

PRIVACY POLICY

INTRODUCTION

Elite 4x4 Darwin and its related corporate entities (collectively, “we”, “us”, “our” or “the Company”) is committed to protecting the privacy of your personal information. We want you to feel comfortable using this site. This Privacy Policy deals with personally identifiable information (“personal information”) that may be collected by this site or through other contact with you outside of the site.

We are required to comply with the *Privacy Act 1988 (Cth)* (“Privacy Act”) including the Australian Privacy Principles (“APPs”) in Australia.

This Privacy Policy is intended to provide a general overview of our policies for the handling of your personal information. It covers the collection, processing, and other use of personal data under the General Data Protection Regulations (“GDPR”) 2018. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances.

By using this website and/or providing your personal information to us, you consent to us handling your personal information in accordance with this Privacy Policy.

COLLECTION OF YOUR PERSONAL INFORMATION

The kinds of personal information we collect and hold about you, and our use of that information, is dependent on the products and services we provide to you.

In addition to operating a store, the products and services that we (and/or our distributors, stockists and resellers) provide include the selling, development and advertising of 4WD/SUV accessories and providing services in connection with fitting, repairing and replacing 4WD/SUV accessories.

Generally, the personal information we may collect from you may include (but is not limited to) your name, address, telephone number, email address and details of the products or services you have enquired about or purchased.

Generally, we collect your personal information directly from you unless it is impracticable or unreasonable to do so (for example where you deal with a distributor, rather than us). From time to time, we may collect personal information about you from third parties (for example, from your representative, from publicly available sources, from your referees where you apply for a position with us, when you transact with our distributors or if you apply to become a distributor).

If you provide us with personal information about a third party you represent, then we collect it on the basis that you have that person’s consent for us to collect and handle their personal information in accordance with this Privacy Policy.

When collecting your personal information, we will take reasonable steps to provide you with certain information as required under the APPs, including the purpose of collection, who we may disclose your personal information to, any law that requires or authorises us to collect the information and the main consequences if we do not collect all of the personal information we require. If we collect your personal information from another source, we will take reasonable steps to ensure you are aware of the fact and the circumstances of that collection.

Generally, if we are unable to collect the personal information that we require, we may not be able to provide you with the products and services you seek. If the information provided is incorrect or incomplete, this may also prevent, limit or otherwise affect our ability to provide products or services to you.

We will only collect 'sensitive information' with your consent. We will assume that you have consented to us collecting all information which is provided to us by you for use in accordance with this Privacy Policy, including any 'sensitive information', unless you tell us otherwise at the time you provide it to us.

Registration for an account on this site requires only a valid email address and a username. You are not required to provide any other personal information if you do not want to. Please be aware that the username you choose, the email address you provide and any other information you enter may render you personally identifiable and may possibly be displayed on this website intentionally (depending on choices you make during the registration process, or depending on the way in which the site is configured) or unintentionally (subsequent to a successful act of intrusion by a third party).

As on many websites, the site may also automatically receive general information that is contained in server log files, such as your IP address, and cookie information. Information about how advertising may be served on this site (if it is the site’s policy to display advertising) is set out below.

USE OF DATA

We will use and disclose your personal information for the purposes for which we collected it, and for other related purposes that you would reasonably expect. We may hold and process personal data that you provide to us in accordance with the GDPR (General Data Protection Regulation).

Generally, these purposes include responding to your enquiries, providing you (or arranging for our suppliers and distributors to provide you) with products and services such as those set out in the section above, providing you with marketing information about our products and services and those of our suppliers, obtaining your feedback on your customer experience, conducting promotional activities and for our general business operations (for example, recruitment, maintenance of our business records, compliance with our legal and insurance obligations and statistical purposes).

By providing us with your personal information, you consent to us using your personal information for these purposes. You agree that we may send you such information by post or by electronic means such as email. You can opt-out of marketing and promotional communications at any time.

We may exchange your personal information within our own corporate entities. We may also disclose your personal information to our suppliers, distributors, licensees, agents and contractors for the purposes set out above, and for the purposes of those parties providing services to us or performing business services or functions on your behalf.

Apart from the above instances, we may also use and disclose your personal information with your consent and as otherwise required or permitted.

Your personal information may be used to customize and improve your user experience on this site. Efforts will be made to prevent your personal information being made available to third parties unless:

- provided for otherwise in this Privacy Policy;
- your consent is obtained, such as when you choose to opt-in or opt-out for the sharing of your personal information;
- a service provided on our site requires interaction with a third party, or is provided by a third party, such as an application service provider;
- pursuant to legal action or law enforcement;
- it is found that your use of this site violates the site editor's policy, terms of service, or other usage guidelines, or if it is deemed reasonably necessary by the site editor to protect the site editor's legal rights and/or property; or
- this site is purchased by a third party, in which case that third party will be able to use the data in the same manner as set forth in this Privacy Policy.

In the event you choose to use links displayed on this web site to visit other web sites, you are advised to read the privacy policies published on those sites.

STORAGE AND SECURITY

We may hold your personal information in electronic formats or in hard copy. We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss. This includes electronic and physical security measures and procedures, staff training and use of password protection software.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for legal, insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our websites. Please bear this in mind when transmitting information by this means to us.

The *Privacy Amendment (Notifiable Data Breaches) Act 2017* established the Notifiable Data Breaches Scheme ("NDB scheme") in Australia. The NDB scheme sets out obligations for notifying affected individuals, and the Australian Information Commissioner ("Commissioner"), about a data breach which is likely to result in serious harm. Where serious harm to affected individuals is likely, we will notify those individuals and the Commissioner in accordance with our legal obligations. You may contact our Policy Officer via the contact details below should you require additional information.

ACCESS AND CORRECTION

The Privacy Act, APPs and the GDPR give you the right to access information held about you by us. You may lodge a request to access and correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading by contacting our Policy Officer via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the APPs permit us to deny access. Any such requests must be made in writing and directed to our Policy Officer via the details shown below. Under the APPs, we are permitted to charge you a reasonable fee for providing access to your personal information. Please note that no fee will be incurred for requesting access, and if your request for access is accepted, we will inform you of the fee (if any) that will be payable for providing access if you proceed with your request.

You may ask us to inform you of the source of any personal information about you that we have collected from a third party. We will provide this at no cost, except in limited circumstances where the APPs or other laws permit us to withhold this information.

You have the right to change the permissions that you have given us in relation to how we may use your personal information. You also have the right to request that we cease using your personal information or that we delete all records that we hold relating to you. You can exercise these rights at any time by writing to our Policy Officer at the address below.

COOKIE POLICY

By using or accessing www.elite4x4darwin.com.au ("Website"), you are consenting to Elite 4x4 Darwin's use of Cookies as set out in this Cookie Policy.

This policy helps to explain the occasions when and why cookies may be sent to visitors to the Website (referred to in this policy as "we", "us" or "our"). "Cookies" are text-only pieces of information that a website transfers to an individual's hard drive or other website-browsing equipment for record-keeping purposes. Cookies allow the Website to remember important information that will make your use of the site more convenient. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a randomly generated unique number or other value. Certain cookies will be used on the Site regardless of whether you are logged in to your account or not. Like most websites, we use cookies for a variety of purposes, in order to improve your online experience, for analytics and for marketing, but specifically we use Cookies on the Website for the following purposes:

Analytical Purposes: We use Cookies to analyse user activity in order to improve the Website. For example, using Cookies we can look at aggregate patterns like the average number of searches that users perform. We can use such analysis to gain insights about how to improve the functionality and user experience of the Website.

Your Preferences: We use Cookies to store certain user preferences on our Website. For example, we may store the recent searches you have performed in a Cookie so that we can allow you to easily repeat those searches when you return to our Website.

Marketing: We use Cookies from third-party partners such as Google and Facebook for marketing purposes. These Cookies allow us to display Elite 4x4 Darwin's promotional material to you on other sites you visit across the Internet. Elite 4x4 Darwin may also share information about your behaviour on the Website with third parties (including operators of third-party websites and/or social networking sites) in order to show you targeted advertisements and other content that has been customised for you.

Referral Tracking: We use Cookies to associate user activity with the third-party website that referred the user to our Website, or to associate user activity that Elite 4x4 Darwin referred to a third-party website. These third-party partner websites receive credit for the activity of users they refer to our Website or give Elite 4x4 Darwin credit for the activity of users referred to such third party websites. We do not share any personal information or information about individual user activities with these partner entities.

Session Cookies are temporary cookies that remain in the cookie file of your browser until you leave the Website.

Persistent Cookies remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie). When we use session cookies to track the total number of visitors to our Website, this is done on an anonymous aggregate basis (as cookies do not in themselves carry any personal data). We may also employ cookies so that we remember your computer when it is used to return to the Website to help customize your Elite 4x4 Darwin web experience. We may associate personal information with a cookie file in those instances. Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. You can easily delete any cookies that have been installed in the cookie folder of your browser. Please refer to your browser's cookie settings support pages to confirm the most up-to-date instructions.

If you disable all cookies, you may not be able to take advantage of all the features of this website. Consult your mobile device documentation for information on how to disable cookies.

Elite 4x4 Darwin uses the features of Google Analytics for Display Advertisers. Elite 4x4 Darwin and Google use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform,

optimize, and serve ads based on your past visits to our Website. This means that vendors including Google will display Elite 4x4 Darwin promotional material on other sites you visit across the Internet.

You may opt-out of Google Analytics for Display Advertisers and opt-out of customized Google Display Network ads by visiting the Google Ads Preferences Manager. To provide website visitors more choice on how their data is collected by Google Analytics, Google has developed an Opt-out Browser add-on, which is available by visiting Google Analytics Opt-out Browser Add-on, to enable you to opt-out of Google's programs.

MARKETING SERVICE PROVIDERS

If you do not want Elite 4x4 Darwin and its marketing services providers to follow your usage of our services via the third-party marketing services providers' cookies and Web beacons, or to learn more about these providers and their privacy policies, please visit their website. Opting out of these services does not mean you will no longer receive online advertising. It does mean that the service from which you opted out will no longer deliver ads tailored to your Web preferences and usage patterns.

In all cases where third party cookies are used to track your behaviour on Elite 4x4 Darwin's website, you must refer to such third party's website to learn how to remove cookies for that third party specifically. Removing Elite 4x4 Darwin cookies from your browser will not affect cookies placed by third parties.

CHANGES TO OUR COOKIE POLICY

From time to time, it may be necessary for us to change this cookie policy. We suggest that you check here periodically for any changes.

Advertisements may display on this web site and, if so, may set and access cookies on your computer; such cookies are subject to the privacy policy of the parties providing the advertisement. However, the parties providing the advertising do not have access to this site's cookies. These parties usually use non-personally identifiable or anonymous codes to obtain information about your visits to this site.

COMPLAINTS

You may lodge a complaint with us if you believe we have handled your personal information other than in accordance with the APPs. To do so, please address any correspondence with attention to: Policy Officer via the contact details below. We will confirm receipt of your complaint and set out the time frame we require to investigate your complaint and provide you with a response. We will endeavour to respond as quickly as possible, which will typically be within 14 days of receiving your complaint.

OVERSEAS DISCLOSURE

Generally, we will not disclose your personal information to overseas recipients, except upon your request, or if we are authorised or required to do so by law.

If you consent to the disclosure of your personal information to an overseas entity, you understand and agree that:

- the overseas recipient is unlikely to be required to comply with the Privacy Act and APPs;
- the overseas recipient may not be subject to privacy laws that are similar to the Privacy Act or APPs (and may even be compelled to make certain disclosures of your personal information under the privacy regime applicable to them, for example disclosure to the overseas government authorities);
- we may not take steps to ensure that the overseas recipient handles your personal information in accordance with the Privacy Act and APPs;
- the overseas recipient may handle your personal information other than in accordance with the Privacy Act or APPs, in which case you will not be able to seek redress for such acts or practices under the Privacy Act; and
- we will not be responsible for, or otherwise liable for, the way in which the overseas recipient handles your personal information.

As part of the services offered to you, for example through our site, the information you provide to us may be transferred to and stored in countries outside of the European Economic Area ("EEA") as we use remote website server hosts to provide the website and some aspects of our service, which may be based outside of the EEA, or use servers based outside of the EEA - this is generally the nature of data stored in "the Cloud". It may also be processed by staff operating outside the EEA who work for one of our suppliers, e.g., our website server host, or work for us when temporarily outside of the EEA.

A transfer of your personal data may happen if any of our servers are in a country outside of the EEA or one of our service providers is in a country outside of the EEA. If we transfer or store your personal data outside the EEA in this way, we will take

steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the GDPR. If you use our services while you are outside the EEA, your personal data may be transferred outside the EEA in order to provide you with these services.

CHANGES TO THIS PRIVACY POLICY

We may amend, modify or replace this Privacy Policy at any time. You should review our Privacy Policy each time you visit our website or provide us with personal information.

NO GUARANTEES

While this Privacy Policy states standards for maintenance of personal information, and while efforts will be made to meet these standards, we are not able to guarantee compliance with these standards. There may be factors beyond our control that may result in disclosure of personal information. Consequently, the Corpus Group offers no warranties or representations as regards maintenance or non-disclosure of personal information.

Contact Information

If you have any questions about this policy or about this site, please feel free to contact us.

For the purpose of the GDPR, we are the data controller and any enquiry regarding the collection or processing of your data should be addressed to our Policy Officer at the contact details below.

If you would like further information about the way we manage your personal information, or if you have a privacy-related complaint, please contact our Policy Officer by mail to:

Policy Officer
Elite 4x4 Darwin
PO Box 330
Coolalinga, Northern Territory 0839
Australia

Or by email to:

accounts@elite4x4darwin.com.au

More Information is Available

More information about your rights and our obligations in connection with your personal information are available from the Office of the Australian Information Commissioner at www.oaic.gov.au.