

About this Credit Information and Credit Reporting Policy

Webasto Thermo & Comfort Australia Pty Ltd trading as Webasto is committed to respecting your right to privacy and protecting your personal information.

We are bound by Part IIIA of the *Privacy Act 1988* (Cth) (**Act**) and the Credit Reporting Privacy Code (**Code**).

We will ensure that all officers, employees and subcontractors are aware of and understand Webasto's obligations as well as their own obligations under the Act and the Code. We will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent credit information from being collected, used, disclosed, retained, accessed or disposed of improperly.

This Policy applies if:

- You are an individual applying for the supply of goods or services by Webasto on credit or delayed payment terms; or
- Webasto deals with you in connection with credit or delayed payment terms applied for by, or provided to, a customer or client of Webasto – for example, if you are a guarantor or proposed guarantor for credit or if you are a director of a company obtaining credit.

The purpose of this Policy is to:

- Give you a better and more complete understanding of the kinds of credit information and credit eligibility information we collect and hold;
- Clearly and concisely communicate how we collect and hold credit information and credit eligibility information;
- Inform you about the purposes for which we collect, hold, use and disclose credit information and credit eligibility information;
- Provide you with information about how you may access your credit information or credit eligibility information, and seek correction of that information;
- Provide you with information about how you may make a complaint, and how we will deal with any such complaint;
- Advise you of the circumstances in which we are likely to disclose credit information or credit eligibility information to overseas recipients; and
- Enhance the transparency of our operations.

For the purpose of this Policy, the terms **credit information** and **credit eligibility information** will have the meanings attributed to them by section 6 of the Act:

Kinds of credit information and credit eligibility information we collect and hold

Whenever prospective or current clients and customers deal with Webasto, we may collect and provide the following information from and to credit reporting bodies:

- Identification information, including but not limited to your name, date of birth, gender, current or last known address and previous two addresses, name of current or last known employer and drivers licence number.
- Information about any payment defaults by you.

- Information about any Australian court proceedings relevant to your credit.
- Personal insolvency information relating to your bankruptcy or your entry into a debt agreement or personal insolvency agreement.
- Payment information relating to payment defaults, which have subsequently been satisfied.

How we collect credit information and credit eligibility information

We may collect credit information and credit eligibility information directly from you, from details included in your credit application form, and from persons acting on your behalf (eg. employees or agents). In addition, we may collect credit information and credit eligibility information from the following sources:

- Credit reporting bodies;
- Your guarantors or proposed guarantors;
- Our service providers involved in helping us to provide credit or to administer credit products, including our debt collectors and legal advisers.

The purposes for which we collect, hold, and use credit information and credit eligibility information

Credit information and credit eligibility information collected by Webasto will ordinarily be held, used or disclosed for the following purposes:

- Providing you with goods or services on credit;
- Assessing applications for credit;
- Assessing whether to accept a guarantor;
- To assist with the management, including recovery, of outstanding debts;
- Warranty claims;
- Product recall notifications;
- Recording or accessing information on a credit reporting database;
- Client and business relationship management;
- Marketing of products and services to you.

We may disclose your information to a credit reporting body

We may disclose information about you to a credit reporting body if you are applying for credit or you have obtained credit from us or if you guarantee or are considering guaranteeing the obligations of another person to us or you are a director of a company that is a credit applicant, borrower or guarantor.

When we give your information to a credit reporting body, it may be included in reports that the credit reporting body gives other organisations to help them assess your credit worthiness.

Some of that information may reflect adversely on your credit worthiness, for example, if you fail to make payments.

Accuracy of Credit Information and Credit Eligibility Information

Webasto will take reasonable steps to ensure that all credit information and credit eligibility information it collects, uses or discloses is accurate, complete and up-to-date.

If you believe your personal information is not accurate, complete or up-to-date, please contact us (see the **Contacting Us** section for more information).

Security

Your credit information and credit eligibility information may be stored in hard copy documents or electronically. Webasto is committed to keeping your information secure and safe. Some of the ways we do this are:

- Requiring employees and contractors to enter into confidentiality agreements.
- Secure hard copy document storage (i.e. storing hard copy documents in locked filing cabinets).
- Security measures for access to our computer systems.
- Providing a discreet environment for confidential discussions.
- Access control for our buildings.
- Security measures for our websites (see the **Your Privacy on the Internet** section for more information).

We will review and update our security measures from time to time.

In addition, we will review the credit information and credit eligibility information held by us from time to time, ensuring that information which is no longer needed for a purpose for which it was initially collected is destroyed or de-identified.

Disclosure of credit information or credit eligibility information to overseas recipients

In order to perform one or more of our functions or activities, Webasto may transfer your credit information or credit eligibility information to companies in the Webasto Group. These countries include, but are not limited to:

- USA.
- Germany.
- Austria.
- Denmark.
- Netherlands.
- Belgium.
- Italy.
- Spain.
- Switzerland.
- Slovenia.

- Czech Republic.
- Hungary.
- Romania.
- Slovakia.
- Ukraine.
- Poland.
- Brazil.
- South Africa.
- China.

Whenever we transfer your personal information overseas, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Like many other businesses in Australia, Webasto may rely on third party suppliers or contractors to provide specialised services such as web hosting, cloud computing technology and data storage services. If credit information or credit eligibility information is provided to these suppliers and contractors in order to enable them to perform the agreed tasks, we will make every effort to ensure that the supplier or contractor handles the information in accordance with the Act and the Code. We will also require all suppliers and contractors to provide privacy undertakings and enter into confidentiality agreements.

Access to Credit Information and Credit Eligibility Information

You may request access to credit information and credit eligibility information that Webasto holds about you (see the **Contacting Us** section for more information).

Upon receipt of such a request, we must:

- Provide you with access to the information within 30 days (unless unusual circumstances apply);
- Make the information clear and accessible; and
- Ask you to check with credit reporting bodies what information they hold about you.

You will need to verify your identity before access to your information is granted.

While we cannot and do not charge an “application fee” for you applying to access your credit information and credit eligibility information, we may charge a fee for actually giving you access to your information in your preferred format (where reasonable and possible), which will cover our costs involved in locating and collating information as well as reproduction costs.

We are not required to give you access to the information if:

- It would be unlawful; or
- It would be likely to harm the activities of an enforcement body (eg. the police, ATO, etc.).

If we do not agree to provide access to your credit information or credit eligibility information, we will provide written reasons for the refusal and the mechanisms available to complain about the refusal (see the **Complaints** section for more information).

Correcting your Credit Information and Credit Eligibility Information

If you ask us to correct your credit information or credit eligibility information:

- We will advise you within 5 business days:
 - If we are able to correct the information. In these circumstances, we will correct the information held by us within 30 days of receipt of your request and we will also inform any relevant third parties of the correction; or
 - If we are unable to correct the information. In these circumstances, we will provide written reasons for the failure to correct your information and the mechanisms available to complain about the failure to correct your information (see the **Complaints** section for more information).
- We are required to assist you to have the information corrected, regardless of whether we made the error or someone else made the error. We may need to talk to other persons or organisations in order to assist you. Alternatively, you may choose to send a correction request to the person or organisation that made the error.

Contact details and other information relating to Credit Reporting Bodies

As outlined above, we may collect information from, and provide information to, one or more credit reporting bodies.

The contact details of the credit reporting bodies we may use from time to time are outlined below. Each credit reporting body has their own credit reporting policy, which can be accessed on their websites.

Dun & Bradstreet Australia

Online: www.checkyourcredit.com.au

Phone: 1300 734 806

Mail: Attention Public Access Centre Dun & Bradstreet Australia PO Box 7405 St Kilda Rd VIC 3004

Experian Australia

Online: www.experian.com.au

Phone: 1300 783 684

Mail: Consumer Support Experian Australia P.O. Box 1969 North Sydney NSW 2060

Veda Advantage Business Information Services Ltd

Online: www.mycreditfile.com.au

Credit reporting bodies offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called "credit pre-screening". You have the right to request that the credit reporting bodies do not use your information for this purpose. To opt out of credit pre-screening, contact the credit reporting body, using the contact details on their websites noted above.

You can also ask a credit reporting body not to use or disclose your personal information for a period if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

Contacting us

You may contact us by mail, email or telephone as follows:



PO Box 3125, Kirrawee NSW 2232



info@webasto.com.au



+61 2 8536 4800

Complaints

If you consider that there has been a breach of the Act or the Code, you are entitled to complain to Webasto (see the **Contacting Us** section for more information).

We will acknowledge receipt of a complaint within 2 business days.

We will investigate the complaint and attempt to resolve it within 20 business days after the complaint was received. Where it is anticipated that this timeframe is not achievable, we will contact you to provide an estimate of how long it will take to investigate and respond to the complaint.

If you consider that we have not adequately dealt with a complaint, you may complain to the Office of the Australian Information Commissioner on the below details:



Officer of the Australian Information Commissioner (OAIC)
GPO Box 5218
SYDNEY NSW 2001



enquiries@oaic.gov.au



1300 363 992

Alternatively, you may complain to the Financial Ombudsman Service on the below details:



Financial Ombudsman Service
GPO Box 3
MELBOURNE VIC 3001



privacy@fos.org.au



1300 780 808

Review

This policy is to be reviewed as follows:

- Annually as a minimum.
- Following significant changes to our systems.
- Following changes to the relevant State and Commonwealth legislation

Reviews are to examine the appropriateness of the policy taking into consideration corporate, system and compliance requirement changes since the last review was undertaken.

The most up-to-date version of Webasto's Credit Information and Credit Reporting Policy will be available on our website: www.webasto.com/au/