

RAC Go Privacy Policy

About this Privacy Policy

Your privacy and the privacy of your personal information are very important to us and this policy outlines how we collect, use and disclose your personal information.

The Royal Automobile Club of Western Australia Inc (ABN 33 212 133 120) and its related and subsidiary companies, including companies such as RAC Insurance Pty Ltd, and businesses not using RAC as their primary brand, collect and handle your personal information in accordance with the Australian Privacy Principles (APP's), under the Privacy Act 1988 (Cth).

For the purposes of this policy, the term "RAC", "we" or "us" means either The Royal Automobile Club of Western Australia Inc and its related and subsidiary companies, or any one of those entities, as the case may be, unless otherwise noted.

By providing your personal information to us, you agree to our collection, use, and disclosure of your personal information (including sensitive information such as health information) in accordance with this privacy policy.

If you do have any questions or concerns about privacy please speak with one of our Sales and Service Consultants at any RAC Member Service Centre, call 13 17 03 or write to us.

What is personal information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.

What is sensitive information?

Sensitive personal information includes information or an opinion about matters like your health, criminal history or racial or ethnic origin.

Information collected by RAC Go App

We collect information about your activity in the RAC Go App (App), which we use to provide you with the services, including features which are meant to personalise your experience and for our product and service research and development. Such is based upon your consent by enabling permissions and by completing optional fields when you first access the feature. The activity information we collect may include:

- **Location:** Real-time location data based on information provided by your device operating system ('OS') to detect travel and route information.
- Motion & Fitness: Your accelerometer data and gyroscope data to detect motion in your vehicle. Depending on your device make and type and your permissions this may also include activity information, step detection and step count.
- Interactions: Your interactions with the app and its content, such as type of device, type of OS, type of mobile browser, information on your use of the Application.
- Other contextual information: Such as your vehicle registration or RAC Membership number.

How we collect your personal information

Many of our products and services require you to give us personal information such as your name, address, telephone number, email address and credit card number, either to store within your member account, or to help us or third party agents, contractors or organisations engaged by us to provide to you our products or services.

We normally collect personal information directly from you over the phone, face-to-face in an RAC Member Service Centre or agency, through the mail using paper application forms or electronically over the internet, through RAC mobile apps or other communication tools. However, in some circumstances, we collect personal information from a third party.

RAC also obtains personal information through the use of website analytics tools, on where, when and how you use our products and services and to authenticate your access to products and services from us and our service providers and agents.

If you wish to know more general details about the personal information that we collect, please speak with a Sales and Service Consultant at any RAC Member Service Centre or call $\frac{13 \ 17 \ 03}{12 \ 17 \ 03}$.

What if you choose not to provide us with personal information?

Where practical we will give you the option of not identifying yourself, or using a pseudonym, when dealing with us. However, the nature of our business may mean that, if you do not provide us with the personal information we need, we will be unable to administer and manage the product or service that you wish to purchase. We will also be unable to assess your application, where one is required, for example to purchase an insurance policy or arrange a personal loan. We will advise you if your failure to provide personal information may jeopardise your application.

How we use and disclose your personal information?

We use your personal information in the course of administering and managing the products or services you have with us, including for marketing and promotional purposes and dealing with any complaints or claims.

We may need to disclose some of your personal information to other people or organisations who assist us to provide you with products and services. This may include entities within the RAC or third party agents, contractors or organisations.

The entities to whom your information may be disclosed include (but are not limited to):

- If you are an RAC member RAC Roadside assistance contractors, automotive repairers, Australia Post, or another Australian Automobile Club;
- If you purchase a policy through RAC Insurance Service providers such as repairers and suppliers, external claim assessors, reinsurers, or other insurance companies;
- If you have purchased a loan or investment product through RAC Finance credit reporting bodies, other credit providers, insurers, solicitors, accountants or other professional advisers;
- If you have purchased a travel product through RAC travel airlines, car rental companies, tour operators, or accommodation establishments;
- If you have purchased an RAC security product suppliers and installers of alarms, alarm monitoring specialists, security patrol companies, or WA Police Service.

RAC may disclose your personal information to market research companies to gather independent feedback from you about the performance of the RAC, our contractors and our products and services.

RAC and our business partners may use cookies, tracking and other information gathering technologies:

- to help deliver, optimise, personalise and analyse our products, services, and for advertising purposes.
- analyse trends and your use of the website and other technologies and how you respond to any advertising or content.
- serve targeted advertising to you via our website or other technologies on the basis of your use and preferences.
- administer products and services and gather demographic information about your use of the website and other technologies in order to target and personalise advertising and offers to you.

When you use a link from our website(s) to the websites of third parties, those websites are not subject to RAC's privacy and security standards. Those third parties are responsible for informing you of their privacy policies.

Security

We maintain commercially reasonable standards and take all reasonable care to prevent unauthorised access to your personal information, and to protect the security of your personal information when transmitted over the internet.

No data transmission over the internet can be guaranteed as fully secure and therefore we cannot guarantee or warrant the security of any information you provide to us. You submit information at your own risk.

The organisations that we may disclose your personal information to are subject to and are bound by appropriate contractual safeguards governing how they use your personal information. Also, within the RAC and our third party suppliers, we share information to help us provide you with more efficient service and to keep you informed about RAC and other non-branded products and services. Please contact us if at any time if you have any questions or concerns around this.

Direct Marketing

We may use your personal information to conduct direct marketing, such as telemarketing and advertising via email, SMS or post, in order tell you about RAC and other non-branded products and services.

The type of personal information we use or disclose will depend on the product or services being offered, but will usually be limited to your name and contact details. Importantly, we will not use any sensitive personal information for marketing purposes without your express consent. We do not sell, trade, lease or rent any personal information we obtain without your prior express consent.

Your personal information may be passed to other entities (including third party entities) for promotional purposes, including direct marketing. Those entities may use the personal information we provide to them to market to you, including by sending you information or contacting you (by telephone, post or electronically) about RAC, RAC branded third party products or services or non-branded products and services. These entities may be associated with Us, operate under the RAC's Brand or be third party agents, contractors or organisations.

You may choose to opt out of our marketing activities at any time by advising us via the unsubscribe function or other contact information provided in any marketing you receive. Alternatively, you may advise us by speaking to one of our Sales and Service Consultants at any RAC Member Service Centre, or calling us on 13 17 03.

Transferring your information overseas

Sometimes our third party agents, contractors or organisations are based overseas, or otherwise have data storage facilities overseas where your personal information will be stored. We may transfer information about you between countries if required for a relevant purpose described above.

We will take reasonable steps to ensure all overseas entities to whom we transfer your personal information do not breach the Australian Privacy Act 1988 (Cth) and APP's, including ensuring commercially reasonable and industry standard security measures are taken by those entities to protect your personal information from unauthorised access and use.

Can you get access to view and correct your personal information?

Generally, you have the right to know all the personal information we hold about you. You can also request they we correct any personal information we hold about you. You can request access to view and/or correct this information by:

- Calling 13 17 03. We will ask you questions so that we can identify you over the phone.
- Writing to RAC addressed to the Privacy Officer, GPO Box C140, Perth WA 6839 and providing us with details of what you would like to know, see or correct.
- Calling in to your nearest RAC Member Service Centre and providing us with appropriate identification.

In circumstances, we may refuse you access to your personal information and if this occurs, we will write to you to explain our reasons.

Some examples of when you might be denied access are if:

- access will pose a threat to the life or health of someone;
- access would have an unreasonable impact on another person's privacy;
- information relates to anticipated or existing legal proceedings; or
- giving access would be unlawful.

How will we handle your request for information?

We will respond to your request as quickly as possible and we will provide you with a written, verified copy of your personal information that we hold. Depending on the nature of your request and the accessibility of the information (for example, information may be archived), we will aim to respond within ten working days, but may be able to respond sooner than this. If it will take us longer than this to access your personal information, then we will inform you of the delay and the reason for the delay.

Contacting us with questions or complaints

If you are concerned with RAC's use of your personal information or any aspects of this Privacy Policy, please contact us and we will endeavour to resolve your enquiry by following our internal complaint resolution process. You can contact us by:

- Calling 13 17 03. We will ask you questions so that we can identify you over the phone.
- Writing to RAC addressed to the Privacy Officer, GPO Box C140, Perth WA 6839 and providing us with details of what you would like to know, see or correct.
- Calling in to your nearest RAC Member Service Centre and providing us with appropriate identification.

If the matter cannot be resolved to your satisfaction, it will be referred to the relevant Manager, who will contact you within five working days.

If the complaint is still unresolved, it will be referred to the General Manager, who will advise you of our final decision within fifteen days of the date you first made the complaint.

What if your complaint remains unresolved?

If you are not satisfied with the resolution of our complaint you are entitled to contact the Office of the Australian Information Commissioner at:

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Phone toll free: <u>1300 363 992</u>

TTY: <u>133 677</u> then ask for <u>1300 363 992</u>

Email: enquiries@oaic.gov.au

Changes to this Privacy Policy

We will review this policy from time to time to make sure it's up-to-date. If we make changes, we'll post the latest version here.

This Policy was last updated on: 08 February 2023