

In this Privacy Policy, “ORIX”, “we”, “us” and “our” mean ORIX Australia Corporation Limited and our related companies. Those related companies may also have their own privacy policies which set out additional detail or differences in their privacy practices.

All terms defined in the *Privacy Act 1988* (Cth) (**Privacy Act**) have the same meaning when used in this Privacy Policy.

This Privacy Policy applies to our handling of your personal information. ORIX has always respected the privacy of individuals. We understand that when you give ORIX your personal information you expect us to preserve its privacy and to implement reasonable safeguards to keep it secure.

This policy sets out:

- the kinds of personal information we collect;
- how we collect and hold personal information;
- why we collect personal information;
- how we use and disclose personal information;
- how you can access and seek to correct the personal information we hold about you;
- whether we disclose your information to overseas entities; and
- how you can complain if you think we have breached this policy or the Australian Privacy Principles.

This Privacy Policy applies in addition to the ORIX Credit Reporting Policy. We recommend that you read this Privacy Policy in conjunction with ORIX's Credit Reporting Policy which can be accessed on our website: <http://www.orix.com.au>.

We may review and update our Privacy Policy from time to time. This will include taking into account new laws, regulations, practices and technologies. All personal information held by us will be governed by our most recent Privacy Policy.

### **What personal information do we collect and hold and how do we collect it?**

During the course of conducting our functions and activities (which include vehicle and equipment leasing, vehicle rental and fleet management) we collect, hold, use and disclose personal information about individuals who are or who are proposed to be:

- customers or guarantors under leasing agreements, hire purchase agreements, chattel mortgages, fleet and vehicle management agreements and rental agreements with ORIX (if the customer or guarantor is a corporation this includes directors and beneficial owners of that corporation);
- drivers or nominated custodians of vehicles leased or hired from ORIX or managed by ORIX;
- third parties to insurance claims that involve us or one of our customers;
- contractors or suppliers of vehicles, goods and services to ORIX or to one of our customers or intending customers;
- visitors to our premises or the premises of our customers or suppliers;
- solicitors, valuers, auctioneers or other professional consultants engaged by us;
- referees of our contractors, suppliers, customers and our customer's guarantors;
- purchasers of vehicles or equipment owned by us;
- finance brokers, introducers or other intermediaries engaged by us; and
- applicants for employment with us.

Generally, we collect personal information directly from the individual to whom the information relates (or from their employers, appointed agents or intermediaries). However, sometimes it is collected from third parties including:

- sources with a connection to the individual (for example, the individual's employer, or referee or recruitment agent);
- our customers or their directors, principals or employees;

- guarantors or proposed guarantors of customers;
- insurance providers (for example, if payments are being paid for by a novated lease protection insurer);
- finance brokers, introducers or other intermediaries;
- credit reporting bodies;
- credit providers;
- mercantile and other agents;
- publicly available sources of information; and
- government departments, authorities and agencies.

The kind of personal information that we collect and hold about an individual will vary considerably depending on the reason for its collection, including the nature of the individual's arrangements or relationship with ORIX and the individual's connection with the arrangements. The personal information collected and held (depending on the purpose of collection) might include (but is not limited to):

- name, address and contact details;
- date of birth, and driver's licence particulars and other information to verify an individual's identity;
- employment, credit and business history;
- information about products or services that an individual has requested or that we provide the individual or their employer;
- driver infringement history (captured during the course of our fines management service) and other driver usage information (including the use and location of tolls, use of fuel and fuel cards, and other driving data);
- "telematics" data captured about vehicles and vehicle drivers (including information as to location, performance, routes taken, vehicle specifications and speed and other driving infringements);
- photographs and other biometric data;
- payment (including credit card) details used to purchase our products or services;
- financial position and information, income and financial commitments;
- credit information (further information about our handling of credit information is set out in our Credit Reporting Policy); and
- any information we consider relevant to assessing and considering applications for employment, including information contained in letters of application and resumes and employment history.

Occasionally, we might also collect sensitive information about an individual, such as health information. We will only do this if the individual consents and only if it is reasonably necessary for ORIX to provide the individual with the product or service they have asked for or otherwise carry out our functions and activities (such as when payments are being made by a novated lease protection insurer, or when an individual is negotiating payment relief with ORIX).

We may also collect personal information (including health information) as part of our COVID-19 response for the purposes of contact tracing, complying with any regulatory requirements in relation to COVID-19 and minimising the potential harm to our employees from COVID-19.

Where we engage with an individual multiple times over a short period in relation to the same matter, we may not provide the individual with a separate notice about privacy each time we engage with that individual.

### **Collecting personal information from our apps, websites and customer portals**

We may also collect personal information through our apps, websites, customer / supplier portals and log-in systems at our premises. Personal information may also be collected by our third party services providers who assist us in operating our apps, websites, portals and log-in systems.

#### *Website analytics*

We use website analytics such as **Google Analytics** to help analyse how people use our websites. Website analytics generate statistical and other information about website use by means of cookies,

which are stored on users' computers. The information generated is used to create reports about the use of ORIX's websites. We may also share website analytics with third parties engaged to provide or update our websites.

In the case of Google Analytics Google will store this information. ORIX will not (and will not allow any third party to) use website analytics to track or collect any personal identifiable information of visitors to our websites. We will not associate any data gathered from our websites with any personal information from any source as part of our use of website analytics.

If you do not want your website data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <http://tools.google.com/dlpage/gaoptout>.

#### *Cookies*

Like many websites, our website and mobile applications may use “cookies” from time to time. Cookies are small text files that are sent to a user's device (phone or computer) by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our website and through our mobile applications.

Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our website or click through an email we send you, a cookie may be downloaded onto your device.

Cookies may also be used for other purposes on our website but in each case none of the information collected can be used to personally identify you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

#### *Third party content (for example, social media links)*

Some of the content on our websites may include applications made available by third parties, such as social media buttons or links that allow you to share content or links to our websites through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties through your interaction with the applications (sometimes even if you do not interact directly with them). We are not responsible for the technical operation of these applications or the collection and use practices of these third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.

### **Why do we collect and hold personal information?**

ORIX collects and holds personal information to conduct our functions and activities, including to market and sell our products and services, and so that we can:

- provide our customers (or their directors, principals or employees) with vehicle leasing, equipment leasing, novated leasing, vehicle rental, fleet management services and any other of our products and services they might request, including assessing and considering applications and guarantors for these products and services;
- verify customers in accordance with our “Know Your Customer” process;
- manage the facilities, the vehicle leases, hires and delivery of services connected with our leasing, fleet management, etc;
- assess whether to engage applicants for employment and contractors and manage employment relationships;
- appropriately identify parties ORIX contracts with for goods or services (including suppliers and consultants) and manage the supplier relationship;
- comply with our legal and regulatory obligations (including those relating to health and safety generally and COVID-19 specifically); and

- carry out related activities.

If we are not able to collect the information we seek we will not be able to provide requested products and services.

### Marketing

From time to time, ORIX may also use and disclose the personal information we collect to let our customers know about products and services that might be of interest to them, including by direct marketing. You consent to us using your personal information for sending you information, including promotional material, about ORIX or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.

If at any time you wish to stop receiving these types of notifications, please let us know by:

- clicking the "Unsubscribe" link in a direct marketing email that you have received from us; or
- contacting our Privacy Officer the contact details of whom are shown below.

### What do we do with the personal information we collect?

We use the personal information we collect for our functions and activities, which may include the following:

- to identify you (if you are a customer, supplier, guarantor, proposed guarantor, driver of a leased/hired vehicle or a purchaser of a vehicle);
- to assess and consider applications for vehicle or equipment leasing, novated leasing, vehicle rental and fleet management services – your involvement in the application for one of these products or services might be as the applicant/customer, a proposed guarantor for the applicant/customer or if the applicant/customer (or proposed guarantor) is a corporation, as a director, principal, beneficial owner or employee of that corporation;
- to provide and manage the vehicle or equipment leasing, novated leasing, vehicle rental and fleet management services. This includes delivering and managing lease vehicles, managing our accounts (including the recovery of money, vehicles and equipment), managing vehicle registration, managing fines, tolls and fuel cards on your behalf, the maintenance and repair of vehicles and equipment, disposing of vehicles, issuing and managing fuel cards and arranging insurance;
- to collect, process and manage payments for our products and services;
- to manage insurance and accident claims;
- if you are an employee or other representative of a customer to which we provide our products and services or a supplier or service provider to us, to communicate with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy;
- to obtain and use credit information and credit reporting information as specified in our Credit Reporting Policy;
- to provide and manage our websites, mobile applications, and customer and supplier portals;
- to personalise and customise your experience on our website;
- to help us research the needs of our customers to market our products and services with a better understanding of the needs of our customers, and for the purposes of improving existing products or services or creating new products or services;
- if applicable, to carry out checks on the Personal Property Securities Register (PPSR) (which may involve a disclosure to the PPSR operator or an intermediary in the course of accessing the PPSR), including to confirm your details where you have applied for credit;
- to enable us to comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing legislation which might include identifying a customer's beneficial owner; and
- to enable us to comply with our obligations under the Modern Slavery legislation.

We may sometimes disclose personal information to third parties outside of ORIX. This disclosure will either be for one of the purposes for which the information was collected, related purposes, purposes to which you have consented or to allow us to comply with an Australian law that requires us to disclose personal information. External parties we may disclose personal information to include:

- credit reporting bodies which include Equifax Australia Information Services and Solutions Pty Limited and Illion Australia Pty Limited;
- other credit providers;
- securitised lenders to ORIX;
- our brokers, introducers, agents, auditors, solicitors and other professional consultants;
- suppliers (including for vehicles, equipment and vehicle servicing), service providers, insurers, repairers and contractors (including tow truck operators);
- trade, commercial / mercantile agents and auctioneers;
- insolvency practitioners (for example, bankruptcy trustees, administrators, receivers, liquidators);
- insurers, insurance brokers, insurance assessors and inspection agents, and investigators;
- vehicle registration authorities, toll operators, state debt recovery authorities, motor clubs, emergency breakdown assistance providers and similar;
- government departments or agencies (where required or authorised by law); and
- our customer's guarantors or proposed guarantors.

You consent to ORIX using your personal information in the ways specified in this Privacy Policy.

We may otherwise collect, use or disclose your personal information:

- in accordance with this Privacy Policy or any agreement you enter into with us; or
- as required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act.

### **Overseas disclosure of personal information**

Some of your personal information may be transferred, stored, processed or used, interstate within Australia, or overseas, by us or by third party service providers. This may happen if we outsource certain activities overseas or if transactions, information, services or products have an interstate or overseas connection. You consent to the collection, use, storage, and processing of your personal information within and outside of Australia.

In addition, we sometimes disclose personal information to related corporations of ORIX within Australia or overseas who may use that personal information in connection with ORIX's functions and activities. Mostly the recipient would be ORIX's New Zealand subsidiary (ORIX New Zealand Ltd) or its parent company in Japan (ORIX Corporation), but it may include our related corporations in other countries from time to time.

Therefore, your personal information may be disclosed to third parties which may receive, store and use your personal information in New Zealand and Japan, and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy. In these circumstances, you consent to the collection, use, storage and processing of your personal information in those countries, without us being responsible under the Privacy Act for such use (or for any breach). Where such parties are located overseas, you may have rights to enforce their compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

### **How can you access or correct the personal information we hold about you?**

If you wish to know about, or have access to, the personal information ORIX holds about you, you can request this by contacting the ORIX Privacy Officer (contact details below). Except where the information sought is not readily accessible, there will not be any charge for granting you access.

There are circumstances in which we may decline to provide you access to the personal information we hold about you and if this happens we will notify you of this and also your rights with regard to complaining about our refusal.

We take reasonable steps to ensure that any personal information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information as requested. If you believe or become aware that some of the personal information we hold about you is incorrect or requires updating (for example your address or contact details), you can and should notify us of the correct information by contacting the ORIX Privacy Officer, the contact details of whom are shown below.

### **How do we hold personal information?**

We take reasonable and appropriate measures to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

We use and employ appropriate systems, security measures, techniques and processes for both hard copy and digitally recorded and stored information.

### **How can you complain if you think we have breached this policy or the Australian Privacy Principles?**

If you think we have breached your rights under the Privacy Act (in particular the Australian Privacy Principles) or we have not abided by this Privacy Policy you can make a complaint to ORIX's Privacy Officer, the contact details of whom are shown below.

It would assist us to respond to your complaint promptly if it is made in writing. Please detail all information relevant to your complaint.

The ORIX Privacy Officer will acknowledge receipt of your complaint within 7 days of its receipt and respond to your complaint within 30 days of its receipt.

#### **ORIX Privacy Officer's Contact Details**

Mail: Locked Bag 2068, North Ryde NSW 1670      Phone: (02) 9856 6414

E-mail: [privacy@orix.com.au](mailto:privacy@orix.com.au)

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