



AA Holdings Pty Ltd

ACN 112 233 744  
ABN 94 112 233 744

1<sup>st</sup> Floor, 40 Johnston Street  
Collingwood Victoria 3066  
Telephone 03 9419 1211  
Facsimile 03 9419 5169

## **Privacy Policy and Collection Statement**

### **Introduction**

AA Holdings Pty Ltd ABN 94 112 233 744 and its related entities ('**AA Group** 'we', 'our', 'us') own and operate numerous BP branded retail petrol stations which are operated by a network of independent licensees. AA Group provides a range of goods and services to customers at our petrol stations, either directly or through our licensees.

AA Group regards personal privacy as an important part of our relationship with every person with whom we interact in our business.

Please read and review this Privacy Policy which sets out how we collect, use, store and disclose your personal information.

'Personal information' has the meaning in the Privacy Act 1988 (Cth) and includes information about an identifiable individual, and includes names, addresses, telephone numbers, email addresses, dates of birth and credit and banking details.

When you provide information to us, you agree and consent to the collection, use and disclosure of your personal information in the manner set out in this Privacy Policy.

This Policy applies to AA Group's collection and handling of your personal information. For the avoidance of doubt, it does not apply in relation to personal information collected by our licensees.

This Privacy Policy applies to all personal information that AA Group now holds or may in the future collect. This includes information that you provide when you purchase goods or services, enter a competition or promotion or otherwise submit information to AA Group (such as by filling in a form or responding to a survey). The service stations that are operated by our licensees are responsible for their own privacy practices. Use of personal information by those licensees will be governed by the respective privacy policies of the licensees. Where applicable, AA Group will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the Privacy Act 1988 ('Cth') ('Privacy Act') and any other applicable exemptions in the Privacy Act or other legislation.

### **What kinds of personal information do we collect and how do we collect your personal information?**

We may collect different personal information from you depending on the circumstances in which that information is collected, including as set out below.

We may collect the following types of personal information:

- (a) your name;
- (b) your email address;
- (c) your telephone number and other contact details;
- (d) your credit card information;
- (e) details of the goods you have purchased from our stores;
- (f) if you are employed by our licensees, your date of birth, home address and payroll records; or
- (g) any other personal information that may be required in order to facilitate your dealings with us.

During our relationship with you, we may collect personal information from you. We collect personal information in circumstances including:

- (a) directly from you when you provide personal information to AA Group or its licensees, agents or contractors, for example when you are involved in acquiring goods or services from us or supplying goods or services to us;
- (b) directly from you when you participate in a trade promotion or competition, rewards and loyalty programs, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners from time to time;
- (c) directly from you when you apply for a position (e.g. as an employee or contractor) within the AA Group;
- (d) directly from you when you apply for a position as a licensee;
- (e) when you make an enquiry;
- (f) when you visit our premises (including each of our retail petrol sites and car wash);
- (g) from publicly available sources;
- (h) from our commercial partners and third parties who are involved in providing any benefit, reward or service to you (either directly or on our behalf); and
- (i) via security video and audio surveillance at our sites.
- (j) when paying for goods or services with credit cards;
- (k) when you make a complaint; and
- (l) when you voluntarily submit your personal information to us for any reason.

AA Group may also be privy to the personal information of individuals if such information is incorporated or included in data or files provided by its third-party suppliers.

#### **How will your personal information be used?**

AA Group uses and discloses your personal information and the information you supply in ways necessary for us to operate our business and to provide any goods and services.

We use the personal information collected from you for the purpose it was provided or collected, including the following:

- (a) to supply goods or services to, or acquiring goods or services from, an individual or organisation;
- (b) to provide, maintain, protect and improve our goods and services, and monitor their effectiveness;
- (c) to enhance our range of goods and services;
- (d) to consider you for a position (e.g. as an employee, contractor or licensee) within the AA Group and, if applicable, to subsequently administer and manage the AA Group's engagement or employment of you (including in relation to training, performance management and disciplinary action if required);
- (e) for individuals that are an employee or contractor of any of our licensees, suppliers or customers, to transact with you, your employer or the party that is engaging you as a contractor and to manage our relationship with you, your employer or the party that is engaging you as a contractor, including so that you can access training and for compliance purposes;
- (f) to respond to an enquiry by an individual;
- (g) to administer a trade promotion, competition;
- (h) to maintain security over our premises (including each of our retail petrol station and car wash sites) and systems; and
- (i) to protect our legal interests and fulfil our legal and regulatory obligations (if and to the extent necessary).

We may for analytical purposes use and disclose aggregated and anonymised data that contains no information specific to a particular individual.

We hold personal information in our own secure databases, and, to some extent, for marketing purposes in the databases of third parties engaged by us (subject to obligations regarding privacy and confidentiality) to conduct electronic direct marketing subject to all legislative requirements.

### **Who will your personal information be shared with?**

Companies within the AA Group will share your personal information where necessary to carry out our business functions. The provision of personal information within the AA Group will be in a manner that complies with the Australian Privacy Principles and our Privacy Policy.

We may provide personal information to third parties outside the AA Group for limited purposes, such as to help us in providing goods and services to customers and to carry out and administer competitions, reward and loyalty programs.

Those persons and businesses may include:

- (a) our franchisor, our licensees, employees, consultants, contractors, temporary workers or other representatives;
- (b) prize suppliers and service providers in relation to rewards and loyalty programs, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- (c) our suppliers;
- (d) our sponsors and business partners;
- (e) our professional advisers, bankers and auditors; and
- (f) any other party to whom you authorise us to disclose your personal information.

We may also disclose your personal information to third parties outside the AA Group:

- (a) where we have your express permission to do so;
- (b) where it can reasonably be inferred from the circumstances that you consent to the disclosure to the third parties;
- (c) if substantially all of our assets are acquired by a third party, in which case personal information which we hold about you customers may be one of the transferred assets (subject to the same constraints on use and disclosure as under this policy); and
- (d) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions, to facilitate court proceedings or to protect our rights; or
- (e) to protect the rights, property, or safety of our personnel or customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We do not disclose personal information to businesses located outside Australia.

### **Security of personal information**

The security of personal information is important to us and we take reasonable steps to ensure that the personal information we hold is secure. We take all reasonable steps to protect personal information including external and internal security, restricting access to personal information, maintaining technology products to prevent unauthorised computer access and regularly reviewing our technology to maintain security.

Except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth).

Individuals should notify us immediately if they become aware of any breach of security.

Where personal information is no longer needed for any purpose for which we are authorised to use it and there is no legal requirement for us to keep it, we will take reasonable steps to destroy or de-identify personal information.

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

If you have any questions or concerns relating to our Privacy Policy or you wish to access, update or correct the personal information we hold about you, you can do so by contacting us (see below for contact details). Please provide sufficient detail about the information in question in order to help us locate it. We will then use all commercially reasonable efforts to promptly determine if there is a problem and take the necessary corrective action.

## **Concerns and complaints**

Please contact us as set out below if you have any concerns or complaints about our use of personal information or other privacy issues. Where you express any concerns that we have interfered with your privacy or otherwise breached the Australian Privacy Principles, we will swiftly respond to let you know who will be handling your matter and when you can expect a further response.

If you are not satisfied with the outcome of your complaint or the way we handle it, you may make a complaint to the Office of the Australian Information Commissioner at [www.OAIC.gov.au/privacy/making-a-privacy-compliant](http://www.OAIC.gov.au/privacy/making-a-privacy-compliant).

## **Changes to this Privacy Policy**

As part of our efforts to ensure that we properly manage, protect and process your personal information, changes may be made to this Privacy Policy from time to time. Such changes will be available at AA Group petrol stations and AA Group Head Office and you are encouraged to visit any AA Group petrol station regularly to ensure that you are well-informed of our latest policies in relation to the handling of your personal information.

By continuing to use purchase our goods and services after the Privacy Policy has been amended, you hereby agree to be bound by the terms of such amended Privacy Policy.

## **Governing law**

This Privacy Policy shall be governed in all respects by the laws of Victoria, Australia.

## **Contacting AA Group**

Attention: Privacy Officer  
AA Group  
Post: PO Box 1290, Collingwood VIC 3066  
Phone: (03) 9419 1211  
Email: [enquiries@aaconnect.com.au](mailto:enquiries@aaconnect.com.au)

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