



# Privacy Charter

## 1. Introduction

Protecting your privacy is important to RACV. This Privacy Charter explains how we collect, handle and safeguard your personal information. It applies to all the businesses within RACV, including Royal Automobile Club of Victoria (RACV) Limited and R.A.C.V. Finance Limited (**RACV Finance**).

In this Privacy Charter, all terms defined in the Privacy Act 1988 (Cth) (**Privacy Act**) have the same meaning when used in this Privacy Charter.

## 2. What sort of personal information do we collect and hold?

The kind of personal information we collect and hold about you depends on the circumstances of collection and the nature of your dealings with RACV.

The personal information we collect and hold about you and other individuals (such as a co-insured, co-borrower, additional driver or a spouse, partner, children or travelling companion) can include: names; dates of birth; contact details such as addresses, telephone numbers, and email addresses; vehicle details such as your vehicle type, fuel type, Vehicle Identification Number (**VIN**) and registration details such as plate number, date of transfer and renewal date; property details (including information about your energy needs); information about products and services you currently hold; details of your previous insurance and claims; salary and personal finances; travel plans; identity document details (such as your passport or driver licence details); information contained in call recordings; credit card and bank account details; and information related to your usage of RACV products and services and your interactions with RACV online, including location data, past and present online activity and your IP Address. In limited circumstances, RACV may also collect your tax file number. RACV deals with tax file numbers in accordance with specific guidelines under the Privacy Act.

RACV Finance, a credit provider, may collect and hold personal information (including credit information and credit eligibility information) relevant to the credit-related services provided or that RACV Finance has been requested to provide, including: information about a customer's or applicant's financial position, such as details of assets and liabilities, details of income and proof of financial position; credit card balances and

limits; information about repayments and whether they were made on time; publicly available information; information about credit worthiness and eligibility for credit from credit reporting bodies and other credit providers; default information and when the default has been paid; information about an application for credit with us including the type and amount; any new arrangements with us because of a default; any serious credit infringements; and any other types of credit information and credit eligibility information included in credit reports we obtain from credit reporting bodies.

RACV Finance also derives certain information from credit reports including information developed and used to form a view on your credit worthiness; and information developed based on credit reporting information that is used to generate an internal risk profile for you in connection with your credit application.

RACV Finance may also collect information that it requires to identify customers, including as required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), which may include details or copies of passports, driver's licences, utility bills or other documentary evidence of the applicants' identities.

If you deal with RACV in some other capacity, we may collect your name and contact details and any other information you choose to provide to us. We may also collect details of the interactions you have with RACV.

In some instances, we may collect images of you or from which you can be identified, including if you provide us with photos or where your image is captured via security or other surveillance devices on RACV premises or in our vehicles or vehicles of our contractors.

If you provide RACV with personal information about another person, please make sure that you tell them about this Privacy Charter.

RACV only collects sensitive information about you with your consent (unless we are otherwise required or authorised by or under law to do so). Sensitive information includes health information and information about a person's race, ethnic origin, political opinions, membership of political, professional or trade associations or a trade union, religious beliefs and criminal history.

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

We collect personal information directly from you in various ways, including: over the phone, in person, when you visit, use or communicate with RACV through our websites, mobile applications, social media sites and other digital platforms including through cookies (**Digital Platforms**), and in writing.

Occasionally other people or entities might give RACV personal information about you. For example, we might be given your information by your co-insured/borrower or your

spouse, partner, parent or guardian. We may also collect your personal information from the business partners we work with (including VicRoads) and the contractors who provide you with services on our behalf (such as energy service providers and tradespeople), and from publicly available sources (for example, public registers and social media). RACV Finance may collect personal information (including credit information) from third parties such as credit reporting bodies and credit providers, government authorities and other entities within RACV. RACV Finance may also collect publicly available information from media sources.

When you contact us to obtain a quote for home insurance, we may collect information about the property you wish to insure and share the details of that property with our partners where it may be combined with other data they may hold about the property. Your personal information does not form part of the property information that is shared.

If you are a member or a customer, please be aware that your use of our Digital Platforms may not be anonymous. If you give us feedback online, we may reach out to you to discuss your feedback even though you may not have logged in to your online account.

### **Log information, cookies or web beacons**

RACV uses standard digital tracking features called “cookies” (small text files stored in a user’s browser) or web beacons (electronic images that allow the website to count visitors who have accessed a particular page and to access certain cookies) on our Digital Platforms to help us improve your experience. We or our service providers may also use cookies or web beacons to collect aggregate data.

We use the following types of cookie, as will your browser:

- **Analytics cookies** that remember your computer or mobile device when you visit our Digital Platforms. They keep track of browsing patterns and help us to build up a profile of how you use our Digital Platforms. We use that information for customer analytics and to serve advertisements or content that we think might be of particular interest to you on our and other Digital Platforms. Your browser may use similar cookies for similar purposes and to serve advertisements for others. RACV uses Google Analytics advertising features and Google Signals (a cross-device identifier). One of the features enabled allows the ability to build remarketing audiences based on site behaviour and share to the Google Marketing Platform. Google Analytics Demographic and Interest reporting is also enabled and allows RACV to integrate demographic and interest data in Analytics reports, and to create audience segments using demographic and interest data.

- RACV also uses **1st Party Cookies** (such as the Google Analytics cookie), other first-party identifiers, 3<sup>rd</sup> party vendor tracking cookies (such as Google Advertising cookies) and other third-party identifiers together to perform remarketing activity and to advertise RACV services and products across the Internet. The third-party vendors whose services RACV uses, will place cookies on web browsers in order to serve ads based on past visits to our Digital Platforms. These third parties (such as Google and Meta) use these technologies to collect user information in order to perform ad measurement services and target ads on our behalf.
- **Service cookies** that help us to make our Digital Platforms work as efficiently as possible; remember your registration and login details; remember your settings preferences; and to detect what device you are using and adapt how we present our services according to the screen size of that device.

If you have given us your consent to use your information for marketing purposes:

- We may use your previous interactions with us, including with our Digital Platforms, to tailor your experience when you return, including to present you with content we believe is of interest to you;
- Information collected using analytics cookies may be combined and analysed with other personal and product information held by RACV to send to you communications (including marketing) by various channels (e.g., SMS, email, direct mail, telephone). We may also use these insights to decide which advertisements or offers might be of particular interest to you when you visit or contact us, including our Digital Platforms.

We constantly review developments in relation to digital technologies and may make changes to how we use such features. We endeavour to keep information in this Privacy Charter about how we use digital tracking features up to date.

### **Disable Cookies or Opt Out of online advertising**

You may choose to disable cookies in your browser or use security software to prevent the storage of cookies. However, if you disable cookies, we may not be able to fulfil your request or provide you with an appropriate level of service in some areas.

If you do not wish to participate in Google Adwords Remarketing, you can opt out by visiting Google Ad's Preferences Manager <https://adssettings.google.com>. You can also opt out of any third party vendor's use of cookies by visiting <http://optout.networkadvertising.org>.

### **Google reCAPTCHA**

RACV uses reCAPTCHA which is a free service from Google that helps protect our Digital Platforms from spam and abuse by blocking automated software. It does this by

collecting personal information about users to determine they're humans and not spam bots.

This collection of personal information is subject to Google's privacy policy, for a copy please visit: <https://policies.google.com/privacy>. By using the reCAPTCHA service, you consent to the processing of data about you by Google in the manner and for the purposes set out in Google's privacy policy.

### **3. The purposes for which RACV collects, holds, uses and discloses personal information**

#### **To provide you with the products and services you want**

We use and disclose your personal information (including credit information and credit eligibility information) to: assess and process your applications for RACV products and services; to arrange, provide and monitor the products and services you have requested, including roadside assistance and insurance; to assist you when you apply for an insurance quote; to administer and manage your RACV membership (including the records associated with your membership); and provide you with your benefits (including any discounts on our products or services, or those of our third party partners, that you may be eligible for). This includes: using your information to perform administrative functions such as receipting; billing and handling complaints; and to confirm vehicle ownership for processing of product refunds and requests to change nominated/eligible vehicle. In some circumstances we may need to share your personal information with third parties to ensure we have accurate and up to date information and may also need to use your information to verify your identity.

RACV Finance also collects, holds, uses and discloses credit information and credit eligibility information for the purposes of: credit scoring and risk assessment; assessing your suitability as a borrower, co-borrower or as guarantor for a loan (if applicable); and assisting you to avoid defaulting on your loan or lease.

#### **To deal with enquiries and complaints**

We may need to collect your personal information and use or disclose it to answer an enquiry you make or respond to a complaint made by you in respect of a product or service.

#### **To provide you with information about RACV products and services which we believe may interest you**

RACV may use your personal information to tell you about other products and services, discounts, special offers, competitions and invitations to special events. This includes administering your participation in any of our competitions or promotions for members that you enter.

Where RACV sends you an offer relating to the products and services of other organisations, we keep control over your information. We do not rent or sell your information to other organisations so that they can direct market to you.

When administering a benefits program, we may collect information about your interactions with Digital Platforms operated by third parties to understand your interest in the products and services they offer. Where we do this, and where we and the third party have your consent to use your information for marketing purposes, we may also disclose your personal information to those third parties so that they may personalise your experience with their Digital Platforms and product and service offerings.

### **Declining product offers ('Opt-Out')**

We recognise the importance of providing you with choices by giving you an easy means to 'Opt Out' from receiving marketing offers. Let us know if you do not want to receive these offers by managing your preferences at [www.racv.com.au](http://www.racv.com.au); contacting us on 13 RACV (13 72 28); or by visiting an RACV shop.

### **Market Research, Product Testing, Surveys and Research and Development**

RACV may contact you from time to time in order to seek your opinion on how we do things, how we want to do things in the future or for your thoughts in relation to public policy issues.

RACV may also use your personal information, and information about the way you use our products and services and interact with RACV, for research and development purposes. This includes monitoring our performance to maintain the quality of our products and services through quality assurance reviews and business reporting.

### **Data analytics**

RACV may conduct data analytics on the personal information you provide and details of your interactions with RACV, to help us develop and improve RACV products and services, our marketing and your RACV experience.

### **Comply with our regulatory requirements**

We may need to use and disclose your personal information to comply with our regulatory requirements.

### **Other purposes**

RACV may use and disclose your information for other purposes required or authorised by or under law (including purposes for which you have provided your consent and as may be described in any privacy collection notice made available to you when you provide us with your personal information).

RACV Finance may also use and disclose personal information (including credit information and credit eligibility information) for the purposes of: deriving credit eligibility information; providing credit reporting bodies with information about you; providing credit references to another credit provider when you apply for credit; recovering overdue amounts you owe us where you have failed to meet your payment obligations to us. With your consent, your personal information may also be disclosed to credit reporting bodies or other approved third parties who are authorised to assess the validity of identification information.

RACV may disclose your credit information to a credit reporting body where you have committed a 'serious credit infringement', or to report defaults (in accordance with the Privacy Act).

If we are unable to collect personal information from or about you and/or you do not provide consent to share your personal information with the third parties identified above, we may not be able to provide our products or services to you, respond to your enquiries, verify your identity or engage in other dealings with or for you.

#### **4. Who we disclose your personal information to**

In conducting our business, we may sometimes need to disclose your personal information within RACV, to our business partners (including the issuers of RACV Insurance products and our travel and experience partners), and contractors and to other third parties, including other roadside assistance organisations. This may include our professional advisors (such as our auditors, accountants and legal advisors, and external consultants who we may engage from time to time) for the purposes of managing our normal business practices and affairs. Where we do this, we will take reasonable steps to protect the privacy of any information that we need to disclose to them.

Some of the products we sell are issued by our business partners, who have their own privacy policies and collection notices. Where relevant, details of how to view their privacy policies may be found in disclosure documents, such as Product Disclosure Statements, or product terms and conditions.

#### **Disclosing your personal information overseas**

RACV may (either directly or through our booking mechanisms) need to disclose your personal information to our partners with overseas venues or locations in order to fulfil a travel booking request that you make.

RACV Finance's loan system service provider uses data storage hubs in Australia. RACV will not, in the normal course of our business, disclose your credit information or credit eligibility information to entities located outside Australia.



In other limited circumstances we may disclose your personal information to third parties overseas who provide services to us. For example, some of our software is maintained by third parties and to ensure we can respond to issues promptly some of those third parties have support services located in jurisdictions other than Australia. While it is unlikely that your information will be disclosed to a recipient located outside of Australia, it is possible that this may be necessary to manage a software issue. In other circumstances your personal information may pass through storage hubs in relation to the services provided to us by third parties and this may be the case even where the third party is operating from within Australia. The countries in which they or storage hubs may be located include:

- Canada
- France
- Germany
- Hong Kong
- India
- Ireland
- Netherlands
- Philippines
- Singapore
- South Korea
- Spain
- United Kingdom
- United States of America

RACV has appointed KPMG as an eligible recipient to receive disclosures under the Whistleblower Protection Laws and uses KPMG's FairCall whistleblower hotline to receive and manage disclosures. Information may be received or stored by KPMG in systems located in Denmark and South Africa. KPMG treat all disclosures in accordance with the [FairCall Privacy Statement](#).

We have taken steps to ensure that our service providers have acceptable security arrangements in place to protect your information.

### **Other disclosures of information**

We may also disclose your personal information to other third parties, including regulatory and enforcement authorities, where we are required or authorised by law to do so (including where you have provided your consent).

### **Sharing non-personal information**

RACV may share aggregated or summary information that does not identify you with our business partners or other third parties.



## Location-based services

To provide location-based services through our applications, RACV and its partners and licensees may collect, monitor, store, use and share location data, including the real-time geographic location of your devices.

## Credit reporting bodies

The law requires us to advise you or otherwise ensure that you are aware of certain 'notifiable matters'.

### Notifiable matters

RACV Finance may provide credit information (including personal information) to the following credit reporting bodies:

1. Equifax: You can receive a copy of the Equifax Credit Reporting Policy at [www.equifax.com.au](http://www.equifax.com.au) or by contacting Equifax at PO Box 964, North Sydney, NSW, 2059. Phone: 1300 762 207
2. You should be aware of the following matters:
  - a. The credit reporting body may include the personal information disclosed by RACV Finance in reports provided to credit providers to assist them to assess your credit worthiness.
  - b. RACV Finance participates in the National Comprehensive Credit Reporting (CCR) Scheme. This means that RACV Finance regularly reports account status information, including repayment information, to the relevant credit reporting body. Further information about the CCR Scheme is available at [www.creditsmart.org.au](http://www.creditsmart.org.au).
3. If you fail to meet your payment obligations in relation to consumer credit you enter with us, or you commit a serious credit infringement, RACV Finance may be entitled to disclose this to the credit reporting body.
4. You are entitled to request that a credit reporting body:
  - a. not use credit reporting information about you for the purpose of pre-screening of direct marketing by a credit provider.
  - b. not use or disclose credit reporting information about you where you believe on reasonable grounds that you have been or are likely to be a victim of fraud.
5. You may obtain a copy of or access our credit information management policy (that is this Privacy Charter) by contacting us.
6. You have the right to request access to the credit information and credit eligibility information that we hold about you and make a request for us to correct the credit information or credit eligibility information if required. Please see "Information quality and your rights of access and correction" below for more information.
7. You can complain to us if you consider we have not complied with Division 3, Part IIIA of the Privacy Act or the Credit Reporting Privacy Code.

## **5. Security of personal information**

We take reasonable steps to protect the personal information (including credit information and credit eligibility information) we hold from misuse, interference and loss, and from unauthorised access, modification and disclosure. This includes using security technology, procedures and employee training to help ensure that your information is protected and secure.

## **6. Information quality and your rights of access and correction**

### **Quality and correction of personal information**

We take reasonable steps to ensure that personal information we collect, use and disclose is accurate, complete, up to date and relevant. You can help us by letting us know about any changes to your personal information, such as your address and phone number.

If you believe that any information, including credit information or credit eligibility information, we hold about you is inaccurate, please contact us. We will take reasonable steps to correct your information, but if we don't correct your personal information we will give you a written explanation as to why.

### **Access**

Please contact us if you would like to access the personal information or credit eligibility information we hold about you. For security purposes, when you contact us to request access to your personal information, you will need to provide us with enough information to enable us to verify your identity. Depending on the nature of your request, we may ask you to complete a form and in some cases we may charge an access fee to cover the cost of retrieving the information and supplying it to you. We will inform you of any relevant charges at the time of your request.

We will generally provide you with access to your personal information (subject to some exceptions permitted by law).

Following receipt of your request, we will provide you with an estimate of the access fee, where applicable (depending on the complexity, the time required to collate the information and the format you need the information to be made available to you in). You can then confirm if you want to proceed. Access will be provided once payment is received. We can usually deal with your request within 14 to 30 days.

To protect the confidentiality and security of your information requested, RACV may provide you with options around access to your information. For example, we may give you the option of collecting your information from an RACV shop. Alternatively, you may elect to receive your information by registered mail.

In certain circumstances we may not be able to tell you all or any of the information we hold about you. In these circumstances we will write to you to let you know why your request has been denied or limited.

## 7. How to make a privacy complaint

Please contact us if you have any concerns or complaints about the manner in which RACV has handled your personal information.

We will review your complaint and respond to you in writing. We will let you know if we require any further information to respond to your complaint. If you are not satisfied with our response, you can contact us to discuss your concerns or take the matter to the Office of the Australian Information Commissioner (**OAIC**).

Further information about complaints to the OAIC can be found here:

[www.oaic.gov.au/privacy/privacy-complaints](http://www.oaic.gov.au/privacy/privacy-complaints).

## 8. How to make a complaint in relation to credit reporting

Please contact us in writing if you have any concerns or complaints about our compliance with our obligations under the credit reporting provisions of the Privacy Act or under the Credit Reporting Privacy Code.

We will acknowledge your complaint within 2 business days and let you know who is responsible for handling your complaint and how we will deal with the complaint.

RACV will endeavour to resolve your complaint within 30 days or any such longer period you agree to in writing.

In the course of our investigation of your complaint, it may be necessary to consult with other credit providers or credit reporting bodies to ensure we fully investigate your complaint.

We will, after investigating the complaint, make a decision about the complaint and give you written notice that:

- sets out the decision;
- states that, if you are not satisfied with the decision, you may escalate the complaint to the Australian Financial Complaints Authority (**AFCA**) or contact the OAIC.

If your complaint relates to how we handled your access and correction request, you may take your complaint directly to AFCA or the OAIC. You are not required to let us try to fix it first.

The contact details for escalating complaints are:

**Australian Financial Complaints Authority**

**Mail:** GPO Box 3, Melbourne, VIC, 3001

**Phone:** 1800 931 678 (free call)

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Website:** [www.afca.org.au](http://www.afca.org.au)

**The Office of the Australian Information Commissioner**

**Mail:** GPO Box 2999, Canberra, ACT, 2601

**Phone:** 1300 363 992

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Website:** [www.oaic.gov.au](http://www.oaic.gov.au)

## 9. Contact us

If you would like more information about RACV's approach to privacy, or if you wish to discuss the information set out in this Privacy Charter, please contact us:

**Online:** [Contact RACV](#)

**Phone:** 13 RACV (13 72 28)

**Post:** Privacy@RACV, Level 7, 485 Bourke Street, Melbourne, VIC, 3000

## 10. Revisions of this Privacy Charter

We may change our Privacy Charter from time to time. If we do so, we will place a notice on our website. Please check for updates and changes.

*Updated July 2024*