

PRIVACY POLICY

We specialise in sales of second-hand motor vehicles and provide incidental services including test-drive and financing of your purchases (**Services**). We understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our Services to you. In this Privacy Policy **we, us** or **our** means Ichinen Autos (N.Z.) Limited NZBN 9429043380824.

Personal information

Personal information is information about an identifiable individual.

The personal information we collect

The types of personal information we may collect about you include (when you visit our website, purchase our second-hand vehicles or otherwise use our Services):

- your name;
- your contact details, including email address, street address and/or telephone number;
- your date of birth;
- your photo identification including your driver's licence;
- your bank account details;
- information about your financial status including your workplace and salary information, your work rights and visa information, your ownership of housing and your bank statements where you provide such information to us;
- your credit card or other payment details (such as through our third party payment processors);
- your preferences and/or opinions (including your preferences for our products or services that you provide to use when you use our services or website);
- your telephone calls (which may be recorded for training and quality assurance purposes);
- the location and time you used our Services at;
- information you provide to us, including through feedback, customer surveys or otherwise;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- support requests submitted to us and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, your transaction details, the type of browser you are using, the type of operating system you are using,

your connection type, your carrier/operating system, and the domain name of your Internet service provider;

- additional personal information that you provide to us, directly or indirectly, through your use of our Services;
- where permitted by law, any other personal information requested by us and/or provided by you or a third party, such as information about you collected from our vehicle inventory management service provider Motorcentral, data providers, financing providers and credit organisations (including where you request financing for your purchase of our product); and
- any other personal information requested by us and/or provided by you or a third party.

How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you purchase our product, you sign up as a client of our Services, through the 'contact us' form on our website or when you request our assistance via email, our online chat or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such a vehicle inventory management service provider Motorcentral, financing providers and credit organisations, and details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

Collection and use of personal information

Personal information: We may collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our Services, including to provide you with a login;
- to provide our Services to you, including to deliver our products and services to you, and register your test-drive on a third party service Motorcentral;
- to assess your financial status and suitability for financing requested by you in relation to your intended purchase of our product;
- to receive and track repayments under the financing arrangement you enter into with us in relation to your purchase of our product;
- to make a refund for your purchase (where applicable);
- to confirm your identity and process your transactions;
- to enable a third party service provider such as Motorcentral to contact you where necessary concerning their services;
- to contact and communicate with you about our Services, including in response to any enquiries you make with us;

- for internal record keeping (including to build our customer database), administrative, invoicing and billing purposes;
- for analytics (including for analysis of data collected from our website concerning visits and activities of users), compare information for accuracy and verification purposes, compile or analyse statistics relevant to the operations of our business, market research and business development, including to operate and improve our Services and associated applications (for example, by personalising your experience online);
- to run promotions, competitions and/or offer additional benefits to you;
- to enable you to subscribe to mailing lists and newsletters;
- for advertising and marketing, including to send you promotional information about our products and services, functions, events or activities, and other information that we consider may be of interest to you, noting we will comply with all laws that are relevant to marketing (including the *Unsolicited Electronic Messages Act 2007* and *Fair Trading Act 1986*);
- to protect our property, the website and/or our legal rights including to create backups of our business records;
- to manage risk and protect our website from fraud (including by verifying your identity) and to detect and prevent fraudulent use of our Services;
- to comply with our legal or regulatory obligations and resolve any disputes that we may have, including to investigate breaches of or enforcement of any legal terms applicable to our website;
- if you are a contractor of ours, or an employee of ours in New Zealand, to manage our working relationship with you and pay you for your services; and
- if otherwise required or authorised by law.

Disclosure of personal information to third parties

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, to us, including (without limitation) vehicle inventory management service providers such as Motorcentral, financing providers, credit organisations, IT service providers, data storage providers, web-hosting and server providers, debt collectors, couriers, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;

- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time) or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Google Analytics: We have enabled Google Analytics Advertising Features including Remarketing Features, Advertising Reporting Features, Demographics and Interest Reports, Store Visits, Google Display Network Impression reporting etc. We and third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device

Overseas disclosure: Where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of New Zealand, which may not have an equivalent level of data protection laws as those in New Zealand. Before disclosing any personal information to an overseas recipient, we will comply with Information Privacy Principle 12 and only disclose the information if:

- you have authorised the disclosure after we expressly informed you that the overseas recipient may not be required to protect the personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act;
- we believe the overseas recipient is subject to the Privacy Act;
- we believe that the overseas recipient is subject to privacy laws that, overall, provide comparable safeguards to those in the Privacy Act;
- we believe that the overseas recipient is a participant in a prescribed binding scheme;
- we believe that the overseas recipient is subject to privacy laws in a prescribed country; or
- we otherwise believe that the overseas recipient is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act (for example pursuant to a data transfer agreement entered into between us and the overseas recipient).

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this

Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. You also have the right to contact the Office of the New Zealand Privacy Commissioner.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Links to other websites

Our Services may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Privacy Officer at:

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