantor.

We also use the information we collect to:

- manage your account
- develop new products, policies and procedures
- undertake market research
- obtain legal and compliance advice about our obligations
- meet our regulatory and legal obligations

We will disclose your information to third parties only as the Privacy Act permits and where there is a valid reason to do so. All third parties must use your information only for the specific purpose for which we supply it.

Third parties may include:

- Employees, contractors, auditors and advisers
- Credit reporting bodies
- Service providers (e.g. computer systems consultants, document custodians, mailing houses etc) to enable them to perform those services), including our IT service providers in the United States of America
- Your agents, including your broker, where required
- Insurers, insurance brokers and insurance assessors
- Debt collection agencies
- Referees, where authorised
- Companies to which we are related
- Government authorities and law enforcement agencies, as required by law only.

We may also provide your information to, and receive your information from, a credit reporting body (CRB). We may:

- Disclose your information to Equifax for credit assessment or collections

- purposes
- Use information provided by the CRB for credit assessment or collections purposes, including:
  - Your name, address and date of birth
  - Current and previous credit account history
  - Repayment history
  - Default history
  - Any court proceedings – summons, judgement and Bankruptcy actions
  - Serious credit infringements history, covering fraudulently obtaining, or attempting to obtain finance or shown an intention to avoid repayment obligations
- Provide the CRB with your repayment history
- Notify the CRB of any overdue payments, provided they are more than 60 days overdue, we have attempted to collect the payment and we have notified you of our intention to do so
- Notify the CRB of a serious credit infringement if we have reasonable grounds to believe you fraudulently obtained, or attempted to obtain, credit from us or that you have shown an intention to evade your obligations under the contract with us
  - We will only do this if we have not been able to contact you over a 6 month period
  - To assist you to manage your debts or the company's debts or collect any amounts you or the company owes
  - As the law authorises or requires;
- Ask the CRB to assess your eligibility to receive direct marketing material from us

In addition, we may:

- Obtain from, and disclose to, any third party information about you, the applicant(s) or guarantor(s) that is reasonably necessary to assess, arrange, provide or administer your credit application or guarantee and any insurance requirements;
- Provide credit information about you to a guarantor, or prospective guarantor;
- Provide you, or the company of which you are a director, with offers or information of other goods or services we, or any of our associated entities, may be able to provide to you or the company unless you tell us not to;
- Disclose your personal and credit information to other organisations that provide us with services, such as contractors, agents, printers, mail houses, lawyers, document custodians, securitisers and computer systems consultants or providers, so they can perform those services for us;
- Disclose your information to any other organisation that may wish to acquire, or has acquired, an interest in our business or any rights under your contract with us, or the contract with us of a company of which you are a director.

Any information shared with, or by, a CRB is held in electronic form, trackable through the CRB or our systems by time, date, account and user.

Where information is provided to our service providers in the United States of America, we require them to comply with our information management policies and procedures so your information has the same protections as if managed in Australia.

## 5. Storage and security

We keep your information only for as long as it is reasonably necessary for the purpose of collection and in accordance with any applicable legal reporting or documentation retention requirements.

We may use your information to send you further information, if it relates to the purpose of collection, which we consider being of importance to you, but we will always provide you with the opportunity to tell us if you do not want to receive this further information.

We will store your information in a secure environment. It's protected by a combination of physical and technological measures.

Employees and third-parties that do have access to your information are trained adequately about information security and privacy and they are bound by confidentiality agreements.

In accordance with our Privacy Policy, we have implemented strict procedures and systems designed to protect the security of your information. Our aim is to carefully protect your data from misuse, interference, loss, unauthorised access, modification or disclosure, alteration or destruction.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Whilst we strive to protect your information from misuse, loss and unauthorised access, we cannot guarantee the security of any information you transmit to us or receive from our online products or services sites. You conduct these activities at your own risk. Once we receive your transmission, we make our best effort to ensure its security.

If a data breach occurs in respect of your information we may notify you about such data breach if we are required by law to do so.

If you want more information about the way we manage the information we hold please contact us as we would be happy to provide you with further information on our processes.

## **C. Credit Reporting**

### **1. What information we collect and how it is used and held**

In addition to the information collected by us under [item 3](#) of our Privacy Policy we collect as much of this credit information from you where we can. Some credit information is also obtained from a Credit Reporting Body (**CRB**), credit providers identified in your credit application and other parties, as necessary.

Information we obtain in, or derive from, your credit application and/or from a CRB is defined as *credit eligibility* information.

We use this information, called *derived information*, to assist us determine whether you meet our credit criteria. We also use other information to decide whether to accept or decline your application. Any information is used by use in accordance with [item 4](#) of our Privacy Policy.

All information we hold about you is held in electronic and/or hardcopy form and securely stored in accordance with [item 5](#) of our Privacy Policy.

### **2. Credit Reporting Body Disclosures and Exchange of credit information**

When we collect credit information from you in the credit application process, we use that credit

information in a number of ways to assess your credit application and to manage any credit contract that results. We may:

- Disclose your credit information to Veda, a credit reporting body/bodies (CRB).
- Use credit information the CRB provides to assist us assess your credit or guarantor application, or the application of a company of which you are director.
- Notify the CRB of any overdue payments on consumer credit, provided they are more than 60 days overdue, we have attempted to collect the payment and we have notified you of our intention to do so.
- Notify the CRB of a serious credit infringement of your consumer credit if we have reasonable grounds to believe your fraudulently obtained, or attempted to obtain, credit from us or that you have shown an intention to evade your obligations under the contract with us. Note that we will only do this if we have not been able to contact you over a 6 month period.
- Check the CRB for updated contact details if we lose contact with you.
- Ask the CRB to assess your eligibility to receive direct marketing material from us.
- The CRB may include your credit information in reports to other credit providers to assist them in assessing your credit worthiness.

In addition, we may collect and exchange your information (in so far as is permitted by any applicable law) with third parties such as:

- any other credit provider where you may have or have a consumer or commercial credit interest;
- the dealership where your vehicle is purchased or other authorised dealerships for the purpose of:
  - managing your finance contract/guarantee (including the current standing of your account with us); and
  - enforcing overdue accounts due to us,
- any other applicants or guarantor's;
- your insurer and/or broker;
- parties who you refer to us or parties who refer us to you.

#### **D. Information Access, Correction and Complaints - Contact Us**

You have the right to ask:

- us to provide you with the credit and personal information we hold about you
- us to correct the credit information we hold if it is incorrect

For access, please contact our Privacy Officer (contact details set out below).

If you wish to notify us of your new contact details, make a complaint about a breach of privacy or our credit reporting obligations or have any questions in relation to the accuracy of your information or privacy, please contact our Information and Privacy Officer by:

**Email:** vfs.customerservice@volvo.com  
**Address:** Volvo Finance Australia Pty Ltd 20 Westgate Street, Wacol Qld 4076  
PO BOX 4047, Mt Ommany Qld 4074  
**Telephone:** +1300 720078  
**Telefax:** +64 7 3718 3391  
**Website:** [www.vfsco.com.au](http://www.vfsco.com.au)

If you lodge a complaint, our Internal Dispute Resolution officer will investigate your complaint. We will commence the investigation within **2 days** and provide you with a response within **14 days**. We will seek your agreement to a longer time if it is needed. We will keep you informed of the

investigation process by phone or email at least once a week and provide you with a written response to your complaint within **30 days**.

You can also access your credit information the CRB holds about you by contacting them for a copy of that information at:

**Email:** [www.equifax.com.au/contact](http://www.equifax.com.au/contact)

**Address:** Equifax Australia  
PO Box 967  
North Sydney NSW 2059

**Telephone:** 13 83 32

#### **E. Miscellaneous**

We may provide access to other sites by way of hyperlinks from this web site. These other sites may not be subject to our privacy and credit reporting standards and procedures. You should make your own enquiries as to the privacy standards for each linked site.

This Privacy Policy and Credit Reporting Policy may be amended from time to time. Any updates will be published on our website. We will not separately notify you of changes to the policy.