

## Privacy Policy

### 1. Introduction

This Privacy Policy (**Policy**) applies to all personal information collected and managed by Fleetwood Limited and each of its subsidiary companies' (collectively '**Fleetwood Australia**').

Fleetwood Australia operates three businesses: *Building Solutions*, *Community Solutions* and *Recreational Vehicle Solutions*. Our key activities include:

- design, manufacture and delivery of innovative and sustainable building solutions;
- village accommodation with contactless room check-in and access using smartphones;
- the supply of recreational vehicle parts and accessories in Australia and New Zealand; and
- the service of caravans and motor homes.

This Policy explains the kinds of personal information Fleetwood Australia collects and holds, how and why we collect and hold personal information, how we use and disclose it, and what controls you have over our use of it.

In this Policy, '**personal information**' has the meaning defined in the *Privacy Act 1988* (Cth) (**Privacy Act**). It includes your name, phone number, address and any other information that identifies you.

### 2. Personal information we collect

We aim to only collect personal information necessary to carry out our business. Fleetwood Australia may collect personal information from customers, clients, contractors, suppliers and other third parties.

The type of personal information we collect will depend on your dealing with us and may include:

- **Identifying and contact information**, including your name, address, telephone number, email address, gender, date of birth and place of work;
- **Employment related information**, including your qualifications, employment history, interests, resume, birth certificate, passport, tax file number and information about your residency or working rights;
- **Financial information** including your bank account details, annual income, credit history and transaction history;
- **Location data**, including records of your times of entry and exit, and visual images and recordings collected through security surveillance systems (described below) at Fleetwood Australia sites;
- **Other information**, including your preferences to our services, products and marketing material, IP address and browsing information (described below) and other information you provide to Fleetwood Australia in your dealings with us.

We may collect personal information about you:

- **directly**, including when you interact with us over the telephone, an online meeting platform (like Zoom or Microsoft Teams) or visit our site; apply for a role at Fleetwood Australia; sign up to our mailing lists or respond to our surveys;
- **indirectly**, including when you use our websites, accommodation management systems (described below), applications, or interact with us through social media; and/or
- **through a third party**, including your employer when providing accommodation services; a credit reporting agency, third party broker, business partner or government agency.

## 2.1. Security surveillance systems

To comply with law, we operate security surveillance systems in some vehicles operated by our employees and contractors. For safety and security purposes, these systems may collect images and video recordings of our drivers as well as members of the public, in the event of incidents occurring.

We also operate security surveillance systems at our sites. If you are a Fleetwood Australia employee, contractor, customer, client or otherwise visit our sites, your image, location and activity may be captured by these systems that collect visual images and recordings. To manage the security of our premises, this information may be monitored by us, searched using AI functionality (for example, to identify when a particular incident occurred), and provided to third parties including law enforcement agencies and insurers in certain circumstances.

The main purpose of these security surveillance systems is to maintain a safe and secure environment for our employees, contractors, customers, clients and visitors. Fleetwood Australia does not collect, hold, use or disclose audio recordings, biometric information or utilise facial recognition technology or any other biometric matching technology.

## 2.2. Systems operated by mobile phone or access card

When you are using one of our systems that operates by way of mobile phone application or access card, we may collect personal information such as your precise location data, your movements in, out of, within and around the physical area for which the system is used, and some of your activities.

Such systems, when used at Fleetwood Australia owned or operated accommodation facilities:

- may collect personal information data about your use of facilities within and around the physical area for which the system is used, the number of times and when you visit, what you do when you visit (such as going to the gym, visiting the kitchen). We collect this type of data to deliver the intended functionality of the system, and it also allows us to continuously improve the systems which we offer to customers, clients and their employees.
- by way of a mobile phone application, may collect data about you through your mobile device. When your mobile device syncs with our applications or software, data recorded on your mobile device (inclusive of personal information) is transferred from your device to our servers.

In each case, we will only use such information or data collected in accordance with and for the purposes set out in this Policy, or as permitted by the law.

## 2.3. Cookies and links

Fleetwood Australia collects information from the internet using 'IP files'. When you visit any Fleetwood Australia website to read, browse or download information, our system will record/log your IP address (the address which identifies your computer on the internet and which is automatically recognised by our web server), date and time of your visit to our site, the pages viewed, and any information downloaded.

This information will only be used for the purpose of site analysis and to help us offer you improved online service. We may automatically collect non-personal information about you such as the type of internet browsers you use or the site from which you linked to our websites. You cannot be identified from this information, and it is only used to assist us in providing an effective service on our websites.

Our websites may contain links to other third-party websites which may collect personal information about you. Fleetwood Australia is not responsible for the privacy policies of other businesses or the content of websites that are linked to our websites.

## 3. Use and disclosure of personal information

We collect, hold, use and disclose personal information for the provision of our services, including administration of our services, village accommodation services, functions associated with village accommodation services (including the Glyde® energy management and keyless access entry system), notification to you about changes to our services, record-keeping following termination of our services to you, technical maintenance and for marketing purposes (with your consent).

Our activities which are likely to involve the use or disclosure of personal information include the supply of products, customer inquiries and customer account management.

We also use personal information such as location data and facilities use data to tailor services which we offer to you and make your use of those services more personal to you. Further, we use personal information collected to develop, test and improve our services, including by testing and troubleshooting new services and features. We may use personal information to generate aggregated statistics and insights into use of our facilities and services that help us and potentially third parties enhance the use and design of those facilities and services.

We may transfer personal information to our corporate affiliates, service providers, and other partners who process it for us, based on our instructions, and in compliance with this Policy and any other appropriate confidentiality and security measures.

Personal information is only disclosed to persons outside our business in the circumstances set out in this Policy or as otherwise notified to you.

We will not use or disclose your personal information for any purpose other than the purpose for which it was collected (or a related purpose) unless you have consented to that purpose, or we are permitted to do so by law.

#### **4. Marketing communications**

If you have provided consent, Fleetwood Australia, and/or our third party service providers, may use your personal information to send you marketing communications about:

- Fleetwood Australia's offers, promotions, products, services, research or surveys; and
- information about third party offers, promotions, products, services, research or surveys complimentary to Fleetwood Australia's businesses.

##### **4.1. Unsubscribe / Opt out**

At any time, you may unsubscribe from receiving any specific or all marketing material from Fleetwood Australia. You can do this by:

- choosing to unsubscribe or opt out using the unsubscribe links in our communications; or
- by contacting our Privacy Officer using the contact details below.

Attn: General Counsel & Company Secretary  
Level 8, 383 Kent Street  
Sydney NSW 2000  
Email: [companysecretary@fleetwood.com.au](mailto:companysecretary@fleetwood.com.au)  
Telephone: (02) 9071 1300

#### **5. Security and storage**

Fleetwood Australia places great importance on the security of all information collected, including personal information. Where we no longer require your personal information for business or legal reasons, we will take reasonable steps to destroy or de-identify it.

We have implemented security measures to protect against the loss, misuse and unauthorised alteration or access of personal information under our control, including the storage of such information on secure servers in controlled facilities. Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.

Hard copy documents with personal information are generally held on site, in storage cabinets and safes, depending on the nature of the document.

No data transmission over the internet however can be guaranteed to be 100% secure. Whilst Fleetwood Australia strives to protect users' personal information, we cannot ensure or warrant the security of any information transmitted to or from our online products or services, and users do so at their own risk.

## 6. Access to and correction of personal information

Fleetwood Australia is committed to maintaining accurate, timely, relevant and appropriate information about our customers, clients and website users. You may request for your personal information in accordance with the Privacy Act, by contacting our Privacy Officer using the contact details below.

Attn: General Counsel & Company Secretary  
Level 8, 383 Kent Street  
Sydney NSW 2000  
Email: [companysecretary@fleetwood.com.au](mailto:companysecretary@fleetwood.com.au)  
Telephone: (02) 9071 1300

Inaccurate information will be corrected upon receiving advice to this effect from you. To ensure confidentiality, details of your personal information will be provided to you only if we are satisfied that the information relates to you.

If we refuse to provide you with access or to correct the personal information held about you by us, then we will provide reasons for our refusal.

## 7. Complaints

If you have a complaint about how your personal information is handled by Fleetwood Australia or this Policy, in the first instance, your complaint should be directed to our Privacy Officer:

Attn: General Counsel & Company Secretary  
Level 8, 383 Kent Street  
Sydney NSW 2000  
Email: [companysecretary@fleetwood.com.au](mailto:companysecretary@fleetwood.com.au)  
Telephone: (02) 9071 1300

We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of your personal information.

If you are not satisfied with the outcome, you may then request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

## 8. Transfer of information overseas

Fleetwood Australia may in limited circumstances disclose your personal information to reliable overseas service providers to perform administrative services or functions on our behalf, such as data storage. The countries in which these overseas recipients are likely to be located include New Zealand and the Republic of Philippines.

We will take reasonable steps to ensure our overseas recipients comply with the Privacy Act and this Policy and do not use such personal information for their own purpose.

## 9. Review

This Policy will be reviewed and updated by Fleetwood Australia's Board periodically to reflect changes in applicable laws or in our privacy compliance practices.

## 10. Contact our Privacy Officer

If you have any questions regarding how Fleetwood Australia handles your personal information or this Policy, please contact our Privacy Officer:

Attn: General Counsel & Company Secretary  
Level 8, 383 Kent Street  
Sydney NSW 2000  
Email: [companysecretary@fleetwood.com.au](mailto:companysecretary@fleetwood.com.au)  
Telephone: (02) 9071 1300