Privacy Policy

1. About this privacy policy

1.1 Harmony New Energy Auto Service (AUSTRALIA) Pty Ltd and its Australian related companies set out below (together "**Harmony AU**", "**we**", **"us"** or **"our"**) take privacy seriously. This privacy policy sets out the types of personal information we collect, how we collect, hold, use and disclose that information, who we share it with in relation to our business and your rights and options in relation to your information.

1.2 This policy covers the following Australian entities, which are part of the iCar Group Limited group of companies ("**iCar Group**").

#	Company Name	ACN	Registered address
1	**HARMONY NEW ENERGY AUTO SERVICE (AUSTRALIA) PTY LTD**	674 201 097	107-113 Parramatta Road, Haberfield NSW 2045
2	**HARMONY NEW ENERGY AUTO SERVICE (WSP) PTY LTD**	675 630 841	'21 & 36 TOWER 4 WEST SIDE PLACE' SHOP, RETAIL, 250 SPENCER STREET, MELBOURNE VIC 3000
3	**HARMONY NEW ENERGY AUTO SERVICE (CAROLINE SPRINGS) PTY LTD**	687 432 104	'21 & 36 TOWER 4 WEST SIDE PLACE' SHOP, RETAIL, 250 SPENCER STREET, MELBOURNE VIC 3000
4	**HARMONY NEW ENERGY AUTO SERVICE (QLD) PTY LTD**	696 975 461	107-113 Parramatta Road, Haberfield NSW 2045
5	**HARMONY NEW ENERGY AUTO SERVICE (PARRAMATTA) PTY LTD**	674 199 412	107-113 Parramatta Road, Haberfield NSW 2045
6	**HARMONY NEW ENERGY AUTO PRO SERVICING PTY LTD**	675 633 413	107-113 Parramatta Road, Haberfield NSW 2045
7	**HARMONY NEW ENERGY AUTO SERVICE (NOWRA) PTY LTD**	687 484 108	107-113 Parramatta Road, Haberfield NSW 2045
8	**HARMONY NEW ENERGY AUTO SERVICE (DENZA ADELAIDE) PTY LTD**	694 979 827	37-41 Main North Road, MEDINDIE SA 5081
9	**HARMONY NEW ENERGY AUTO SERVICE (CAMPBELLTOWN) PTY LTD**	687 481 947	26 Blaxland Road, Campbelltown NSW 2560
10	**HARMONY NEW ENERGY AUTO SERVICE (DENZA KEW) PTY LTD**	693 838 265	116-128 Denmark Street, Kew VIC 3101
11	**HARMONY NEW ENERGY AUTO SERVICE (DENZA MELBOURNE) PTY LTD**	693 838 274	194-210 Kings Way, South Melbourne VIC 3205

#	Company Name	ACN	Registered address
12	**HARMONY NEW ENERGY AUTO SERVICE (WOLLONGONG) PTY LTD**	687 432 524	107-113 Parramatta Road, Haberfield NSW 2045
13	**HARMONY NEW ENERGY AUTO SERVICE (CASTLE HILL) PTY LTD**	688 018 242	107-113 Parramatta Road, Haberfield NSW 2045

1.3 This policy applies specifically to Harmony AU websites, apps, social media, and dealerships (including but not limited to sales and after-sales activities). For privacy information regarding BYD's websites (including Denza branded websites), in-vehicle system or mobile app, please refer to the respective privacy policy on the BYD or Denza website, within the vehicle's display or the BYD app.

2. Meaning of personal information

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

3. Kinds of personal information we collect and hold

3.1 We collect personal information from customers, potential customers, supplier personnel, advisors, consultants and other professional experts, employees and job applicants.

3.2 The kinds of personal information we collect and hold are:

(a) **Personal details**: Customer's name, title, date of birth, residential and postal address, personal email address and telephone number;

(b) **Business details:** For business customers, company legal name, trading name, ABN, ACN, registered or business address, business email address and business telephone number, authorised contact person's name, job title, business email address and business telephone number;

(c) **Transaction details**: Including vehicle purchase details, transaction amounts, payment records and delivery information;

(d) **Vehicle details**: Including VIN, registration number, model, year of manufacture, odometer readings, vehicle purchase and delivery details, service and repair history, diagnostic information, vehicle condition reports and valuation details, for after sales and business purposes.

(e) **Identification and account information**: Driver licence number, issuing state and expiry date, customer or user account ID, login credentials, identity-verification results, and social media account or advertising platform identifiers.

(f) **Online / system identifiers**: We use cookies, tracking pixels and other online technologies. We receive aggregated metrics, such as the total number of visitors to our website.

(g) **Customer and marketing preferences:** Preferred dealership, preferred contact methods, marketing communications preferences and preferred vehicle models or features.

(h) **Financial Details**: Income, occupation and employment details, employer name, residential or property ownership status, assets, liabilities and expenses, bank account or payment card details, payment and transaction history, finance application information and credit-assessment results.

(i) **Photographic images or locations**: Copies or images of identification documents, customer and vehicle photographs, CCTV footage, electronic signatures.

(j) **Comments or opinions**: Vehicle purchase experience questionnaires, satisfaction ratings, survey responses, free-text feedback, complaints, customer service transcripts, chat messages, social media comments, product reviews, and dealer or customer service notes.

(k) **Job applicant and employee information:** Information provided in job applications and as part of the employment or contractor relationship, including personal details, work history and education details, visa and work entitlement information and record of interviews. In some circumstances we may also request health information or a criminal history check.

(l) **Sensitive information:** We may occasionally collect sensitive information if you voluntary provided it to us or it is required for insurance, recruitment or safety and security purposes. We will obtain consent when such information is collected if required under applicable law.

4. Why we collect, hold, use and disclose your personal information

4.1 We collect, hold and use your personal information so that we can provide our goods and/or services, administer our business and comply with the law. The specific purposes for which we handle your personal information are to:

(a) **Personal and business details**: To identify and communicate with customers, manage enquiries, test drives, vehicle orders, purchases, delivery, servicing; maintain customer records, direct marketing or serving online advertising (in accordance with applicable laws) and comply with legal obligations.

(b) **Transaction and vehicle details**: To facilitate the sale, trade-in, purchase or delivery of vehicles, provide after sales and warranty services and for related business purposes.

(c) **Identification and account information:** To verify identity and eligibility, create and manage customer accounts, authenticate access to services, administer test drives, vehicle purchases and finance applications, prevent fraud and maintain security.

(d) **Online / system identifiers**: To operate and secure websites, mobile applications, customer portals and authenticate users and devices, diagnose technical issues, prevent misuse or cyber incidents, analyse system performance and, where permitted, measure and personalise marketing.

(e) **Customer and marketing preferences**: To understand customer requirements and vehicle usage needs, conduct market research, and provide more relevant products, services and communications and direct marketing or serving online advertising (in accordance with applicable laws).

(f) **Financial Details:** To process deposits, purchases, payments, refunds and assist with finance applications, manage billing and accounts, prevent fraud, maintain financial records, and comply with taxation, accounting, anti-money laundering and other legal obligations.

(g) **Photographic images or locations**: To verify identity, document vehicle condition, manage vehicle delivery, servicing, warranty and insurance-related matters, maintain safety and security through CCTV.

(h) **Comments or opinions**: To respond to enquiries, feedback and complaints, measure customer satisfaction, improve vehicles, dealerships and customer services; monitor service quality, conduct research and analysis, maintain records of customer interactions and manage legal claims or disputes.

(i) **Job applicant and employee information:** To assess eligibility for relevant roles and manage the employee relationship.

4.2 We also disclose your personal information to third parties for different purposes as follows:

(a) BYD Australia Pty Ltd for the purpose of arranging the sale and delivery of vehicles, after-sales service, warranty claims and related customer support;

(b) other companies in the iCar Group to provide us with business services;

(c) finance and novated leasing companies for the purpose of arranging finance or leases;

(d) service providers for the purpose of providing us with services such as hosting services and website operation, finance and dealership management platform, vehicle maintenance services, insurance providers in the event we need to make a claim, HR services, marketing services, and used-vehicle services; and

(e) law enforcement and government authorities to comply with applicable law or when otherwise appropriate.

5. How we collect your personal information

5.1 We generally collect your personal information directly from you whenever you interact with us, for example, when you enquire about our vehicles or arrange a test drive, purchase or use any of our products or services, call us or contact us by email, SMS, through social media or any other channels, interact or otherwise visit our website or use our app.

5.2 We also collect your personal information as follows:

(a) from other entities in the iCar Group;

(b) from BYD Australia Pty Ltd, to arrange test drives, enquiries, sales and after-sales services that you request through the BYD or Denza Australia websites, the BYD Auto APP or BYD's sales and after-sales service IT system, and through BYD connected-car diagnostic tools;

(c) from financial service providers and insurers for the purposes of confirming if finance and insurance have been approved;

(d) from social media platforms where you have you have interacted with our social media pages or advertisements;

(e) from third party providers of recruitment services and work eligibility checks and current or former employers for reference check purposes if you are applying for a job;

(f) when you attend dealership events, test-drive events and promotional activities; and

(g) from fleet and referral partners, and authorised website or lead providers.

6. How we store and hold personal information

6.1 We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

6.2 We use third party hosting and service providers located in Australia and overseas including in Singapore, Japan, and United States.

6.3 We implement and maintain processes and security measures to protect personal information, which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

6.4 These processes and systems include the following:

(a) controlling physical access to premises via access cards, keys, door locks, video surveillance (eg, CCTV) and alarms; and

(b) using virtual access controls including password protections for accounts and computer systems and two-factor authentication, restricting access to data and files to only those who need to know and logging of access and (attempted) misuse.

7. Disclosure of personal information to overseas recipients

7.1 We are part of the global iCar Group and may disclose your personal information to iCar Group companies, BYD group companies or other service providers that are located outside Australia.

7.2 Those recipients are likely to be located in Hong Kong, Singapore, United States and Japan.

8. Access to and correction of your personal information

8.1 You have a right to request access to, or correction of, the personal information that we hold about you by contacting us. Our contact details are set out below at paragraph 10.

8.2 There are some circumstances where we may refuse your request to access or correct your personal information. If we refuse your request, we will notify you in writing of the reasons for the refusal. If you disagree with our decision, you may make a privacy complaint using the complaints procedure set out below at paragraph 9.

8.3 If we are unable to correct your personal information, you may ask us to include a statement that you believe your personal information is inaccurate, out of date, irrelevant or misleading.

8.4 There is no charge for requesting access to, or correction of, your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

8.5 We will respond to your requests to access or correct personal information within a reasonable period, which is generally within 30 days of receiving your request.

9. Privacy complaints

9.1 If you have a complaint about the way in which we have handled your personal information, including in relation to your request for access or correction of your personal information, you should contact us first using the details set out below at paragraph 10.

9.2 We will consider your complaint within a reasonable time, which is generally within 30 days of receiving your request, and determine whether it requires further investigation. We may ask for further information to confirm your identity and to properly assess your complain. We will notify you of the outcome of this investigation.

9.3 If you remain dissatisfied with the way in which we have handled a privacy issue, you may make a complaint to the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au).

10. Contact details

10.1 If you have any questions, comments, requests or concerns, please contact us at:

Contact: Privacy Officer

E-mail: privacy@harmonyauto.com.au

Address: 888 Doncaster Road, Doncaster East, VIC 3109

11. Changes to this policy

11.1 From time to time, we may update this privacy policy to reflect changes to how we handle personal information or the types of personal information that we hold. Any changes to this policy will be published on our website.

11.2 You may obtain a copy of the current policy from our website or by contacting us at the contact details above set out in paragraph 10.