

PRIVACY POLICY

1. INTRODUCTION

"drivable" (defined below) respects and upholds your rights to privacy protection under the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). We are committed to abiding by the Australian Privacy Principles in all our dealings with personal information of individuals we deal with, including our customers, business associates and dealers.

"Personal Information" is defined as information or an opinion (including information forming part of a database), whether true or not and whether recorded in material form or not, about an individual whose identity is reasonably apparent, or can be reasonably ascertained, from the information or opinion. If the definition of "Personal Information" contained in applicable privacy law changes, references to "Personal Information" in this drivable Privacy Policy will have the meaning in the updated applicable laws.

This drivable Privacy Policy describes how we manage any personal information we have about you. It covers information collected by drivable:

- When you enter information on the drivable website, drivable agent website or approved manufacturer website;
- When a dealer or agent creates a test drive or loan car submission on our platform.
- You request a quote through a drivable agent or approved manufacturer;
- When you visit the drivable website;
- When you become an dealer, user, agent, partner or supplier of drivable;

2. "DRIVIBLE"

"drivable" and "We" means; Formula Vehicle Management Pty Ltd ACN 629 071 647

3. WHAT PERSONAL INFORMATION ABOUT ME DOES DRIVIBLE COLLECT?

drivable only gathers personal information if it is necessary to provide a service to you, or as required by law. drivable may collect the following information about you:

- Name;
- Address;
- Postcode;
- Telephone number;
- Email address;
- Transaction details associated with your drivable subscription, including driver licence, credit card or bank details;
- Information needed to complete a dealer test drive, including drivers licence, secondary ID, address information,
- Any information you have provided to us through customer surveys, including your gender and age, or date of birth;
- Any information you are required to provide to us by law or by agreement; and

If you provide us with personal information about another person (such as a joint vehicle owner), please notify them about the drivible Privacy Policy.

4. HOW DOES DRIVIBLE COLLECT PERSONAL INFORMATION?

drivable will generally collect your personal information directly from you. This may be achieved through your interactions with drivible including interactions via our website, social media applications or internet sites or directly through our agents or partners.

5. WHAT DOES DRIVIBLE DO WITH MY PERSONAL INFORMATION?

In general, your personal information will not be used or disclosed by drivible for a secondary purpose, other than the primary purpose of collection unless:

- You have consented;
- The secondary purpose is related to the primary purpose of collection and you would reasonably expect drivible to use or disclose your personal information for that secondary purpose.

We may **use** personal information about you:

- to assist in providing goods and services to you;
- to provide customer and agent support;
- to notify you regarding vehicle services or repairs;
- to send you information about our products;
- to conduct, and send you, customer surveys;
- for our internal administrative, customer relations, marketing, planning, product development and research requirements;
- for product warranty registration and to conduct product recalls;
- to issue invitations to join focus group studies on drivible products or services, conducted by reputable market research companies;
- to consider an application for a career with drivible;
- for any purpose for which you give your express or implied consent; and
- for any purpose required or authorised by law.

drivable may **disclose** personal information for the purposes described above to:

- Additional drivible entities named in this drivible Privacy Policy and their related entities;
- drivible agents, dealers and business associates (including, suppliers, service providers, professional advisers and their respective agents). The types of business associates drivible may disclose personal information to include:
 - Call centre operators;
 - Direct marketing contractors (e.g dealers' service providers) and social media website providers (e.g Facebook) for the purposes of promoting our products and services to you;
 - Mailing house organisations;
 - Data entry service providers;
 - drivible Premium Roadside Assist and warranty providers;
 - Government Agencies such as law enforcement and Road Traffic Authorities; and

- Customer relationship survey operators.

Where third party service providers are employed they are required to keep your personal information secure and in accordance with the Australian Privacy Principles. They are prohibited from using this information for any other purpose, other than as that directed by drivible or for a purpose that is permitted under applicable laws.

drivable may de-identify information about an individual so that the information can no longer be related to that individual. We may use and disclose de-identified information in the ordinary course of our business. De-identified information may also be aggregated to provide reports on the purchase of drivible products or use of drivible services or for the purpose of providing statistical information to drivible or to third parties.

Where applicable, drivible may manage personal information relying on exemptions within the Privacy Act and applicable Privacy Laws, including provisions in the Privacy Act concerning the sharing of personal information among related bodies corporate.

Some third party service providers that drivible uses to collect and store your information may use overseas servers and data storage providers.

6. SURVEYS

Conduct of surveys, Focus groups

drivable may engage specialist third party market research companies, under strict contractual and confidentiality agreements, to conduct customer experience surveys, or focus groups, on our behalf. Personal information disclosed is limited to the minimum necessary to conduct the survey or to issue an invitation to join a focus group study.

Results of surveys

We may disclose personal information returned in customer responses to Surveys to third parties where you have expressly directed us to take this action. Disclosure is strictly limited to dealer staff and drivible staff who have the prime responsibility of enhancing the relationship we have with you. In all other circumstances, survey results are aggregated together into statistical, non-identifying data.

7. MARKETING

At times, we may use personal information to inform our customers, prospective customers and others with whom we have interactions, about our products and services, events, promotions and special offers that we believe may interest you. Direct Marketing may be delivered to you in a number of ways including without limitation by mail, telephone, email and SMS.

We will only use and disclose your personal information for the purpose of direct marketing where:

- We have collected your personal information directly from you, and you would reasonably expect us to use or disclose your information for that purpose;

- You have consented to us doing so; or
- It is otherwise permitted by law.

You can opt-out of receiving direct marketing at any time by contacting us as set out in Section 8 of this drivible Privacy Policy or by using an opt out or unsubscribe method included in our direct marketing communications to you.

8. HOW TO CONTACT US

You may request access, or to update, the personal information we hold about you by writing to the Privacy Officer. We will take reasonable steps to ensure that your information is correct.

You may also contact the Privacy Officer if you wish to make a complaint about the way drivible has handled your personal information.

You do not have to provide a reason for requesting access but you will need to provide reasonable proof of your identity.

On some occasions it may not be possible for drivible to provide you with all of your personal information, or an exemption under the Privacy Act may apply. For example, drivible may not provide access to information if the information provided would impact the privacy of another individual. In situations where drivible cannot provide access to personal information held about an individual, drivible will tell you why. If we do provide access to your personal information, we reserve the right to charge you a reasonable fee for providing access that we consider fairly represents the effort involved in providing you with the information.

Contact information:

Privacy Contact Officer
drivable
PO BOX 40
Glen Osmond SA 5064

hello@drivable.com.au

If you contact us, and are not satisfied with our response to your privacy-related request, you may contact us to discuss your concerns or lodge a complaint with the Australian Information Commissioner (www.oaic.gov.au).

9. SECURITY

Industry Standards

drivable understands the need for a system of security that protects the privacy of your personal information. We use industry standard security measures to safeguard the personal information that we hold physically and electronically. Our database systems store personal information in secure environments that are designed to safeguard it from misuse, wrongful disclosure, alteration or destruction.

Internet Security

We cannot guarantee the security of information transmitted to us via the Internet, although we use our best endeavours to do so. drivible will not be liable in any way in relation to any breach of security during Internet transmissions of personal information, including any unintended loss, misuse or disclosure of that information.

11. WHERE IS YOUR INFORMATION STORED?

Our application and primary database are hosted on an Amazon Web Services server hosted in Australia, with the latest cyber security frameworks. We also use other cloud services to enhance the service to you and in these cases information about you may be stored overseas if a suitable Australian option is not available.

12. WHO CAN VIEW MY INFORMATION?

The dealer, user, agent, partner or supplier who inputted your information into our system has access to your information in accordance with their privacy policy and procedures. Different security levels are created to protect your information within a dealer or agent, from multiple users but the functioning of those security levels is at the discretion of the dealer or agent. Your information is not shared outside the dealer or agent you have shared your information with.

Select drivible employees, contractors or suppliers may have access to your information to help enhance our system and user experience.

13. DEALING WITH UNSOLICITED INFORMATION

In the event that drivible receives unsolicited personal information that could not have been collected under the Australian Privacy Principles as 'solicited' information, we will destroy or de-identify the personal information as soon as practicable, unless it is contained in a 'Commonwealth record' or it is unlawful or unreasonable to do so.

14. MISCELLANEOUS

This drivible Privacy Policy was last updated on 2 May and remains current until the date it is replaced with another version. drivible may modify and update its Privacy Policy from time to time by publishing it on drivible's websites:

<https://www.drivable.com.au/privacy>;

From time to time we may regard it as necessary to act outside the drivible Privacy Policy. drivible may do so, subject only to any other applicable contractual rights you have and any rights you have under the Privacy Act or other applicable legislation.

WEBSITE POLICY

1. INTRODUCTION

While our website is governed by the principles in the drivible Privacy Policy above, below we provide more specific information in relation to interactions with our drivible websites. This information should be read in conjunction with the drivible Privacy Policy above.

We want you to have the highest comfort level, when visiting a drivible website, and to ensure that our processes will respect and honour your election to disclose or not disclose your personal information to us.

The amount of information that you provide to drivible will depend on the range and number of services that you choose to use from our websites.

If you access our websites from a mobile or electronic device, drivible may collect the following device information including, hardware model, operating system version, unique device identifiers and mobile network information.

2. NORMAL WEBSITE SESSION

In general, you can visit our websites without identifying who you are. However, particular sections on our website may require you to provide personal information including your name, address, email address and telephone number in order that we may provide the services or information you have requested during a website visit.

3. INFORMATION WE COLLECT DURING A NORMAL WEBSITE SESSION

You can visit a drivible website without disclosing any personal information about yourself. During all website sessions we collect and store non-identifying statistical-data such as the pages you visited or downloaded, the name of your Internet Service Provider (ISP), the type of browser and operating systems used to access our site, the date and time you access our site, the website that referred you to us and the pages you visit (click-through). We use this information to aid in the design of the site and the material presented there. In these sessions, drivible collects no personally identifying information.

4. COOKIES

Use of Cookies – Site Experience and Personalisation

Cookies are alphanumeric identifiers that we may transfer to your computer's hard drive through your web browser to enable our systems to recognise your browser and to provide personalised features and content on the drivible website. The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

Additionally, you can disable or delete similar data used by browser add-ons, such as Flash, by changing the add-on's settings or visiting the website of its manufacturer. However, because cookies and add-ons such as Flash allow you to take advantage of the interactive features, we recommend that you leave them turned on if you wish to engage in this experience.

Use of Cookies – Statistical Information

For statistical purposes, we collect information on website activity through the use of 'cookies'. When you visit this website a record of your visit is logged. The following data is supplied by your browser:

- Your IP address and or domain name
- Your operating system (type of browser and platform)
- The date, time and length of your visit to the website
- The resources you accessed and the documents you downloaded

This information on its own does not identify an individual but it does provide us with statistics that can be used to analyse and improve our website. If you do not want cookies to be used, please adjust your browser to disable them.

This information is used by drivible to improve our services. It is never given to any other company for that company's independent use.

5. PERSONAL INFORMATION

Personal information is information that identifies you. drivible only gathers personal information if it is necessary to provide a service to you in accordance with the drivible Privacy Policy, or as required by law. These include but are not limited to name, address, telephone number, email address, transaction details associated with your purchase of drivible products or services, any information you have provided to us through customer surveys and any information you are required to provide to us by law or by agreement.

6. COLLECTION OF PERSONAL INFORMATION

There are instances where drivible requests personal information about you on our websites, to enable the provision of a service or correspondence to you. For example:

- "Contact Us" forms;
- Quote requests via our agents or partners;
- The clicking of links via emails;

In these situations, you will be expressly asked to provide information that personally identifies you or enables us to contact you, plus any additional information necessary to aid processing your request. This information is collected and used to complete your request, and stored in a manner appropriate to the nature of the data.

7. EMAIL AND YOUR PRIVACY

You may choose to correspond with us by email, and in doing so send personal information to drivible.

For example:

- An email message containing comments about a drivible product or service, or purchase experience, or the drivible website itself.

- In these situations, we preserve the contents of emails received by us. We only use that information to resolve the matter raised in the email.

8. SPAM AND OPTING OUT

drivable will not send you unsolicited commercial electronic messages ('SPAM') without your consent and we will only send email promotions or announcements to you if you have previously consented to us doing so.

If you are receiving promotional information about drivible and do not wish to receive this information any longer, you may do so by unsubscribing from our email communication. Alternatively, you can [contact us](#) requesting to be removed from our mailing list or via the methods listed under section 8 of the drivible Privacy Policy.

9. LINKS FROM THIS SITE

The drivible website may link to other websites operated by agents or partners of drivible and to the World Wide Web in general. These sites may or may not have our drivible Privacy Policy and therefore, our drivible Privacy Policy and this Website Policy does not apply to external links or other websites. We encourage you to read the privacy policies of any website you link to from this website.