

CAPRICORN PRIVACY POLICY

(released 20 July 2020)

We are bound by the Australian Privacy Principles of the *Privacy Act 1988 (Cth)* and the New Zealand Privacy Principles of the *Privacy Act 1993(NZ)*.

We will protect your personal information under these Privacy Principles and will only use or disclose personal information we hold about you under this Privacy Policy or as otherwise notified to you. We believe that respect for your privacy forms part of the ongoing trust we wish to develop with you.

“Personal information” is information about an individual either identified in the information or whose identity can be ascertained from the information.

This Privacy Policy applies to personal information we collect from you. It also applies to personal information we collect about you from third parties.

We can provide you with a copy of this Privacy Policy upon request.

For this Privacy Policy, we have referred to personal information as ‘information’. Unless otherwise required by the context, reference to ‘information’ does not include information that is not personal information (whether about you, your business or otherwise).

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Who is covered by this Privacy Policy?

This Privacy Policy applies to Capricorn Society Limited (ACN 008 347 313) and its subsidiaries (referred to in this privacy policy as “we”, “us” or “our”). The subsidiaries covered include Capricorn Risk Services Pty Ltd (ACN 111 632 789), Capricorn Insurance Services Pty Ltd (ACN 154 801 377 and AFSL 435197), Capricorn Mutual Management Pty Ltd (ACN 129 143 479), Capricorn Travel Australia Pty Ltd (ACN 008 926 645) and Capricorn Society Financial Services Pty Ltd (ACN 129 134 667).

This Privacy Policy does not apply to Capricorn Mutual Ltd (ACN 104 601 194). The Privacy Policy of Capricorn Mutual Limited is available on its website (www.capricornmutual.com).

This Privacy Policy applies in respect of our business operations and the products and services we provide including:

- Trade credit provided by Capricorn Society Limited;
- Shares issued by Capricorn Society Limited;
- Extended finance provided by Capricorn Society Limited including Capezifinance®;
- Finance broking services provided by Capricorn Society Financial Services Pty Ltd;
- Risk Services arranged through Capricorn Risk Services Pty Ltd, including general insurance brokered by Capricorn Insurance Services Pty Ltd;
- Marketing services provided by Capricorn Society Limited including through the Purple Pages® trade directory and Ignition® magazine;
- Events including gala dinners, trade shows, golf days and BBQs provided by Capricorn Society Ltd;
- ‘Capricorn Convention’ and other travel services provided by Capricorn Travel Australia Pty Ltd;
- ‘Capricorn Fuel Card’ provided by Capricorn Society Ltd with our third-party service providers;
- Capricorn Service Data® and AutoBoost® provided by Capricorn Society Ltd with our third-party service providers;
- Capricorn Rewards Points and the Capricorn Rewards program provided by Capricorn Society Ltd with our third-party service providers; and
- The recruitment and engagement of our officers, employees, contractors and sub- contractors.

Collection of your information

Why do we collect your information?

We collect your information so that we can perform various functions and activities – especially the provision of the products and services that you request from us or that are available to you if you are a Member of Capricorn.

We also collect your information where the law requires us to do so.

If you do not provide us with the information we request, we may not be able to:

- Provide you with the products and services that you request from us or that may be available to you as a customer or as a Member;
- Manage and administer our relationship with you;
- Let you know about other products or services or benefits associated with being a Members or customers; or
- Verify your identity and protect against fraud.

Collecting information from you

We collect most information directly from you when you apply for or use one or more of our products and services. For example, you provide us with information when you complete an application for a trade credit account, register for an event, request that we broker insurance on your behalf, deal with us over the phone or use our websites (including capricorn.coop, capricornrisk.com, capricorninsurance.com.au, capricorn-travel.com.au and theworkshop.capricorn.coop).

We may collect and hold information from you such as your:

- Name, personal and business contact details including addresses, phone numbers, and email addresses and gender;
- Tax file number (in Australia), Inland Revenue Department number (in New Zealand) and GST number;
- Date of birth;
- Financial details relating to you personally and any business you own or are involved in;
- Credit history with us and with third parties including nominated trade referees and details of your trading history with them and our preferred suppliers;
- Reports from credit reporting agencies about your creditworthiness or credit history;
- Transaction and correspondence history with us;
- Number of shares held in Capricorn;
- Bank account and credit card details;
- Driver's licence details;
- Passport details, visa information, health issues, travel preferences and frequent flyer information relevant to your travel requirements;
- Insurance details; and
- Details required by third parties if you have engaged us to arrange a product on your behalf (for example, a fuel card arranged by us, rewards redeemed through the Capricorn Rewards program, finance brokered by us or insurance and risk protection arranged by us) including name, address, date of birth, gender, marital status, occupation, account details, contact details and financial information.

Collecting publicly available information

We may also collect information about you that is publicly available, including from:

- Phone directories and trade directories;
- Websites; and
- Public registers such as the companies register, business names register and the personal property securities register in Australia and New Zealand.

Collecting information from third parties

We may also collect information about you from third parties. For example, we may collect information from:

- Credit reporting bodies if we request a commercial or consumer credit report about your credit history (see the "Credit Reporting" for more information about our credit reporting policy);
- Our preferred suppliers including as you transact with them through your trade credit account;
- Other credit providers or suppliers if you put them forward as a trade reference;
- Our related companies so we can better manage your relationship with us as a whole; and
- Marketing companies, event organisers, mail houses and other services providers if we use them to assist us in providing our products and services.

Collecting sensitive information

Besides collecting your information, occasionally we may collect sensitive information about you.

"Sensitive information" is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation, criminal record, health information, genetic or biometric information.

We will not collect, use or disclose sensitive information about you unless:

- we are legally required to do so; or
- we need that information for our functions or activities, and we have your consent.

For example, we may collect these types of sensitive information about you:

- health information if Capricorn Insurance Services Pty Ltd in the provision of insurance broking services to you is assisting to arrange workers compensation insurance or other personal insurance or assisting you with a claim you have made that involves a personal injury or your health more generally;
- health information if Capricorn Travel Australia Pty Ltd is making travel arrangements on your behalf; or
- information about your membership of professional and trade associations to assist us represent the interest of its members at an industry level when dealing with government or industry bodies.

Collecting information required by law

We may collect information from you because we are required or authorised to do so under law.

For example, before we can provide you with a trade credit account or any extended lending product, we are required under anti-money laundering and counter terrorism financing law to collect certain information from you such as your driver's licence or passport to verify your identity.

Unsolicited information

Sometimes we may receive unsolicited information about you. If so, we will check whether the information is reasonably necessary for our functions or activities and we could have collected it from you had we solicited the information. If it is, we will handle this information as we do with other information we seek from you. If not, and it is lawful and reasonable to do so, we will destroy or de-identify it.

Collecting information prospectively

We may also collect information from you or from third parties prospectively, having identified you as a person that may wish to use our products or services.

Collecting information from prospective employees

When you are dealing with us as a prospective employee, Capricorn generally collects and uses information about you to process and evaluate your application for employment, including identification information and your employment history.

Unsuccessful application forms may be kept on file up to six months to allow those candidates future opportunities.

Collecting information over the phone

When you call us or we call you, we may record the phone call. We will notify you of this at the start of the call and you can tell us if you do not want the call recorded.

We will not take payments over the phone, and instead will provide you with a secure link to make the payment through our third party provided online payment platform.

Collecting information from our websites

When you interact with our websites, certain information about your use of our websites is automatically collected. This may include information such as the date and time of your visit to the website, the pages accessed, cursor movements on the page, documents viewed, previous sites visited, browser type, browser language, general location information, information about the device you used to visit the website and your IP address.

This information may be collected through "cookies" or similar browser or device tracking technologies. We may

link information provided by cookies with other information we hold to identify you personally.

We may use cookies for analytical purposes to improve the content and user experience of our websites. When we do this, cookies identify your browser or device, but not you personally.

We may also use cookies for functional purposes, to manage certain features of our websites including remembering your preferences and selecting and delivering personalised content to you and measuring the delivery and effectiveness of that content.

We may use service providers, including Google Analytics, to help us analyse information about your use of our websites. Information that can personally identify you is not collected by or provided to these service providers as part of the service they provide to us. The information generated about your use of our websites will be transmitted to and stored by our service providers on servers in the United States and around the world. Our service providers will use this information to provide us reports on website use and other services relating to websites.

You can limit or prevent your information from being collected through using private browsers, and by refusing to accept cookies by selecting the appropriate settings on your browser and by installing add-ons to your browser such as the *Google Analytics opt-out browser add-on*.

Collecting information from social networking services

We may use social networking services such as Twitter, Facebook, LinkedIn and YouTube. When you communicate with us using these services, we may collect your personal information. The social networking service may also use your personal information for its own purposes. These services have their own privacy policies which you can access on their websites.

Using your information

How will we use your information?

We may collect, hold, use and disclose information we collect about you for several purposes, including:

- To enable us to consider your application for a product or service;
- To allow us to provide you with our products and services;
- To allow us to manage our relationship with you, including communicating with you about benefits, events or products and services you may be receiving or may receive;
- To allow us to manage our arrangements with our preferred suppliers or other third parties that may be involved in the provision of products or services to you and to allow these same preferred suppliers and third parties to manage their arrangements with you;
- To allow us to help a third party provide to you or manage a product or service when involved in broking or facilitating the provision of that product or service (for example, insurance brokered through Capricorn Insurance Services Pty Ltd or finance brokered through Capricorn Society Financial Services Pty Ltd) or where your access to that third party product or service is based on your relationship with us (for example; protections available from Capricorn Mutual Limited);
- To allow us to provide you with access to products and services available from us in association with third party providers, including Capricorn Service Data® and AutoBoost®;
- To help manage arrangements with third parties where we have outsourced functions to them that relate to the provision of our products or services to you;
- To assist in our general management and administration including; rendering of accounts, risk management, strategic development, systems development, credit management, debt collection, staff training, compliance and research;
- To deal with any enquiries, complaints or concerns with or against us and to manage any legal action that may arise between you and us;
- To prevent or investigate any actual or suspected fraud, illegal act or misconduct;
- To enforce our legal rights;
- To facilitate a sale (or proposed sale) of our business, any of our assets or any other similar corporate

- transaction;
- To comply with any laws, regulations, codes of practice or payment system requirements; and
- Any other purpose that permitted by law or that you consent to.

What do we do with government-related identifiers?

In certain circumstances we may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.

For example, we collect tax file numbers to complete Australian investment income returns and, if applicable, calculate withholding tax on dividends paid. If you do not provide this information, we may not provide income information to the Australian Tax Office and may have to deduct withholding tax from any dividends paid at the highest rate.

Disclosing your information

Who do we disclose your information to?

Consistent with the uses of your information described above, we may disclose information about you to:

- Our related companies, and our employees, officers, assignees, contractors, service providers, mail-houses and external advisers;
- Our preferred suppliers, relating to:
 - the status of your trade credit account (including if it is placed on stop credit) or any other product or service you may receive from us;
 - transactions conducted using your trade credit account;
 - your business contact and transactions details so they may direct market to you; and
 - any disputes you may have with the preferred supplier or us relating to the preferred supplier;
- Other businesses who assist us in providing products and services to you or otherwise provide services to us in relation to our business;
- Third party providers of industry publications, such as the Australian Automotive Aftermarket Association;
- Organisations that verify identities or provide information on politically exposed persons;
- Credit reporting bodies;
- Your agents, advisers, referees, executor, administrator, trustee, the beneficiary of any trust of which you are a trustee, your guardian or attorney;
- Your current and prospective co-borrowers, guarantors, co-guarantors, covenantors and co-covenantors;
- Law enforcement bodies, regulatory bodies and government bodies;
- Our professional advisors, including lawyers and accountants;
- Purchasers (or potential purchasers) of our business or any of our assets;
- Payment system operators;
- Your current and prospective insurers and risk services providers and their authorised agents or reinsurers, where you have requested services from Capricorn Insurance Services Pty Limited or are also a member of Capricorn Mutual Limited;
- Your current and prospective financiers, where you have requested broking services from Capricorn Society Financial Services Pty Ltd;
- Capricorn Risk Services Pty Ltd to provide you access to protections available through Capricorn Mutual Ltd and general insurance products brokered through Capricorn Insurance Services Pty Ltd;
- Capricorn Mutual Ltd and its authorised representatives Capricorn Mutual Management Pty Ltd and Capricorn Risk Services Pty Ltd to obtain and deal with your Capricorn Mutual Ltd membership and protections;
- Airlines, accommodation providers and other travel service providers, where you have requested travel agency services from Capricorn Travel Australia Pty Ltd; and
- Any other party you consent to.

Marketing and your privacy

Our focus is on people and organisations working together for the mutual benefit of all involved. As part of our services to you, we may use or share your information so that products, services or benefits that we think you may be interested in can be identified and direct marketed to you.

We, or our preferred suppliers or other third parties we have a relationship with, may contact you from time-to-time about new or existing products or services we or they offer.

We consider that direct marketing to you by us, our preferred suppliers and other third parties with which we have a relationship forms an integral part of delivering services to you and is directly related to the primary purpose for which we originally collected your information. Without such a service, the communication between you, us and our preferred suppliers and other third parties which we have a relationship with would be substantially reduced and you would be unlikely to receive the benefits and returns you expect from being one of our Members.

We may provide your information to preferred suppliers or other third parties for the purposes of that preferred supplier or third party directly marketing their products or services directly to you.

You can let us know at any time if you no longer wish to receive marketing materials from us (see “Contact Us”). Also, you can let any preferred supplier, or third party know at any time if you no longer want to receive marketing materials from them.

Our direct marketing publications all include details on how you can opt-out of receiving such communication.

Overseas disclosures

We may share your information across the countries we operate in for the purposes set out or permitted in this Policy or as otherwise authorised. We operate in Australia and New Zealand.

Our websites and some of our products or services, or parts of them, may be hosted by or supported by service providers that operate from across the world. We and our service providers may also use cloud-based software solutions to perform internal processes and provide you with the products and services you request. This means that any information which you provide to us, including by email or through our websites or using the products and services we provide, may be transferred, used or stored outside of Australia or New Zealand. We try to ensure that where your information is transferred outside of Australia or New Zealand by us or our service providers, appropriate measures and controls are in place to protect that information.

Your information may be shared, stored, held or used by an overseas person or organisation to provide you with the products or services you have requested or may receive from us, including in these situations:

- Capricorn Risk Services Pty Ltd and Capricorn Insurance Services Pty Ltd may provide information to overseas based insurers, agents and reinsurers connected with protections and insurance policies you may have or may be applying for;
- Capricorn Travel Australia Pty Ltd may provide your information to overseas based travel service providers such as airlines, hotels and tour operators in connection with travel services being arranged on your behalf. Dependent on the travel services requested, those travel service providers could be located anywhere in the world including in countries where the privacy laws differ substantially from Australia. Capricorn Travel Australia Pty Ltd cannot control the activities of these travel service providers. If you engage with Capricorn Travel Australia Pty Ltd you consent to your information being provided to travel service providers without Capricorn Travel Australia Pty Ltd needing to try to ensure that the Privacy Act will be complied with and if the recipient may not be accountable under the Privacy Act and you may not be able to seek redress under the Privacy Act;
- When providing you with products and services available from us through, or supported by, third party providers, including Fuel Cards, the Capricorn Rewards program, Capricorn Service Data® and AutoBoost®, where those third-party providers operate in whole or in part from overseas or themselves

- use overseas third-party providers to provide the relevant products or services;
- When you consent to the disclosure; or
- When obtaining your consent is not practicable and we consider that the disclosure is for your benefit and that you would have consented to the disclosure.

Credit reporting

Collecting credit information

We participate in the credit reporting system.

We may obtain a credit report about you from a credit reporting body if you:

- Apply for credit with us (for example; trade credit or Capezifinance® extended finance);
- Put yourself forward as a covenantor or guarantor for another person applying for or receiving credit from us; or
- Receive credit from us or are a covenantor or guarantor for another person that receives credit from us.

To request a credit report, we will disclose to a credit reporting body information that identifies you (such as your name, address, date of birth and driver's licence number) and relates to the credit you are applying for or seeking to covenant or guarantee.

Credit reports contain information about your credit worthiness and credit history with other credit providers. This information may include information about your previous and current credit applications, credit facilities, credit repayment history and any payment defaults.

We will often combine information in credit reports with information we already hold about you or that has been obtained from other sources (for example, trade references from existing suppliers or any past relationship you have had with us).

Using credit information

We will use this information to:

- Assess any application you make for credit;
- Assess your suitability as a guarantor;
- Assist in our general management and administration including; risk management, strategic development, systems development, credit management, debt collection, staff training and research; and
- Comply with any laws, regulations, codes of practice and payment system requirements.

Disclosing credit information to credit reporting bodies

As a participant in the credit reporting system we may disclose information about your credit history with us to credit reporting bodies including:

- That you receive credit from us;
- The type and amount of credit you receive;
- The terms of your credit;
- Your payment history;
- Any default or failure to make payment; and
- Any behaviour considered by us to be adverse, such as fraud or evasion of repayment obligations.

When we inform a credit reporting body, it may then be included in credit reports that the credit reporting body then gives to other credit providers. Some of that information may reflect adversely on your credit worthiness, for example, if you fail to make payments. That information may affect your ability to get credit from other credit

providers.

We may disclose information to the following credit reporting bodies:

	Australia	New Zealand
illion	Phone 13 23 33 www.illion.com.au	Phone 0800 733 707 www.illion.co.nz
Equifax	Phone 13 83 32 www.equifax.com.au	Phone 0800 692 733 www.equifax.co.nz

Credit reporting bodies must have a policy explaining how they manage your information. You can contact these credit reporting bodies for more information about their policy or information about you that they may hold.

We will not disclose credit information or credit eligibility information to entities without an Australian link.

Contact credit reporting bodies if you think you have been the victim of a fraud

You may request that a credit reporting body not use or disclose credit reporting information they hold about you if you reasonably believe that you have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a "ban period". You can make such a request to the credit reporting bodies listed above.

Pre-screening assessments by credit reporting bodies

We will use no information that we receive from credit reporting bodies for marketing. However, for some products or services we may ask a credit reporting body to use credit information they hold to identify individuals that may be eligible for a product or service and to send those individuals information about that product or service on our behalf. This is known as "pre-screening assessments". If you are such an eligible person you may receive this information. You may contact credit reporting bodies to say you do not want your information used in pre-screening assessments. If you do this, the credit reporting body must not use your information for the purpose of pre-screening assessments.

Taking care of your information

How do we take care of your information?

We store information in different ways, including in paper and electronic form. The security of your information is important to us and we try to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some ways we do this are:

- Physical security of business premises;
- Confidentiality requirements of our employees;
- Record management policies;
- Security measures for access to our systems;
- Only giving access to information to a person who reasonably requires access to it -to perform their duties;
- Control of access to our buildings; and
- Electronic security systems, such as firewalls and data encryption on our websites.

We may store information physically or electronically with third party data storage providers (including those that may be located or host information overseas).

What happens when we no longer need your information?

We will only keep your information for as long as we require it for the purposes it was collected for. We are also required to keep some of your information for certain periods of time under law. When we no longer require your information, we will ensure that your information is destroyed or de-identified.

We will retain information and use it to ensure that we identify persons who have, in the past, failed to meet their repayment obligations to Capricorn, either directly or through their association with a business.

Accessing your information

How do you access your information?

Generally, you may know all the information we hold about you. We will give you access to your information in reasonable time upon your request to us, using the Contact details provided in the Privacy Policy.

We will give you access to your information in the form you want it where it is reasonable and practical to do so. We may charge you for our reasonable expenses relating to giving you access, but we will always notify you of any expenses before complying with your request for access.

In certain circumstances we cannot give you access to your information. For example, this may include when:

- Giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- The access would have an unreasonable impact upon the privacy of other individuals;
- The request for access is frivolous or vexatious; or
- The access would be unlawful or would prejudice any legal investigations.

If we cannot provide your information in the way you have requested, we will tell you why in writing and attempt to find an alternative way to satisfy your request.

How do you access your credit information?

Where you request access to credit information about you that we have got from credit reporting bodies (or based on that information), you have the following additional rights.

We must:

- Provide you access to the information within 30 days (unless unusual circumstances apply);
- Make the information clear and accessible; and
- Ask you to check with credit reporting bodies what information they hold about you.

We do not have to give you access to this information if it would be unlawful or harm the activities of an enforcement body (e.g. the police).

We may also restrict what we give you if it would harm the confidentiality of our commercial information.

If we refuse to give access to any credit eligibility information, we will tell you why in writing.

Dealing with us anonymously

If you have general enquiries, you can make this anonymously or by using a pseudonym. We may also offer anonymity regarding surveys and questionnaires. However generally, we will not be able to deal with you anonymously or where you are using a pseudonym if:

- It is impracticable for us to do so; or
- We are required or authorised by law or a court/tribunal order to deal with you personally.

It is impractical for us to offer anonymity or pseudonymity to individuals in relation to our main business activities, including the provision of trade credit accounts. To comply with anti-money laundering and counter terrorism financing law we cannot provide credit to anyone unless we have identified them.

Correcting your information

How do you correct your information?

We try to make sure that the information we collect, use or disclose is accurate, complete and up to date. We also try to ensure that information we hold is relevant having regard to the purpose for which it was collected.

Contact us if you think there is something wrong with the information we hold about you and we will try to correct it if it is inaccurate, out of date, incomplete, irrelevant or misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We will try and help where we can and, if we cannot, we will let you know in writing.

What additional things do we have to do to correct your credit information?

Whether we made the mistake or someone else made it, we must help you ask for the information to be corrected. To do this, we might need to talk to others. However, the most efficient way for you to make a correction request is to send it to the organisation which made the mistake.

If we can correct the information, we will let you know within a reasonable period of doing so. We will also let the third parties know and any others you tell us about. If there are any instances where we cannot do this, then we will let you know in writing.

If we are unable to correct your information, we will explain why in writing within a reasonable period of making this decision.

Resolving your privacy issues

How can you make a complaint?

If you believe your privacy has been breached, or you do not agree with a decision we have made about your access to or correction of information, you can make a complaint to us through our Privacy Officer and we will endeavour to resolve it by following our internal complaint resolution process.

We will try to address any complaints we receive and provide you with a written response within 21 days.

If you have any concerns, you may complain to the Office of the Australian Information Commissioner or New Zealand Privacy Commissioner.

Need more help?

For further information about privacy issues in Australia and protecting your privacy, you may visit the Office of the Australian Information Commissioner website at www.oaic.gov.au/privacy.

For further information about privacy issues in New Zealand and protecting your privacy, you may visit the Privacy Commissioner's website at www.privacy.org.nz.

If you still feel your privacy issue has not been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner or New Zealand Privacy Commissioner.

The Office of the Australian Information Commissioner

Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au
Mail: GPO Box 5218
Sydney NSW 2001

The Office of the New Zealand Privacy Commissioner

Phone: 0800 803 909
Email: enquires@privacy.org.nz
Website: www.privacy.org.nz
Mail: PO Box 10-094
The Terrace Wellington 6143

Changes to this Privacy Policy

We will occasionally review this Privacy Policy . We will let you know of any changes by posting a notification on our websites and updating the date of this Privacy Policy. We encourage you to review our Privacy Policy from time-to-time for any changes. Any changes to our Privacy Policy will be effective on the date they are published on our website.

Contact us

We care about your privacy and always welcome your feedback. Please contact us if you have any questions about the way we handle your information.

Phone: 1800 327 437 (Australia)
0800 401 444 (New Zealand)
Email: privacy@capricorn.coop
Mail: The Privacy Officer
Capricorn Society Limited
Locked Bag 3003
West Perth WA 6872 Australia