

Maven Program Privacy Policy

General Motors Holden Australia NSC Pty Ltd trading as MAVEN DRIVE (**MAVEN**), a related body corporate of GM Holden Ltd (**Holden**), recognises the importance of protecting an individual's privacy. We appreciate that individuals are concerned about the security of their personal information and we are committed to protecting any personal information we hold.

This Privacy Policy describes how we, MAVEN, collect, use, store, and disclose information we obtain about you directly or indirectly when you use the MAVEN website and any services available through the MAVEN website, in any other interactions and communications you may have with MAVEN or Holden in relation to the MAVEN commercial vehicle rental program (collectively, the **MAVEN Program**), and when you reserve and use any vehicle available under the MAVEN Program (**MAVEN Vehicle**).

Personal information is information or an opinion about an individual who is identified or reasonably identifiable.

In accordance with the Australian Privacy Principles (**APPs**) set out in the *Privacy Act 1988* (Cth) (**Privacy Act**), this Privacy Policy details how MAVEN will manage and protect personal information, including information that MAVEN collects and uses for the purpose of providing better customer service by striving to meet our customers' needs and expectations about our services.

MAVEN may amend this Privacy Policy at any time for any reason. MAVEN will obtain your consent if we make any material change to this Privacy Policy, but you should check the Privacy Policy regularly for changes and each time you visit the MAVEN website or provide us with personal information.

Consent

We encourage you to read this Privacy Policy carefully. By accessing or using the MAVEN website, engaging with us in relation to the MAVEN Program, by using a MAVEN Vehicle, or otherwise disclosing your personal information to us, you are agreeing to this Privacy Policy and:

- consenting to the collection, use, disclosure and processing of your personal information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a computer/mobile/hand held device or using or touching your information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information;
- acknowledging that each MAVEN Vehicle may be fitted with a GPS tracking or location device which is active, and consenting to the collection, use, storage, and/or disclosure of the GPS Information by MAVEN as set out in this Privacy Policy; and
- consenting to the disclosure of your personal information to Uber as set out in this Privacy Policy.

If you are providing us with personal information about any other person, please inform that person that we have collected their information and advise them of the contents of this Privacy Policy.

We may require your consent to use and/or disclose your personal information if we need to use your information for a purpose that is not related to the purpose for which it was collected or that is not disclosed in this Privacy Policy.

If you do not consent to MAVEN collecting, using and/or disclosing your personal information, this may affect MAVEN's ability to deliver and improve its products and services to you.

Collecting Personal Information

MAVEN will be fair and open about the way we collect information about you and what we intend to do with the information. When you access, use, or engage with us in relation to the MAVEN Program, or access or use the MAVEN website, we may collect certain information about you or the MAVEN vehicle you reserve and use under the MAVEN Program).

The kinds of personal information we may collect about you in relation to the MAVEN Program includes:

- Identification and Contact Information, such as name, address, city, state and post code, date of birth, email address and telephone number;
- Driver's License Information, such as driver's license number, the driver's license expiration date, date of birth, and the state and date of issuance;
- Uber Driver Registration Information, such as Uber driver registration number or other information that identifies you as an Uber driver;
- Credit check information, such as your credit score;
- Payment Information, such as credit card number, credit card type, expiration date and CVV number;
- Internet Protocol (**IP**) addresses, Unique Device Identifiers (**UDIDs**) and other unique identifiers in specific circumstances;
- Aggregate Data, based on your interaction with the MAVEN website (see the Cookies/Tracking Technologies section below for additional information); and
- Any other information you give to MAVEN, including any photographs and/or images of yourself or otherwise.

Other than the personal information set out in this Privacy Policy, MAVEN does not collect any credit information about you. If we receive information about you from a third party, wherever reasonably practical we will make sure they undertake to comply with the Privacy Act.

MAVEN Vehicles are Holden vehicles. Holden vehicles, like other modern motor vehicles, have a number of sophisticated computer systems that monitor and control several aspects of the vehicle's performance. Holden vehicles use on-board vehicle computers to monitor emission control components to optimize fuel economy, to monitor conditions for air bag deployment and, if so equipped, to provide anti-lock braking and to help the driver control the vehicle in difficult driving situations. Some information may be stored during regular operations to facilitate repair of detected malfunctions; other information is stored only in certain collision events by computer systems, such as those commonly called event data recorders (**EDR**). The information from EDR's, if available, is collected and used to improve customer and driver safety, better understand what happens to our vehicles in the event of a collision and shall be provided to the police on request.

Collection of GPS Information

MAVEN Vehicles may be fitted with GPS location devices which are active. When you reserve, collect and use a MAVEN Vehicle as part of the MAVEN Program, MAVEN may remotely collect information regarding the use, operation, performance and location of the vehicle (including driving speed, kilometres driven, MAVEN Vehicle location and other similar information) (the **GPS Information**). MAVEN may also collect this information directly from the MAVEN Vehicle, for example during the rental renewal process, MAVEN Vehicle return or at a MAVEN Vehicle service appointment.

Use of Personal Information

MAVEN only collects, holds and uses information about you that is necessary for us to provide the MAVEN Program you request from us, that is otherwise reasonably necessary for our business activities or if required by an Australian law or court or tribunal order.

We may use the personal information we collect about you for a number of purposes including:

- for identity and pre-authorisation checks and assessments in connection with your registration and participation in the MAVEN Program;
- to provide the MAVEN Program, including to facilitate reservation of MAVEN Vehicles, payments, and receipts for services;
- to communicate with you about your account, the MAVEN Vehicle, or the MAVEN Program;
- to investigate any complaints;
- to personalise or customise your experience with the MAVEN Program and/or MAVEN Vehicles;
- to improve, troubleshoot, and evaluate the use of our products, vehicles and services;
- to provide MAVEN Vehicle support and service;
- to evaluate vehicle performance and safety;
- to tell you about other products and services which may be of interest you;
- to undertake direct marketing and/or run a competition or promotion you have entered;
- to improve driver safety and to better understand what happens to Holden vehicles in the event of a collision;
- to conduct data analysis, testing and research;
- for other purposes to which you have consented; and
- as required by the relevant laws and regulations.

Generally, we may use your personal information for the purposes for which we collected it and for related purposes which would be reasonably expected by you.

If you do not provide your personal information, we may not be able to perform the above functions or fully provide you with all of the MAVEN Program.

Disclosing Personal Information

We will only disclose your Payment Information and Driver's License Information with our service providers to provide or support the MAVEN Program.

We may disclose the personal information we collect about you for different purposes including:

- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or respond to a law enforcement request;
- with our service providers who do not have an independent right to use the information to which they have access or that we disclose to them;
- with our business partners, for MAVEN marketing activities, business partner marketing activities, or both;
- with Uber, for the purpose of verifying that you are validly participating in the Uber program, debt recovery (if relevant), and other purposes that you would reasonably expect in relation to the MAVEN Program;
- with third parties for storage, processing, research and development purposes (such as university research institutes for improving highway safety);
- in connection with the sale, transfer or financing of a significant part of a MAVEN business or its assets, including any such activities associated with a bankruptcy proceeding;
- within MAVEN, MAVEN's related entities and affiliates, Holden's dealers or Holden's licensees;
- to our website host or software application providers, in certain limited circumstances, for example when our website experiences a technical problem or to ensure that it operates in an effective and secure manner;
- those you ask us to share this information with;
- to assist our related companies (such as Holden and Holden New Zealand) and other service providers (such as information technology service providers);
- as required by relevant laws and regulations or court orders; and
- if we otherwise notify you and you consent to the disclosure.

MAVEN may need to disclose personal information outside of the jurisdiction from which it was collected. When we disclose your personal information overseas, MAVEN is generally required to take reasonable measures to ensure that your information is held, managed and accessed in accordance with the standards that apply in Australia.

MAVEN may disclose personal information to such entities located in the following countries/regions:

- the USA;
- Spain and other countries in Europe;
- United Kingdom;
- Oceania; and
- Asia.

We will not sell, rent or trade your personal information to or with any other organisation.

Marketing

MAVEN sends marketing materials (including direct marketing) to its customers and other people who have provided MAVEN with personal information from time to time about products and services offered by MAVEN and its affiliates.

If you do not wish to receive marketing and promotional materials from MAVEN, you may unsubscribe either by completing the opt-out provision on the marketing or promotional materials sent to you, contacting MAVEN Customer Care on 1800 466 283 or at gig.australia@maven.com. MAVEN will note your request and respect your wish not to receive any marketing materials.

If you choose not to receive any marketing materials from MAVEN, you may miss out on special product and service offerings and opportunities.

Cookies/Tracking Technologies

We use cookies and track IP addresses via the MAVEN website so we can improve our services provided by our websites and enhance your user experience.

Cookies are pieces of information a website can send to your computer's browser for record-keeping purposes. We use cookies to ascertain which web pages are visited and how often, to make our websites more user friendly, to give you a better experience when you return to a website and to target advertising to you that we think you may be interested in. For example, cookies allow us to save your password so you do not have to re-enter it every time you visit our website. Most web browsers automatically accept cookies. At this time, we do not honour "do not track" signals from a website browser. However, you may refuse or delete cookies. Please refer to your browser Help instructions to learn more about cookies and other technologies and how to manage their use. If you elect to refuse or delete cookies, you will need to repeat this process if you use another computer, or change browsers. If you choose to decline cookies, some of the functionality of a website may be impaired.

Similarly, we may also place Web beacons in our emails to measure the effectiveness of our email campaigns by identifying the individuals who open or act upon an email message, when an email message is opened, how many times an email message is forwarded, the type of software, device, operating system and browser used to deliver the email and any URL accessed through our email message. This information may also be used to evaluate our online advertising campaigns or to tailor promotions and other marketing messages to you.

To measure website activity and provide a better user experience, we may allow our service providers or business partners to compile information from the cookies, Web beacons or other technologies on our websites which may include information about your visit (such as demographic data, browser type, IP address, pages visited, activities conducted on the page and the day and time of your visit). We may also allow third party advertising and personalization partners to use this information to develop personalized content and appropriate advertising based on your visits over time on the MAVEN website and other non-MAVEN affiliated websites.

Opting out of relevant advertising will not opt you out of all advertising, but rather only those advertisements that are personalised to your interests.

Social Media Sharing

The MAVEN Program may also include functionality that will allow you to share on social media platforms such as Facebook and Twitter. Depending on your privacy settings on these social media platforms, you understand and agree that when you post content or information, you may be allowing: a) access to that content and information; b) use of that content or information; and c) the ability for others to associate that content or information with you. In addition, these social media platforms may collect information about you in connection with the content you post. All content you post on these third party social media platforms is subject to the third party's specific terms and conditions and privacy statement. MAVEN is not responsible for that information collection. We recommend that you check the terms and conditions and privacy statement of these social media platforms prior to using this functionality.

Data Retention

We will retain the information collected for the duration of your use of and participation in the MAVEN Program, and a reasonable time thereafter. If you'd like us to delete the information you have provided, please call 1800 466 283. Please note, we may be required to retain certain information by law.

Protecting Personal Information

MAVEN will keep your information secure by taking reasonable steps to protect it from misuse, loss and unauthorised access, modification and disclosure.

MAVEN stores personal information in transmission logs and archive systems for a period MAVEN considers reasonable depending on the primary purpose for which that information was collected. Only properly authorised people who have a need to access personal information to perform their job will be able to see or use that personal information. The physical and electronic security systems at MAVEN and Holden comply with the guidelines of the Office of the Australian Information Commissioner.

Personal information will be de-identified or destroyed when it is no longer required such that it cannot be re-identified at a later date. The de-identification and destruction process will be in accordance with the guidelines of the Office of the Australian Information Commissioner.

MAVEN will ensure that its employees receive training (and refresher training) about the management of personal information relevant to their respective roles and responsibilities.

We use technical, administrative, and physical safeguards designed to protect your personal information and we require third party service providers to maintain similar safeguards against loss, misuse, and unauthorized access, disclosure, alteration, destruction, or theft of your personal information. To the extent the MAVEN Program may utilise third party wired and/or wireless networks, we can't promise that your communications won't be intercepted by others. You agree that MAVEN won't be liable for any damages for any loss of privacy occurring in communication over such networks.

MAVEN will take reasonable steps to keep any personal information we hold about you secure. However, 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 your personal information. Nothing in this Privacy Policy restricts, excludes or

modifies or purports to restrict, exclude or modify any statutory rights under any applicable law including the Privacy Act or the *Competition and Consumer Act 2010* (Cth). Please notify us immediately if you become aware of any privacy or security breach.

Accessing and Requesting Correction of Personal Information

We will strive to ensure that information about you is accurate when we collect or use it. Subject to some exceptions under the applicable privacy legislation, we will let you see the information we hold about you and correct it if it is inaccurate, incomplete or out-of-date. If we do not grant you access to your personal information we will tell you why.

If you wish to obtain access to and/or correct your personal information held by MAVEN, please contact MAVEN Customer Care on 1800 466 283 or email us at gig.australia@maven.com.

MAVEN will provide written acknowledgement of receiving your request for access within 7 days of receipt. Unless we do not agree to your request for access to personal information, in most cases we will provide you with access within 30 days of receipt of your request. If you request corrections to your personal information and we agree with your request, these changes will be made as soon as practicable. If we do not agree to your request for correction, we will notify you of the reasons we do not agree and will note your request on the records we hold about you. If you remain dissatisfied you may also complain to the Office of the Australian Information Commissioner (at www.oaic.gov.au).

Resolving your Concerns and Complaints

If you have a complaint regarding MAVEN's management of your personal information, please prepare your complaint in writing and email it to us at gig.australia@maven.com.

MAVEN will provide written acknowledgement of your complaint within 7 days of receipt. We will investigate and advise you of the steps we have taken to resolve your complaint within 30 days of receipt of your complaint.

Further questions

If you have any questions about this Privacy Policy or our privacy practices you can contact us on 1800 466 283 or gig.australia@maven.com.

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