

# Travvia Group Privacy Policy

Last updated 18 November 2024

## 1. GENERAL

Your privacy is important to us. This Privacy Policy explains what personal information Travvia Group collects from you, how we use it, how we store it, how you can access and correct that information and when we might share information with other people.

If you can't find what you are looking for or have any concerns or feedback, please email us at [privacy@travviagroup.com](mailto:privacy@travviagroup.com). You can also write to us at: Privacy, Travvia Group, PO Box 68199, Victoria Street West, Auckland, NZ, 1010.

In this Privacy Policy:

- (a) **"we", "our", "us" and "Travvia Group"** means JUCY Group (2020) Limited (NZCO 8480107) and its related entities, including: JUCY Rentals NZ (2020) Limited (NZCO 8125542), JUCY Pty Limited (ACN 124 851 047) t/as Travvia, Star RV Australia Fleet Pty Limited t/a Travvia Group (ACN 661 766 696), and Star RV New Zealand Fleet Limited (NZCO 8455463).
- (b) we use the terms:
  - (i) **"customer"** to refer to individuals who engage us to provide goods and services, such as making a booking, requesting a quote, picking up a vehicle, checking in via our online portal, and using any of goods and services (including as a passenger);
  - (ii) **"entrants"** to refer to individuals who enter into any of our competitions or trade promotions;
  - (iii) **"suppliers"** to refer to individuals who provide us with goods or services, and individuals at businesses who provide us with goods or services;
  - (iv) **"visitors"** to refer to individuals who engage with us on our website, or who enquire about our functions or activities via electronic means;
  - (v) **"applicants"** to refer to individuals who apply for employment or other engagement with us; and
  - (vi) **"you"** means someone who belongs to at least one of the groups listed above. In some circumstances, you may belong to more than one of these groups, and multiple sections of this Privacy Policy will then apply to you.

Travvia Group is responsible for the collection, use and disclosure of personal information in the context of providing the information, products and services we outline in this Privacy Policy, and is a data controller for the purposes of this Privacy Policy.

When you interact with us or visit and use our online applications, your personal information will be handled in accordance with this Privacy Policy. You are also responsible for ensuring that any other persons travelling with you are aware of the content of this Privacy Policy and agree with you supplying their personal information to us to make a booking or other purchase on their behalf.

If you make bookings or request information, products and services for other people, such as your family, friends, or employees, you must make sure you are authorised to give us their personal information. We will assume that you have their authorisation to do so. Where we request you to do

so, you must assist us with any requests by the individual to access or update the personal information you have collected from them and provided to us.

## 2. WHAT PERSONAL INFORMATION DO WE COLLECT, AND HOW AND WHY DO WE COLLECT, USE AND SHARE PERSONAL INFORMATION?

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The kinds of personal information we collect about you, and the reasons why we collect, use, and share it, depends on our relationship with you. If you choose not to provide us with any personal information we require from you, we may not be able to provide you with the products or services you have requested.

### COLLECTION AND USE

Below we explain in more detail the kinds of personal information we collect, the ways we collect it, and why we collect your personal information:

Generally (applicable to all types of individuals):

- **General collection:** we will collect your name, commentary or opinion about you, and other information relevant to providing you with the information, goods, and services (as applicable) you or someone on your behalf is seeking.
- **Sensitive Information:** Except as otherwise permitted by law, we only collect sensitive information (as that term is defined in the *Privacy Act 1988* (Cth), and interpreted in accordance with the *Privacy Act 2020* (NZ)) about you if you consent to the collection of the information and if it is reasonably necessary for the performance of our functions and activities. Consent may be implied by the circumstances existing at the time of collection. There may also be circumstances under which we may collect sensitive information without your consent, as required or authorised by law.
- **General purpose:** we collect, use, hold, and disclose your personal information if it is reasonably necessary for, or directly related to the performance of our functions and activities, and to facilitate our internal business operations, including:
  - establishing our relationship with you;
  - maintaining and managing our relationship with you, and communicating with you in the ordinary course of that relationship;
  - supplying you with information, goods and services;
  - updating your personal information, including destroying or de-identifying it when it is no longer relevant (to the extent applicable);
  - fulfilling our legal requirements, both at law and under our contractual arrangements with you;
  - for our staff training, monitoring and improving our products, services, websites, applications, and devices and, and maintaining our systems. This information is aggregated and de-identified wherever possible;
  - contacting you to send you a survey, or ask for your feedback or a testimonial;
  - dealing with any queries, complaints or requests; and
  - for any other purpose identified at the time of collection.
- **Secondary purpose:** We may use or disclose personal information for secondary purposes where it would be reasonable to expect us to do so, and that secondary purpose is related (or directly related in the case of Sensitive Information) to the primary purpose set out above.

If you are a customer:



- **Bookings:** When you book a product, request a quote, pick up a vehicle or check in (including via <https://portal.jucy.com/>) we will ask you for the personal information we need to give you what you want. This may include your name, contact details (email, address and telephone number), date of birth, drivers licence, passport, payment information and information about you and other drivers or other people you are travelling with. We need this information to provide you with products and services you have booked and to carry out our obligations relating to contracts between us or between you any third party.
- **Location data:** We may collect through global position system vehicle tracking and diagnostics (telematics) and other location information obtained from smartphones, tablets, sat-navs or other devices that monitor the vehicles current and previous geographic locations. This data is used to for the safety and security of our vehicle and to track the vehicle location, to understand and manage the location and security of our vehicle fleet and to assist with the management of accident or breakdown claims involving our vehicles.
- **Vehicle-sourced data:** We may collect information collected by data systems within a vehicle about its condition and performance (including mileage, fuel and other operational data) and operation of the vehicle, including your location, speed, time, fuel consumption and distances travelled. This information is used to understand and manage the performance of the vehicle.
- **CCTV:** Where you see signs at any of our physical locations telling you that CCTV cameras are in operation, we are collecting CCTV footage of our employees and customers. We need this information to ensure the safety of our property and employees.
- **Call recording:** When you call any of our customer numbers, we may record the call. We record these calls for training and customer service reasons, quality control purposes, to help you and to meet our contractual obligations.
- **Market research:** We sometimes ask our customers to take part in market research. Any additional personal details you give us as part of this research will only be used with your consent.
- **Public information:** We may also collect and use personal information that is publicly available, for example through social media, public directories, or review websites. We use this information to improve our services.
- **Customer reviews:** We may use your contact information to send you a short survey about your experience with us which will be sent by us or Customer Radar for JUCY Rentals customers [customerradar.com](http://customerradar.com). We also monitor and use customer reviews on review websites and social media. These help us understand and improve our service and products.
- **Public safety and fraud prevention:** We may use personal information to detect and prevent fraud and other illegal or unwanted activities including preventing unsafe drivers from hiring vehicles.
- **Other communications:** We may have to contact you by email, phone, or SMS, depending on the contact information we have for you, this could be:
  - So, we can respond to and deal with your queries, complaints, or requests.
  - So, we can deal with a damage claim which has occurred during your use of our products.
  - If you have not finalised a booking online, we may email or call you to remind you to do so. We see this as a useful service because it lets you carry on with a booking without having to find the product again or fill in all the booking details from scratch.
  - We may also send you other emails relating to your booking, such as where to pick up and information on contacting us if you need help.



- **Research:** We may from time to time aggregate and anonymise customer information to use ourselves or to provide to third parties for research, data analysis, statistical or other purposes.
- **Improving our services:** We use personal information for analytical purposes, to improve our services, to enhance the user experience, and to improve the functionality and quality of our websites.
- **Debt collection:** Collecting any debts you may owe us (we may also pass your details on to a third-party debt collection agency).
- **Fines/tolls:** To transfer any fines, tolls or penalties we have received in relation to your vehicle hire into your name we will send your personal information to fine and toll processing companies and/or the relevant local authority or government agency.
- **Damage claims:** Processing any damage or excess reduction claims, insurance claims, fines, tolls, or penalties in relation to your use of our products or services.

If you are a supplier:

- **Supplier:** we will collect your contact details, ABN (for sole traders and partnerships), business name, bank account details (for payment of your invoices), and information about your role, for the purpose of purchasing goods or services from you and enquiring about your products and services.

If you are a visitor:

- **Websites:** When you visit our websites we may collect certain information about you, even if you don't book a product. Please check out our Cookie Policy for further details about how we may collect personal information through cookies, internet tags or web beacons, navigational data collection (log files, server logs and clickstream data) or tracking technology. This information helps us personalise content and ads, provide social media features, analyse our traffic and understand and improve our website and products.

If you are a customer or visitor:

- **Marketing activities:** We may also collect your personal information for marketing activities through marketing and analytical services. We may use such personal information for marketing activities, as permitted by law. For example:
  - To contact you by email with information on our latest news, updates, special offers, discounts or promotions or competitions. You can opt out at any time by clicking "unsubscribe" in the email.
  - Based on the information you share with us, you may see personalised mobile apps or on third-party websites, including social media sites.

If you are an entrant:

- **Competitions and promotions:** If you enter any of our competitions and promotions, we may need to collect your personal information to process your entry, and to communicate with you about the competition or promotion and your entry.

If you are an applicant:

- **Employment applications:** If you apply for a job with us, we will need some of your personal information as part of the process of working out if you are the right person for us. Depending on your potential or actual position with us, the personal information we collect is personal information contained within an application and CV/resume, employment history, personal information derived from a reference, personal information derived from an interview, personal information derived through testing (including psychometric or aptitude testing, as applicable), licences and other certificates and qualifications, and information included in a



passport, birth certificate, visa or other documentation demonstrating your right to work in Australia.

### THIRD PARTY COLLECTION

We will generally collect personal information from you directly, including when you interact with us, such as in person, by email, by phone, by enquiry or feedback form, or via our website, social media channels, any of our standard forms (including application forms) contract negotiation, our surveys (where applicable). We may also need to collect personal information about you from third parties from time to time where it is necessary for us to do so and it is unreasonable or impractical to collect directly from you, where you have consented to us doing so, or where we are otherwise required to or authorised to by law. Those third parties include:

- if you are a customer: We may also collect your personal information through trusted parties such as travel agents to provide you with the products and services you have booked and to carry out our obligations in relation to these bookings.
- if you are a supplier: personal information that is publicly available, for example through public directories or review websites;
- if you are an applicant: referees when they provide references, academic institutions or training and certification providers, providers of licence and background-checking services, recruiters and other service providers who assist in the engagement process, and other publicly available sources such as social media platforms.

### 3. HOW AND WHY DO WE SHARE YOUR INFORMATION WITH THIRD PARTIES?

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We share your personal information with third parties in accordance with the purpose for which it was collected, or otherwise with your consent, as necessary to complete any transaction or to provide any information, product, or service you have requested, or as required or authorised by law.

Our third party service providers assist us in operating our business and providing information, resources, goods and services to you or someone else on your behalf. These include:

- IT and technology service providers;
- our trade agents and marketing and communications providers (who may contact you, process your booking on our behalf, manage aspects of our websites and call-centres and provide us with market research or analysis tools);
- third parties who facilitate payments, including fines and tolls processing agents and payment service suppliers; and
- insurers, IT and technology service providers, recruitment providers, and professional advisers such as lawyers, accountants, and auditors.

These third parties (some of whom may be located outside of Australia and New Zealand) include:

Company	Data	Use
Payment Express International Limited	Credit Card information	So we can process your payments
Alphabet Inc (google)	Name, Contact Details, Identification Details, Reservation Details, Browser, Location, Device and cookie information	So, we can identify you, provide the transactional information and marketing information to you
Hotjar Limited/ Log Rocket	Website clicks and cursor movements (no keystroke	So we can improve the user experience on our website



	information)	
The Rocket Science Group LLC (MailChimp)	Name, Contact Details, Reservation Details	So we can email you confirmations and important information about your reservation or offers from us
Rental Toll Manager	Name, Contact Details, Identification Details, Reservation Details	Only if you've been speeding or parking in the wrong place
GMH Systems PTY Ltd (Rental Car Manager)	Name, Contact Details, Identification Details, Reservation Details, Credit Card Information	So we can process your reservation
Road and Maritime Services NSW Australia	Reservation Details, credit Card information	So we can process any tolls you incur on toll roads in Australia
Customer Radar Limited	Name, Contact Details, Feedback Information	So you can tell us how we did
Cumulo9 Limited	Name, Contact Details, any email communications we've sent to you	So we can have a conversation via email
Telemax Pty Ltd	Vehicle Identification	So we can monitor vehicle performance & location to assist in emergency

In addition to the above, we may also share your personal information with the following entities for the following purposes:

Generally:

- **Other companies in the Travvia Group:** To support our provision of information, goods, and services to you and to enable us to perform our obligations.
- **Our workers:** our employees, contractors, consultants and other parties who require the information to assist us with the purposes for which it was collected, and with establishing, maintaining or terminating our relationship with you.
- **As required or authorised:** Where the law requires or authorises us to do so (whether in Australia, NZ or overseas), we may share your personal information with any third party, including without limitation government or investigative authorities if required by law (or any regulation having the force of law). Such requirements include court orders, subpoenas and orders arising from legal processes and criminal investigations. We may also disclose your personal information if it is strictly necessary for the prevention, detection or prosecution of criminal acts.
- **Agreed third parties:** third parties to whom you have agreed we may disclose your information and where the information was collected from you (or from a third party on your behalf) for the purposes of passing it on to the third party.
- **Expansion or reduction in business:** We may expand or reduce our business, and this may involve the sale and/or transfer of control of all or part of our business. Personal information, where it is relevant to any part of the business for sale and/or transfer, may be disclosed to a proposed new owner or newly controlling entity for their due diligence purposes, and upon



completion of a sale or transfer, will be transferred to the new owner or newly controlling party to be used for the purposes for which it was provided.

If you are a customer:

- **Other companies supplying you with products:** To complete your booking or provide you with help we may need to send your personal information to third parties who provide ancillary products or services you have requested or need (for example ferry tickets, roadside assistance, towing companies, or local mechanics).
- **Fines/tolls:** We will send your personal information to the relevant local authority or governmental agency so we can transfer any fines, tolls or penalties we have received in relation to your vehicle hire into your name.
- **Other people named in your booking:** To assist them while using our products or amending a booking.
- **Damage claims:** To process any damage or excess reduction claims, insurance claims arising through your use of our products we may need to share your personal information with the Police or insurance companies.
- **Driver safety:** We may share your personal information with other rental vehicle providers in the same or similar industries and/or governmental agencies if we believe that it is in the interests of protecting public safety such as for dangerous driving or theft.
- **Third party service suppliers:** We use third party service suppliers to process your personal information on our behalf for the purposes described above. For example, we may use them to contact you, or to send booking information on our behalf, to manage aspects of our websites, call-centres, or marketing activities. We also work with third party information technology service providers (including “cloud” providers or other types of networked or electronic storage), market research or analysis tools, marketing and communications providers, fines and toll processing agents and payment service suppliers to facilitate payment. We also work with third party advertisement networks to market services on other platforms and involve third party suppliers for analytical purposes. We will take reasonable steps to make sure that all these third parties are bound by confidentiality agreements and will not be allowed to use your personal information for any purposes other than those described above.
- **Bill/invoice:** If someone else pays your bill, such as your employer, that entity or person.

If you are an entrant:

- **Competitions and promotions:** organisations involved in the competitions or trade promotion, such as sponsors, partners, prize providers, technology service providers, and government regulators.

#### **4. TRANSFER OF YOUR INFORMATION – WHO/WHERE DO WE TRANSFER IT TO?**

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When you make a booking through our websites or if we collect information from you, we will process your information in New Zealand, Philippines and/or Australia and if you are not based in that country where the product you have booked is based we will need to transfer your personal information to the relevant country for the booking. We store personal information in our central data storage facilities in New Zealand and Australia. As part of the booking or purchase process some of your personal information will need to be transferred to members of the Travvia Group. Our disclosure of personal information to third parties may include the transfer of personal information between countries to complete transactions and/or perform our services and/or any of the purposes outlined in this privacy policy.

If we transfer personal information to another country, we will take appropriate measures to protect the personal information we transfer. By providing us with personal information, you understand and acknowledge that we transfer personal information to, store personal information in, and process





personal information in various countries worldwide.

## **5. WHAT SECURITY PROCEDURES DOES TRAVVIA GROUP HAVE IN PLACE TO SAFEGUARD YOUR PERSONAL INFORMATION?**

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We store information in different ways, including paper and electronic form. We take reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification, or disclosure. To do this we:

- Use only secure servers.
- Use industry standard encryption for the transmission of personal information on our websites and storage of your credit card details which are used as security. When Your credit card details are handled in compliance with PCI DSS 3.2 standards and are encrypted and securely stored by Direct Payments Solutions Limited and Auric Systems International using SSL protocol to allow a secure connection between your internet browser and our internet server, using a private key to encrypt the information.
- Require any third-party suppliers we use to comply with global data protection legislation relevant to the services they are providing.
- Ensure that our employees and service providers only have access to the personal information they need to do their jobs.
- Require our employees to be aware of our privacy expectations and to respond to any privacy breach.
- Take guidance from security best practice and regularly update our security policies in line with new threats.

We will retain personal information for as long as necessary to fulfil our obligations to you, to protect our legal interests, to comply with a law or as otherwise stated to you when we collected personal information.

Once we are no longer required to retain personal information, we will endeavour to take reasonable steps to destroy personal information or to ensure that personal information is de-identified.

## **6. IT'S YOUR CHOICE - HOW TO ACCESS & CONTROL YOUR PERSONAL INFORMATION**

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You can request a copy of the personal information that we hold about you by contacting us at [privacy@travviagroup.com](mailto:privacy@travviagroup.com). To keep your information safe, we may ask for further information to confirm your identity. We may decline a request for access to personal information in circumstances prescribed by relevant legislation. If we decline a request for access, where reasonable, we will provide you our reasons and information about your ability to complain about such refusal. If you believe the personal information we hold about you is incomplete, out of date, or inaccurate, please tell us (email the same address). If we agree that it is incomplete, out of date, or inaccurate (having regard to the purposes for which it was collected), we will take reasonable steps to correct the information.

There are no charges for requesting access to or the correction of your personal information, however we reserve our rights to charge you any reasonable administration fees associated with your request (where allowable at law). We will notify you in advance of any applicable fees.

You can “opt out” from:

- marketing and sales emails by clicking “unsubscribe” in any of these emails.
- cookies - check out our Cookie Policy for more information.

In some circumstances, you have the right to ask us to stop using and/or delete your personal information. If you want to do this, please contact us at [privacy@travviagroup.com](mailto:privacy@travviagroup.com).





## **7. PRIVACY OFFICER**

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Our privacy officer can be contacted at: [privacy@travviagroup.com](mailto:privacy@travviagroup.com) or Privacy, Travvia Group, PO Box 68199, Victoria Street West, Auckland, NZ, 1010 or 0800 399 736 (NZ toll free).

## **8. LODGING A COMPLAINT**

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Complaints about our Privacy Policy or the way we handle your personal information should first be directed to us at the details set out above. We will investigate and attempt to resolve your complaint in accordance with the relevant legislation.

If you are not satisfied with the outcome of this process, then:

- (for Australian individuals) you may contact the Office of the Information Commissioner, Australia. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.
- (for New Zealand individuals) you have the right to lodge a complaint with the office of the New Zealand Privacy Commissioner if you feel your privacy has been breached. You can find more information on the complaint process at <https://www.privacy.org.nz/your-rights/making-a-complaint-to-the-privacy-commissioner/>.

## **9. CHANGE IN POLICY**

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We may need to amend the terms of this Policy if our practices change. If we do so, we will post the updated version on our websites (at [www.jucy.com](http://www.jucy.com) and [www.starrv.com](http://www.starrv.com)) and may also contact you via e-mail if the change is material.

If you have any questions about our privacy policies this Privacy Policy or any other matter, please contact us using the contact details contained in this Privacy Policy.

