

Privacy Policy

Dated 06 August 2018

1. Our commitment to your privacy

We understand that your privacy is very important to you and that when you agree to us collecting, holding, using, and exchanging your personal information you are putting a lot of trust in us; and your trust is very important to us. That's why we are committed to strictly protecting your privacy and being open and transparent about what we do with your personal information.

2. This policy

This privacy policy explains what kind of information we collect and hold, how and why we collect, hold and use it, and how and to whom we disclose that information. It also provides details about how you may access and seek correction of the personal information that we hold about you, and what you can do if you are not satisfied with how we have dealt with your personal information.

3. Collecting your information

During the course of our business we collect and hold information about our customers, including former and potential customers. This information is usually personal information (any information including sensitive information from which your identity is apparent) and credit information (for more on credit information please see section 6 Credit checks and credit reporting). Generally, we only collect personal information from you, unless it is not reasonable or practical to do so.

Information we collect from you

We collect information about you and your interactions with us, for example if you make an enquiry or request information from us, if you apply for credit or use your credit facility, and when you phone, email or write to us, or visit our website. When you use our website, we may collect information about your location or activity including IP address, and whether you have accessed third party sites. Some of this website information we collect using Cookies (for more information please contact our IT department). The information we collect from you may include your identity and contact details, other personal details such as gender, marital status and prior addresses, current and prior employment information, and financial information including income, assets, financial commitments and credit history.

Information we collect from others

We collect information about you from others, such as credit reporting bodies, other credit providers, agents, advisers, brokers, service providers, your employer, family members and friends. For example, when you apply for credit, we will need to obtain a credit report from a credit reporting body, and if we later have trouble getting in contact with you we may ask your provided references (a family member or friend) for your contact details. We may also collect information about you that is publicly available, for example from public registers, or social media.

Sensitive Information

Information which is classified as sensitive information includes health information about an individual. In some cases we collect sensitive information for specific purposes. For example, in assessing an application you make for hardship relief, we may collect information about your health.

4. Using your information

We collect, use and exchange your information so that we can:

- establish your identity;
- assess your application for credit;
- manage the credit provided to you;
- manage our relationship with you;
- contact you;
- identify and tell you about other products or services that we think may be of interest to you;
- conduct, manage and improve our business;
- improve our customers experience with us;
- design, price and administer our products and services;
- manage our risks and help identify and investigate illegal activity, such as fraud; and
- comply with our legal obligations and assist government and law enforcement agencies or regulators. We may also collect, use and exchange your information in other ways where permitted by law.

Direct marketing

If you don't want to receive direct marketing, please contact us and advise.

5. Exchanging your information

We may exchange (i.e. collect from and disclose to) your personal and credit information with the following parties for the following purposes.

Third parties

We may exchange your information with third parties where this is permitted by law or for any of the purposes mentioned in section 4 using your information. Third parties include:

- credit reporting bodies;
- other credit providers;

- any person who proposes to guarantee, or has guaranteed, repayment of any credit you have applied for or which has been provided to you;
- finance brokers, mortgage managers, agents and persons who assist us to provide our products to you;
- financial consultants, accountants, lawyers and advisers; • persons acting on your behalf, for example guardians and persons holding power of attorney;
- any industry body, tribunal, or court;
- businesses assisting us with funding for loans;
- any of our associates, related entities or contractors;
 - trade insurers;
- your referees, for example your current or former employer, real estate agent or landlord, family members or friends;
- any person considering acquiring an interest in our business or assets;
- any organisation providing online verification of your identity;
- service providers, for example mortgage insurers;
- those to whom we outsource certain functions, for example, postage, direct marketing, statement production, debt recovery and information technology support;
- persons involved in arrangements that provide funding to us, including persons who may acquire rights to our assets (for example loans), investors, advisers, trustees and rating agencies;
- claims-related providers, such as assessors and investigators, who help us with claims;
- other financial institutions, for example so that we can process a claim for mistaken payment;
- auditors, insurers and re-insurers;
- government and law enforcement agencies or regulators;
- entities established to help identify illegal activities and prevent fraud; and
- any person where we are required by law to do so.

Special Needs

If you have special needs, we may share your information with your parent or legal guardian or any person appointed to manage your affairs.

Sending Information Overseas

Occasionally we may send your information overseas, but only directly to our own offices or agents in an overseas location, and to service providers or other third parties who operate or hold data outside Australia. Where we do this, we make sure as far as reasonably possible that appropriate data handling and security arrangements are in place. Please note that Australian law may not apply to some of these entities.

6. Credit checks and credit reporting – ‘notifiable matters’

In order to assess your application for credit, or proposal to be a guarantor, we need to be able to determine whether you can meet the repayments required under the proposed finance contract. Similarly, if you later apply for further funds we need to ensure such an increase of credit will not put you in financial hardship. As part of our assessment of your application we will need to get your credit report.

Credit Reports and Credit Information

As well as personal information, a credit report contains credit information about you. This is information about your credit history and includes the type and amount of credit provided to you, repayment history information, default information (including overdue payments) and court information. Credit reports and credit information helps credit providers, like us, assess your credit applications, verify your identity and manage your account(s). Credit reporting bodies collect and exchange this information with credit providers, like us, and other service providers such as telecommunication companies and utilities providers. Information that we exchange with credit reporting bodies – credit-related personal information. The information we exchange includes your identification details, what type of credit you have, how much you’ve borrowed, whether or not you’ve met your repayment obligations (repayment history information), whether any payments (of more than \$150.00) are overdue by 60 days or more, and if you have committed a serious credit infringement (such as fraud). We may also ask the credit reporting body to provide us with an overall assessment score of your creditworthiness. The credit reporting body we use in Australia and New Zealand is Equifax Inc. You can download a copy of their privacy policy via their website: www.equifax.com. You can also get a copy of your credit report from www.mycreditfile.com.au.

Using your credit-related personal information

We use information from credit reporting bodies to confirm your identity, assess your application for credit, manage that credit provided to you and our relationship with you, collect overdue payments, and to locate you if we cannot contact you. We also use this information as part of arriving at our internal and overall risk assessment of your creditworthiness. Your credit-related personal information is stored with your other personal information that we hold about you (for more information please see section 7 Security).

You may seek access to and request us to correct your credit-related personal information that we hold about you (for more information please see section 9 Accessing, correcting and updating your information). You may make a complaint to use about your credit-related personal information (for more information please see section 10 Complaint Resolution).

7. Security

We will take all reasonable steps to protect your personal information (including credit-related personal information) from misuse, loss, unauthorised access, modification or disclosure. We will destroy or

permanently de-identify personal information we no longer need or which we are no longer required by law to retain. We have physical, electronic and procedural safeguards to protect your information which is held by us. Your information, both hard-copy and/or electronic records, are held at our secure office premises and at secure offsite premises using trusted third parties. Our office premises are protected against unauthorised access by electronic security passes which are held only by our staff, alarms and cameras. Access to information stored, including electronic records which require login and password authorisation, is restricted to our staff whose job purpose requires access. All our staff undertake information security and privacy training. We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems.

8. Customer rights

Wherever it is lawful and practicable, we will give you the option of not providing information when entering into transactions with us. However, in most cases, if you do not provide the full and complete information requested we will be unable to proceed with your application for credit or assist you with your query or request for information. Credit providers, like us, may ask credit reporting bodies to use their credit-related personal information to prescreen you for direct marketing. You can ask any credit reporting body not to do this. Also, if you have been, or have reason to believe that you are likely to become, a victim of fraud (including identity theft), you can ask the credit reporting body not to use or disclose the credit-related information it holds about you.

9. Accessing, correcting and updating your information

Accessing

You may ask us what personal information we hold about you, and you may make a request to access to this information at any time. You may make a request by contacting us. We will process your request within a reasonable time and try to make this information available within 30 days of your request. Before we give you the requested information we will need to confirm your identity. There is no fee for making the request, but there may be an access charge to cover the time we spend locating, compiling and explaining the information you have requested. If there is an access charge, we will give you an estimate first and ask you to confirm that you would like us to proceed, if you would like us to we do require payment up front (you may authorise to direct debit your account). Generally, the access charge is based on an hourly rate plus any other reasonable costs incurred by us such photocopying and postage. We do not need to provide access to your information in several circumstances; for example, the information is commercially sensitive, the request is frivolous or would unreasonably interfere with another person's privacy or be in breach of the law, or, where to provide access would pose a threat to health or public safety. If we refuse you access, we will advise you of our reasons for doing so.

Correcting

You may ask us at any time to correct the information we hold about you or that we have provided to others (including credit-related personal information) contacting us. If your request relates to credit-related personal information disclosed to us by others, we may need to consult with credit reporting bodies or other credit providers. We will process your request within a reasonable time and try to correct the information within 30

days. If it looks like it will take longer, we will let you know the reason for the delay and try to agree to an extended timeframe with you. If we are able to correct your information because it is indeed inaccurate we will inform you when it is so corrected. If we disagree with you that the information is inaccurate and should be corrected, we will inform you in writing of our reasons. You may request that we attach a statement to that relevant information noting that you consider it is inaccurate misleading, incomplete, irrelevant or out-of-date. We will take reasonable steps to comply with such a request.

Updating

It is important that we have your correct information and details particularly your current address and telephone number. It is also usually a requirement under the terms and conditions of your finance contract that you keep us informed of any changes to your information and details. You can check or update your information by contacting us.

10. Complaints resolution

We are committed to providing the highest quality of service and products to our customers. However, we are not perfect and if you feel that we have not met your expectations we would like to hear from you so we can quickly remedy the problem. If you have a concern about your privacy including credit-related, you have the right to make a complaint to us and we will do all that we can to promptly remedy the problem or address your concerns.

How to make a complaint

You may lodge a complaint by contacting us. We will acknowledge your complaint and do our utmost to review your concerns and resolve any issues or remedy any problems as promptly as possible.

How we handle your complaint

If we cannot resolve any issues or remedy any problems within 5 business days, we will write to you and provide you with the name and contact details of the complaints handling officer who is investigating and dealing with your complaint. We will keep you updated on the progress of your matter every two weeks if necessary and will provide you with a final written response within 45 days. We are generally able to resolve complaints within a few days; however, we are unable to provide you with a response within 45 days, we will let you know the reason for the delay and try to agree to an extended timeframe with you.

Credit-related personal information complaints

If your request relates to your credit-related personal information and our actions in relation to it, we may need to consult with credit reporting bodies or other credit providers. We will acknowledge your complaint within 5 business days and if it looks like that we will not be able to resolve your complaint within 30 days we will let you know the reason for the delay and try to agree to an extended timeframe with you.

External review

If we do not resolve your complaint to your satisfaction or we are unable to resolve a complaint you have the right to refer the matter to our External Dispute Resolution Scheme (EDR), the Australian Financial Complaints Authority (AFCA). This is a free service. We recommend you only do this after you have first been through our internal dispute resolution (IDR) procedure described above. AFAC is acting as an EDR scheme recognised by the Office of the Australian Information Commissioner (OAIC) to deal with privacy related complaints. AFAC may be contacted by calling 1800 931 678, online at www.afca.org.au/ or writing to GPO Box 3 Melbourne, VIC, 3001 . Please note that unless certain circumstances exist, AFAC will only deal with your complaint if you have first been through our IDR procedure. If your complaint is about the way we handle your personal information, you may also contact the OAIC by calling them at 1300 363 992, online at www.oaic.gov.au or writing to GPO Box 5218 Sydney NSW 2001