

POLICY:

The underlying objective of this policy is to protect the privileged stakeholder information our organisation Dwyers collects and processes. The Privacy Amendment (Enhancing Privacy Protection) Act 2012 introduced a number of reforms to the Privacy Act 1988 (Commonwealth). On the 20th December 2001 Dwyers released a privacy policy statement and has been conforming to the NPP guidelines and since the 12th March 2014 conform to the new APP guidelines.

The main reform effective from 12/3/2014 is replacement of the Information Privacy Principles (IPP's) and the National Privacy Principles (NPP's) with the Australian Privacy Principles (APP's).

As our stakeholder privacy is important to Dwyers we are updating our policy document of the 20/12/2001 to include more information on:

- How we collect and handle personal information
- Who we exchange your information with
- How you can access and correct your information, and how you can complain about a breach

These changes will apply wherever we collect, use or exchange our stakeholder information and we will review our obligations for APP entities (organisations) against the APP check list.

DEFINITIONS:

1. **Dwyers** = JJ Dwyer (Wholesale) Pty Ltd
2. **IPP** = Information Privacy Principles
3. **NPP** = National Policy Principles
4. **Effective Date** = 12/3/2014
5. **APP** = Australian Privacy Principles **effective 12/3/2014**
6. **APP Entity** = An entity with an annual turnover >\$3m
7. **OAIC** = Office of the Australian Information Commissioner
8. **Reference web site** = www.oaic.gov.au
9. **Stakeholder** = Customer, Trading Partner, Franchise Partner and Employee
10. **Dwyers Privacy Custodian** = Dwyers Group Privacy contact privacy@dwyers.com.au
(www.dwyers.com.au/privacy-policy)

THE APP ENTITIES CHECKLIST:

1. **APP 1 Open and transparent management of personal information** – Dwyers has systems that monitor new personal data creation and tracks changes to existing data. This is part of an integrated Enterprise Resource Planning software package that manages and creates an audit trail of stakeholder master data.
2. **APP 2 Anonymity and pseudonymity** – It is impractical due to the nature of our business for our stakeholders to transact with us anonymously. However in relation to our Franchise partners and their customer satisfaction surveys these can be completed and submitted anonymously. We also have the options in our master data for our customers to opt out of our direct marketing material.
3. **APP3/5 Collection of personal and sensitive data and notification of collection** – The type of personal information collected by Dwyers:
 - a. **Name, address, drivers licence number and expiry, date of birth**
 - b. **Vehicle history and ownership details**
 - c. **Vehicle purchase details**
4. **APP 4 Dealing with unsolicited personal information** – Dwyers does not deal in unsolicited personal information. Dwyers has an Enterprise Resource Planning software that prevents the receipt of unsolicited personal information.
5. **APP 5 – Notification of collection** – See APP3 above.
6. **APP 6 Use or disclosure** – The main purpose that Dwyers collects, maintains and holds this personal information is as follows:
 - a. **Maintain vehicle service and sales history records**
 - b. **We will share your information with our partner Franchise/Vehicle Manufacturer requirements**
 - c. **Legal/Government requirements collection of relevant fees, duties and taxes relating to vehicle transactions, including ATO Taxation office and Consumer Affairs business licensing authority**

7. **APP 7 Direct Marketing** – Dwyers does use this data for direct marketing but gives its customers the option to “opt out” if they so desire.
8. **APP 8 Cross border disclosure** – Occasionally Dwyers contracts out services to a third party to carry out work that cannot be performed in house. The type of personal information that is utilised in this instance is customer’s name and vehicle details. These 3rd parties conformed to the NPP and Dwyers would ensure that from the 12/3/2014 any potential 3rd party outsourcing would require entity confirmation of compliance to APP.
9. **APP 9 Adoption, use or disclosure of government related identifiers** – At the time of introduction of APP’s Dwyers does not utilise or share in this type of information.
10. **APP 10 Quality of information collected and held by Dwyers** - Dwyers has systems that monitor new personal data creation and tracks changes to existing data. This is part of an integrated Enterprise Resource Planning software package that creates manages and edits stakeholder master data. Dwyers regularly sends our customer satisfaction surveys and utilises this opportunity to validate this data is current. Stakeholder information can be updated at any time by notifying privacy@dwyers.com.au
11. **APP 11 Data security** - Dwyers has systems that monitor new personal data creation and tracks changes to existing data. Data is regularly reviewed and obsolete data is cleansed and removed from the Enterprise data base.
12. **APP 12/13 Data Access/correction** – Individuals can request access to and correction of personal data information by contacting privacy@dwyers.com.au
13. **APP 13 Data correction** – See APP 12

ONETOYOTA NETWORK

Dwyers Toyota is part of the OneToyota network of Toyota organisations in Australia (each a OneToyota organisation), comprising:

- authorised Toyota dealers in Australia;
- Toyota Motor Corporation Australia Limited;
- Toyota Finance Australia Limited;
- Aioi Nissay Dowa Insurance Company Australia Pty Ltd trading as Toyota Insurance; and
- Toyota Western Australia (comprising Prestige Motors Pty Ltd as trustee for the Prestige Toyota Unit Trust and Eastpoint Pty Ltd).

Dwyers Toyota and other OneToyota organisations collect and share with each other customer and guest information to provide you an integrated OneToyota guest experience, such as allowing you to be known across the network regardless of which OneToyota organisation you deal with and to provide you with products, services, information and assistance, respond to your enquiries and help keep your information up to date. Your information may be disclosed to OneToyota network service providers in Australia and overseas for these purposes.

For more information about how Toyota Motor Corporation Australia Limited and Toyota Finance Australia Limited handle your information, please see their combined Privacy Policy at www.toyota.com.au/privacy. The privacy policies of Toyota Insurance and Toyota Western Australia are each also available at that address.

OneToyota Marketing

OneToyota organisations may send you marketing to inform you about products or services, special offers, promotions and events that may be of interest to you. These marketing communications may include joint promotions with promotion partners, and may be sent to you using any contact details provided by you, such as post, phone, email or SMS.

Please note that each of the OneToyota organisations are separate organisations. If you do not wish to receive marketing from one organisation, you can let that organisation know at any time using the contact details in their privacy policy (available on their website or toyota.com.au/privacy) or using the “unsubscribe” or other opt-out function offered by the organisation.

Your consent to receive marketing from a OneToyota organisation will be deemed to be ongoing if you do not opt out when you are offered the opportunity to do so, or unless and until you advise the relevant organisation otherwise.

CONCERNS ABOUT PERSONAL INFORMATION MANAGEMENT BY DWYERS:

Any concerns raised by our stakeholders relating to the collection, use or distribution of their private information can be directed to Dwyers Privacy Custodian.

Potential Areas of ambiguity:

- Please refer to Dwyers Privacy Custodian in the first instance.

Authorised by: **Anthony Dwyer Dealer Principal**.....

Issue Date and Implementation: **2/12/2017**

Policy review: **2/12/2018**

Review Date for potential amendments: as advised by OAIC

References used in this policy:

- Dwyers Privacy Policy statement dated 20/12/2001
- **APP = Australian Privacy Principles effective 12/3/2014** www.oaic.gov.au phone 1300 363 992
- **Appendix A = Dwyers Client Data Management form**
Appendix A

Client Data Management Form - Privacy database update request

This form is to be completed by any staff member receiving a request from one of our clients to modify and or update their information contained within our internal data management systems. Our clients can also use this form to request we update / modify the data the associated manufacturer hold about them if required.

Client Name	Contact Code
Contact Details Numbers/Emails	
Brief summary of concerns / request	

**** Privacy Officer Use Only ****

	RECEIVED	CONTACTED	INTERNAL	EXTERNAL	CLOSED
	Date concerns received by the dealership	Client contact by "Privacy Officer" to clarify concerns and possible resolution	Date internal data management system were updated	Date external / manufacturer data management system were updated (if requested)	Date this concern is considered closed / resolved
Date					
By					
Initials					

Notes