

# Mobility Mutual.

## Mobility Mutual Privacy Policy

**November 2022**

This policy sets out how Mobility Mutual Limited (“Mobility Mutual”; “we”) manages your personal information (as defined under the Privacy Act 1988 (Cth) (“Privacy Act”) (“Personal Information”).

### The information we collect

Mobility Mutual works closely with Uber Carshare and its affiliate, Carshare Support to offer you discretionary risk protection. Carshare Support manages Mobility Mutual’s discretionary risk activities on a day-to-day basis in accordance with the Mutual’s instructions and directions.

We, or Carshare Support on our behalf, may collect and hold identifying information such as name, age, gender, telephone number and email address, plus banking/credit card information, driver’s licence details, photographs of you (which you will need to submit as part of the online application process) and driving history.

If you register as an Owner member, we or Carshare Support on our behalf, will also collect details about your vehicle including registration details, make, model, colour, year of manufacture, VIN as well as a record of any existing damage. The in-car unit installed in cars will track GPS coordinates, which we, or Carshare Support on our behalf, use to calculate distance travelled by Borrowers and to ensure the Vehicle is in the correct location prior to the start of a Booking. This data will be retained for a reasonable period of time. The GPS data will not be disclosed to any member (other than where necessary to confirm the location of the vehicle at the start of, or outside of, a valid booking) or any other third party, except where we are legally obliged to do so or where it is required for law enforcement.

### How we collect your information

We, or Carshare Support on our behalf, may collect your information in a number of ways, including:

- directly from you (such as where you provide information to us when you visit the Carshare Support or Mobility Mutual website, complete an application form or agreement for one of our or Carshare Support’s services, or contact us or Carshare Support with a query or request),
- using log files and cookies, as set out below;
- from third parties such as service providers or partners. from publicly available sources of information; or
- from our records of how you use our, or Carshare Support’s services.

If you choose not to provide certain information about you, we may not be able to offer discretionary risk protection cover you require because we may not accept your application for membership to Mobility Mutual.

## How we hold your information

We, or Carshare Support on our behalf, may store your information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We take reasonable steps to maintain the security of your information and to protect it from unauthorised disclosures.

## Use of Information and Information Verification

We, or Carshare Support on our behalf, will use your Personal Information to provide and improve the discretionary risk protection offered by Mobility Mutual and provide a secure and trusted experience. That includes use of your Personal Information:

- to offer you the benefits of discretionary risk protection by the Mutual;
- to facilitate your application for, and management of, membership to the Mutual, and any claims handling assistance you might require;
- to facilitate our administration and operation of the Mutual;
- to understand better how members engage with the Mutual;
- to verify your identity and account information, or to conduct appropriate checks including fraud checking, investigation and risk assessment;
- to process your requests and transactions, to charge and bill you for your use of our service, and to collect any amounts you may owe us;
- to provide you with information or services you request; and
- to inform you about other promotions or products or services we think will be of interest to you.

We, or Carshare Support on our behalf may use third party services to verify the information you provide to us and to obtain additional related information and corrections where applicable.

We may share information with service providers who are engaged by or working with us in connection with the processing or collection of payments, operation of our services and support functions who need access to such information to carry out their work for us.

## Marketing

We may use Personal Information provided to tell you things we think you might be interested in.

Examples where we may use your Personal Information for marketing purposes include:

### **Direct Marketing** (including Promotional Emails)

When you sign up as a member of Uber Carshare, we'll use the email address you have provided us with to contact you with promotional emails. Promotional emails may include information about our services, special offers or relevant content. It may also include information from third parties where we think this information is relevant to you. We may use information you've provided us – such as your location – or information based on your website behaviour or purchase history to decide what emails may be most relevant to you.

If you wish to opt out of promotional emails, please contact us by email at [members@ubercarshare.com](mailto:members@ubercarshare.com) or click the unsubscribe link in the content of the email. You may not opt-out of receiving service-related emails.

## Online Ad Campaigns

We may use the information you've provided us to target advertising on online platforms, including Google Ads Network and social media sites such as Facebook. This could include using information about how you've behaved on our website via the use of cookies, or Personal Information which you have provided such as your email address.

## Log Files

Like many other sites, our site (mobilitymutual.com.au) and Uber Carshare's site (www.ubercarshare.com) make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and number of clicks to analyze trends, administer the site, track user's movement around the site, and gather demographic information. Carshare Support on our behalf combines the anonymous information collected through third-party services with personally identifiable information, but only if you provide your email address, and only for the purposes of linking your user or member profile to the sites, web pages or advertisements that contributed to your using our website. We, or Carshare Support on our behalf, use this information to improve our product, advertising and marketing.

## Use of Cookies and website analytics.

To improve your experience on the Mobility Mutual and Uber Carshare sites, we, or Cashare Support on our behalf, may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Uber Carshare website.

Our website uses Google Analytics and Mixpanel, services that transmit website traffic data to servers outside of Australia. The reports provided by these services are used to help us, and Carshare Support on our behalf, understand website traffic, webpage usage and the usage of our service.

By using the Mobility Mutual and Uber Carshare websites and Uber Carshare's platform, you consent to the processing of data about you by Google and Mixpanel for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google- \(external site link\)](#).

When you visit the Mobility Mutual and Uber Carshare websites, third parties may place cookies on your browser or use similar tracking technologies (such as advertising IDs in environments that do not support cookies) and may send their own cookies to your cookie file. These record standard internet traffic information to serve targeted advertising on sites across the Internet. Examples of these include Google Tracking Cookies and Facebook's Pixel. You can learn more about managing your preferences for Google Tracking Cookies [here](#) and Facebook Pixel [here](#).

## Aggregated data

We may compile aggregate data about the use of Mobility Mutual's membership and services. Information about how you use a service may be collected and combined with information about how others use the service. Aggregate data helps us understand trends and our members' needs so that we can develop and improve our services. We may share anonymised aggregate information with advertisers and partners. This policy does not limit our collection and use of aggregate information that does not identify any individual.

## Maintaining the Quality of your Personal Information

It is an important part of providing our services to you that your Personal Information is up to date. It is important that you advise us at the earliest opportunity of any changes to your Personal Information so that our records can be updated.

## Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. Your Personal Information will be stored on the servers of our PCI Level 1-compliant technology service provider.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.

## Access to your Personal Information

You may request access to Personal Information about you that we, or Carshare Support on our behalf, hold and you may ask us to correct your Personal Information if you find that it is not accurate, up-to-date or complete. You may also make a complaint about our, or Carshare Support's handling of your Personal Information. These services are free of charge.

If you wish to close your account or cancel your application and request deletion of your personal information, please send an email to [members@ubercarshare.com](mailto:members@ubercarshare.com).

Please note that we may be unable to delete information that we need to comply with applicable laws, detect or prevent fraud, collect any fees owed, resolve disputes, assist with or process claims, troubleshoot problems, assist with any investigation, comply with audits and investigation, enforce our Membership Agreements and Policies and take other actions reasonably necessary, permitted, or required by applicable law. There may also be residual information that will remain within our databases and other records, which will not be removed.

To protect your privacy and the privacy of others, we will need evidence of your identity before we can grant you access to information about you or change it.

You can contact us by email at [legal@mobilitymutual.com.au](mailto:legal@mobilitymutual.com.au).

## Disclosing Your Information

We, or Carshare Support on our behalf, may disclose your Personal Information to third parties:

- where we sell any or all of our business and/or our assets to a third party;
- where we are legally required to disclose your information;
- with your consent, when we conduct marketing activities with third parties; or
- to assist fraud protection and minimise credit risk.

We, or Carshare Support on our behalf, may also disclose your name and contact information to other members of Uber Carshare in order to facilitate the smooth operation of the service. Please see the latest Member Agreement and Owner Supplement for more details. These documents are available on the website (<https://www.ubercarshare.com/terms-of-use>)

## Changes to This Privacy Policy

We may change this privacy policy from time to time. When we do, we will post the change(s) on our website. We suggest that you visit our website regularly to keep up to date with any changes.

## Complaints

You can lodge a complaint with us about any breach of our Privacy Policy and our privacy obligations to you by contacting us by email at [legal@mobilitymutual.com.au](mailto:legal@mobilitymutual.com.au).

## Opt-out of emails

If you wish to opt out of marketing and promotional emails, please contact us by email at [members@ubercarshare.com](mailto:members@ubercarshare.com) or click the unsubscribe link in the content of the email. You may not opt-out of receiving service-related emails.

## Contact Us

If you have questions or concerns about this Privacy Policy, contact us at [legal@mobilitymutual.com.au](mailto:legal@mobilitymutual.com.au). Our full contact details are available on our website (<https://www.mobilitymutual.com.au>).

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (“AFCA”). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Website: [www.afca.org.au](http://www.afca.org.au)

Telephone: 1800 931 678 (free call)

Email: [info@afca.org.au](mailto:info@afca.org.au)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

## Your Consent

By using the Uber Carshare site and/or applying to become a member of Mobility Mutual or Uber Carshare, you consent to the collection and use of information as outlined in the above documentation.