

# DCA Privacy Policy

DCA respects people's privacy. DCA is bound by the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (the **Privacy Act**), as well as other applicable laws protecting privacy. DCA will ensure that all the personal information that it handles is managed in accordance with those laws.

In this Privacy Policy:

**DCA** means Sarb Management Group Pty Ltd (ACN 106 549 722) trading as Database Consultants Australia, each company in which Sarb Management Group Pty Ltd, owns (directly or indirectly) more than 50% of the voting shares; and each trust in which Sarb Management Group Pty Ltd, owns (directly or indirectly) more than 50% of issued units;

**personal information** means information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

This Privacy Policy describes how DCA manages personal information. DCA may modify or update its Privacy Policy from time to time by publishing it on DCA's websites (including <http://www.data.com.au> and <http://www.paystay.com.au>). DCA encourages individuals to check the DCA and PayStay website periodically to ensure that they are aware of DCA's current Privacy Policy.

## What personal information does DCA collect and why?

DCA collects the personal information it needs to provide services and information to its customers and the community, for its business operations (including the operation of PayStay) and to comply with the law. If an individual chooses not to provide certain personal information to DCA, DCA may not be able to provide the individual with certain services or information relating to PayStay.

Generally, if appropriate, DCA will tell an individual why DCA is collecting personal information when DCA collects the information and how DCA plans to use the information, or these things will be obvious when DCA collects the information.

The following are the main types of personal information collected by DCA and the main purposes for which they are collected.

### To provide its services and products including the PayStay service

DCA may collect information about an individual such as his or her name and contact details (including mobile phone number), date of birth, payment and billing information, credit card number, vehicle registration number, vehicle make, model, year, colour, and information about his or her use of DCA services and PayStay services including the date and time of use. DCA may use this information to supply its services, operate PayStay

and collect payment for use of parking and the PayStay service.

### To comply with the law

DCA may collect information about an individual as required or permitted by law. For example, DCA is required by law to keep certain records, including information about the payment and non-payment of parking services.

### To assist with queries

An individual may provide DCA with his or her name or other contact details when he or she calls DCA by phone, writes to DCA or contacts DCA using its websites so that DCA can respond to requests for information about customer accounts, its services and PayStay. For example when an individual makes an enquiry using a DCA website or by calling the PayStay Call Centre, he or she may be asked to provide a name, email address, telephone number and other contact information.

### As part of DCA's general business operations

DCA also collects personal information about individuals who are contracted to, or employed by, DCA, DCA's suppliers (including third party service providers), related companies, agents and customers. As required, this information may include an individual's name contact details and other information necessary for DCA to conduct business or maintain an employment relationship with that individual. As necessary and where appropriate, DCA

may require employees to undergo certain periodic or occasional medical checks.

#### **To consider an application for a job with DCA**

When an individual applies for a job or contract with DCA, DCA may collect certain information from the individual (including his or her name and contact details, information about his or her working history and relevant records checks), from any recruitment consultant and from the individual's previous employers and others, including referees and publicly available sources, that may be able to provide information to DCA to assist DCA in its decision on whether or not to make the individual an offer of employment or engage the individual under a contract. As necessary and where appropriate, DCA may require prospective employees to undergo certain medical checks. This Privacy Policy may not apply to acts and practices in relation to employee records of DCA's current and former employees, which may be subject to the employee records exemption in the Privacy Act.

#### **How does DCA collect personal information**

DCA will generally collect information directly from the individual to which it relates. However, DCA may collect information about an individual from a third party, such as when provided DCA's clients which may include corporate entities, government organizations or agencies or other organisations to whom DCA provides its services. DCA may supplement the information it collects with information from other sources, such as generally available publications.

#### **How does DCA use and disclose personal information?**

DCA generally uses and discloses personal information for the purposes for which it was collected, in order to provide DCA services and deliver PayStay (including as described above), to recover fees payable under your customer service agreement, for debt collection and enforcement purposes, to investigate or to pursue any legal claim that we or may have against you, or as otherwise required or authorised by law.

DCA discloses certain personal information to its clients where required by legislation.

When DCA collects personal information, it may sometimes also use that information to carry out market research and other analysis so that DCA can improve its services and improve the operation of PayStay. As part of conducting DCA's business,

personal information may also be used to maintain and develop DCA's business systems, including testing and upgrading them.

DCA Customer Relations may use an individual's personal information to keep the individual up to date with information about DCA services and PayStay. If the individual does not want DCA to use their personal information in this way or to be sent any further information, the individual can always let DCA know by unsubscribing from emails or contacting DCA Customer Service using the contact details given below.

DCA may de-identify information about an individual so that the information can no longer be related to that individual. DCA may then use and disclose that de-identified information in the course of its business. DCA may also aggregate information on the use of its services and PayStay (for instance, Parking Facility use) in such a way that no information identifying an individual is disclosed and may use and publicly disclose such aggregated information.

Where appropriate, DCA may handle personal information relying on exemptions that are available under applicable privacy laws, including, for example, the employee records exemption in the Privacy Act and provisions in the Privacy Act concerning the sharing of personal information among related bodies corporate.

#### **Disclosing personal information**

For the purposes described in this policy, DCA may disclose personal information:

- subject to any restrictions imposed by any relevant legislation, among the DCA entities named in this Privacy Policy and their related entities (including related entities located internationally);
- under legislative requirements such as with the local governments who operate Parking Facilities;
- to DCA's suppliers, service providers, professional advisers and agents. The types of suppliers DCA may disclose personal information to include:
- call centre operators;
- mailhouse organisations;
- contractors
- support and maintenance and logistics contractors;

- debt collection companies and credit reporting bodies;
- information technology suppliers that provide support, maintenance and upgrade services for DCA systems; and
- direct marketing contractors;
- to government agencies and any entity responsible for the collection of parking fees or the taking of enforcement action concerning use of Parking Facilities;
- to anyone to whom DCA's assets or business (or any part of it) is transferred;
- where an individual to whom the personal information relates has otherwise consented; or
- as otherwise required or permitted by law. For example, DCA may disclose information in response to a subpoena, warrant, or request from a government law enforcement agency, or as required under legislation and regulations. DCA may disclose information to AUSTRAC under applicable anti-money laundering legislation if you have an account balance above \$5,000.

#### **Cross-border disclosures**

DCA may disclose information to recipients that are located outside Australia. DCA may disclose personal information to overseas contractors, and may use off-shore servers for the purposes of data storage. DCA has engaged contractors in the Philippines, the United States and certain other countries, and may disclose certain personal information to those contractors. DCA may also disclose certain personal information to related entities internationally, although such information will typically only relate to employees and internal corporate matters and not customer information or the operation of PayStay in Australia. DCA will take commercially reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

#### **Cookies and IP address tracking**

DCA's websites may use cookies for site administration purposes. If for any reason an individual wishes not to take advantage of cookies, the individual may have his or her browser not

accept them (although this may disable or render unusable some of the features of a DCA website). DCA's websites may also detect and use an individual's IP address or domain name for internal traffic monitoring and capacity purposes or to otherwise administer the website. No personal information is obtained, rather the patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content based on aggregate or statistical review of user site traffic patterns.

#### **Links to other sites**

A DCA website may contain links to other websites. DCA is not responsible for the privacy practices or the content of such other websites. The privacy policies applicable to such other websites may differ substantially from this Privacy Policy, so DCA advises individuals to read them before using those websites. DCA will not be liable for any use of those websites.

#### **Security**

DCA implements a number of physical and electronic measures to protect personal information. We restrict access to our electronic databases, maintain firewalls and encrypt certain data where practicable to do so. Please note, however, that the internet is not a secure environment and although all care is taken, DCA cannot guarantee the security of information provided to it via electronic means.

#### **Access and correction and complaints handling**

An individual has a right to access most personal information that DCA has about that individual. In some circumstances it may not be possible for DCA to provide the individual with all of his or her personal information or an exemption under the Privacy Act may apply. For instance, DCA may not provide access to information if disclosing that information would impact on the privacy of another individual. Where DCA will not provide access to personal information held about an individual, DCA will tell the individual why.

When an individual requests access to personal information, DCA may need to take measures to verify the individual's identity before providing them with such information. If an individual thinks that any personal information DCA holds about him or her is inaccurate, the individual may contact DCA Customer Service and DCA will take reasonable steps to ensure that the information is corrected. DCA can correct most personal information over the

telephone, but correction requests may need to be made in writing in some cases. If an individual wishes to make a complaint about the way DCA has handled his or her personal information (including if the individual thinks DCA has breached the Privacy Act) the individual may do so by contacting DCA Customer Service in writing, by mail or email to the address or email address set out at the end of this Privacy Policy. If a complaint is made, please include contact details such as email address, name, address and telephone number and clearly describe the complaint. DCA Customer Service will investigate the complaint and respond promptly. If the complainant considers that DCA has failed to resolve the complaint satisfactorily, the complainant can complain to the Office of the Australian Information Commissioner. As at the date of this Privacy Policy, the Office of the Australian Information Commissioner's contact details are as follows:

Mail:

Sydney Office  
GPO Box 5218 Sydney NSW 2001

Canberra Office  
GPO Box 2999 Canberra ACT 2601

Telephone:

1300 363 992

Email:

[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Website:

<http://www.oaic.gov.au/>

For access and correction enquiries and complaints, please contact DCA Customer Service using the contact details provided below.

**Anonymity**

Where it is lawful and practicable, DCA will provide an individual with the option to deal with DCA and use PayStay without identifying themselves.

**Contact Details – DCA Customer Service**

Attn: DCA Privacy Officer  
P. O. Box 837, North Melbourne, VIC 3051  
Phone: 03 9320 9000  
[admin@data.com.au](mailto:admin@data.com.au)

**DCA Products and Services**

