

Privacy and Credit Reporting Policy

The protection of your personal information is very important to us. This Privacy and Credit Reporting Policy explains how we collect, hold, use and disclose your personal information when you visit our websites, mobile apps, official media platforms or apply for or use our services or products through us or our authorised third parties. It also outlines how we manage your credit information and credit eligibility information in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**), the Australian Privacy Principles (**APP**), and the *Privacy (Credit Reporting) Code 2014 (Code)*.

The APP is designed to protect personal information about individuals and sets in place a framework and guidelines about how to deal with this information. APP 1.3 requires us to have a clearly expressed and up-to-date APP privacy policy describing how we manage your personal information. Further in February 2018, the Notifiable Data Breaches (**NDB**) Scheme was introduced under Part IIIC of the Privacy Act. The NDB establishes requirements and compliance mechanisms for entities in responding to data breaches. This Privacy and Creditor Reporting Policy is to be read in conjunction with our Terms and Conditions and our Privacy Consent which is available [here](#).

For the purposes of this Privacy and Credit Reporting Policy, 'we' 'us' and 'our' means Moneytech Group Limited ACN 611 393 554 and our Related Bodies Corporate.

By providing us with your personal information you consent to us using and handling your information in accordance with this Privacy and Credit Reporting Policy. If you provide any personal information about another individual, then we rely upon you to inform that person of our policy and make them aware of the details contained herein.

What information do we collect and hold?

"Personal information" as defined under the Privacy Act, means information or an opinion about an identified individual, or an individual who is reasonable identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

The kinds of personal information we collect and hold about you depends on the circumstances of collection and the nature of your dealings with us.

We generally collect and hold the following kinds of personal information (and where that information is credit information, the following kinds of credit information) about our customers and applicants:

- your identification information, including name, date of birth, address, telephone number, email address or other contact details, driver licence particulars, occupation and other information requested and/or provided by you and people nominated by you when you made your application for our products or services;
- information we may require to identify you, including as required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (*AML/CTF Act*), which may include details or copies of your driver licence or passport;
- personal information about you to record a security interest on the Personal Property Securities Register pursuant to the Personal Property Securities Act;
- details of products or services that we provide or have been requested to provide to you, including information about the ongoing management and activity of the products or services we have provided;
- information relevant to the provision of products or services to you, including information about your financial position, such as

details of assets and liabilities, details of income and proof of financial position;

other information relevant to our relationship with you, including name and contact details of your professional advisers or representatives such as your solicitor or accountant; your referees or guarantors; and information contained in identity documents that you may provide to us (such as the names of your family members);

- records of our interactions with you, including by telephone, email and online;
- publicly available information; and
- your enquiries or complaints.

We may also:

- collect and hold the following kinds of personal information about contractors, service providers and suppliers: name, job title, business contact details of company representatives with whom we deal, financial information and banking details; and
- in the context of our recruitment process for employees and contractors, collect and hold the following kinds of personal information: name, email address, telephone number, address, financial details (including banking details), date of birth, history with us (including communications between us), citizenship, employment references, civil, credit and criminal records, driver licence information, education, employment history, marital status, membership of a professional or trade association, membership of a trade union and health information.

If we are not provided with this personal information, then we are unable to provide you with our products or services.

We will not collect sensitive information about you unless you provide your consent, or we are authorized to do so by law.

Credit information we collect and hold

As a Credit Provider (CP), the kinds of credit information we may also collect and hold includes:

- details of your loans, including your mortgage and any other personal loan details such as when the account was opened or closed, the amount and type of account;
- your credit card balances and limits;
- information about your repayments and whether they were made on time;
- internally through our own records such as whether you have defaulted on a loan;
- credit score information about your credit worthiness and eligibility for credit;
- default information including when the default has been paid;
- information about your application for credit with us including the type and amount;
- any new arrangements with us because of a default;
- any serious credit infringements; and
- any other types of credit information included in credit reports we obtain from credit reporting bodies.

Credit eligibility information we hold

The kinds of credit eligibility information that we usually hold includes:

- credit reporting information we obtain from credit reporting bodies including your credit score; and
- any CP derived information about you which we derive from credit reports we obtain about you.

CP derived information we derive

The kinds of CP derived information that we usually derive from credit reporting information disclosed to us by the Credit Reporting Body (CRB) includes the following:

- name
- address
- email
- phone number
- credit related information

Electronic Identification Verification

Under the AML/CTF Act, we may be required to disclose your name, drivers licence number, government identification number, telephone number, residential address, and date of birth to a third party including an online verification and AML service provider and a CRB in order to verify your identity electronically. If you are an individual, we will obtain your consent before we disclose this information to any third party including a CRB.

The third-party online verification providers that we may disclose your information to include:

- greenID
Website: gbg-greenid.com
- Simple KYC

Website: simplekyc.com

If you do not consent to have your identity verified electronically, you will be required to provide us with certified copies of your identification documents to us.

If we are unable to verify your identity, we will be unable to provide our services to you.

How we collect personal information and credit information

We collect personal information (including credit information) directly from you, such as through meetings with you in person, or via other contact methods such as by telephone, facsimile, e-mail and mail, or when you complete an application form, transact with us or provide further information through our website.

We may also collect personal information (including credit information) about you from other sources, such as:

- credit reporting bodies, including from credit reports in the course of assessing your credit application;
- other financial institutions that we have collaborated with to provide you with a product or service;
- any credit provider named in your application, or a credit report obtained from a CRB;
- any sources disclosed in your application, such as referees, past and present employers, past and present landlords, next of kin, and persons acting on your behalf, such as brokers, solicitors and accountants;
- any guarantor or proposed guarantor of your application for credit;
- organisations that assist us in our business, such as our lenders' mortgage insurer, registered trade insurer, valuers, surveyors, auctioneers, real estate agents and debt collectors;
- publicly available sources, including public registers and social media, and personal insolvency information about you entered or recorded in the National Personal Insolvency Index;
- government authorities; and
- our Related Bodies Corporate.

We may collect, hold and disclose personal information about an individual from third parties who have applied for a product or service, for example:

- where a company is an applicant and details of the company's officeholders or account signatories are provided to us by the individual(s) applying on behalf of the company;
- where a trustee is an applicant and details of the trustees and beneficiaries are provided to us by the individual(s) applying on behalf of the trust; or
- where an applicant provides the details of their professional advisers.

You acknowledge that when you provide personal information about another person, you are authorised to do so and agree to inform that

person of the contents of this Privacy and Credit Reporting Policy as it relates to them.

What are the purposes for which we collect, hold, use and disclose your personal information, credit information and credit eligibility information?

The Privacy Act allows us to disclose personal information about you when related to the primary purpose for which it is collected.

We collect, hold, use and disclose your personal information (and where that information is credit information and/or credit information, your credit information and/or credit eligibility information) for the purposes of:

- assessing and processing any application you make for our products or services and any related insurance proposal;
- for cyber security and network security purposes;
- if you are a guarantor or prospective guarantor, assessing whether to accept you as a guarantor for products applied for by another applicant;
- providing you the products and services we offer in the course of our business;
- administering and managing all products or services we provide to you;
- providing information to other financial institutions that we have collaborated with to provide you with a product or service;
- performing other administrative tasks including, collecting of loans, staff training, credit scoring and risk assessment, undertaking planning, research and statistical analysis, systems development and testing;
- answering an enquiry you make or responding to a complaint made by you in respect of a product or service;
- conducting data analytics to help us improve our products and services;
- verifying your identity and complying with our legal and regulatory obligations including to comply with the AML/ CTF Act;
- facilitating our internal business operations, including audits, securitisation, record-keeping, file reviews and portfolio analysis;
- analysing products and customer needs to develop new products;
- informing you of products and services provided by us, our Related Bodies Corporate or our Preferred Providers which we consider may be of value or interest to you, unless you tell us or have previously told us not to;
- managing overdue payments and recovering overdue amounts you owe us where you have failed to meet your payment obligations to us;
- assisting you to avoid defaulting on your loan;
- deriving credit eligibility information;
- providing credit reporting bodies with information about you;
- providing credit references to another credit provider when you apply for credit;
- conducting our credit assessment process and analysing your credit worthiness for a loan;
- undertaking fraud prevention measures;

- contracting out some of our functions to external service providers and suppliers (such as mailing houses and printing companies, IT, advertising and marketing);
- assessing and considering applications from prospective job applicants, contractors and service providers; and
- as otherwise stated in this Privacy and Credit Reporting Policy.

When using your personal information for cyber security and network security purposes, this may include identifying and prohibiting malicious content and identifying cybercrime.

In order to fulfil these purposes, we may use your personal information to determine whether you are likely to be affected by any malicious activity and we may take any appropriate action to block any malicious activity or contact you so that you are aware of any suspicious activity.

We may also disclose your credit information to a credit reporting body in the following circumstances:

- to assist us in assessing your credit worthiness when considering your application for credit;
- to allow the relevant credit reporting body to create and/or maintain accurate records in relation to you;
- to recover overdue amounts you owe us where you have failed to meet your payment obligations to us; and
- where you have committed a 'serious credit infringement', or to report defaults (in accordance with the Privacy Act).

The information we might collect about you and disclose to one or more CRB may include:

- identification information;
- personal information relating to commercial credit;
- default information;
- personal insolvency information;
- serious credit infringements;
- court proceedings (other than criminal proceedings) that relate to any credit that has been provided to, or applied for by, the individual;
- payment information.

Finally, we may disclose credit information we hold about you when required or permitted by law.

Privacy Consent

We may also collect, hold and disclose your personal information provided to us upon your consent, to our Preferred Providers and in accordance with the terms of our Privacy Consent which can be accessed [here](#).

Data Breaches

In accordance with the Notifiable Data Breach Scheme (**NDB**), we are aware of our responsibilities to notify you in the event of a potential data breach that may cause serious harm to you.

While we will take all reasonable endeavours to secure your data, there is the possibility of unauthorised access to, unauthorised disclosure of, or loss or modification of your personal information (including credit information) that we hold (**data breach**).

Under the NDB where we have reasonable grounds to believe that there has been a data breach, and that it is likely to cause serious harm to one or more individuals, we will:

- notify all individuals whose personal information was part of the eligible data breach; or
- notify only individuals at risk of serious harm from the eligible data breach; or
- if the above isn't practicable, publish a copy of the statement on our website and take reasonable steps to publicise the contents of the statement.

Where we suspect a data breach has occurred, we will immediately conduct an investigation and if one is found will follow the above procedure.

For more information on the NBD scheme, please see <https://www.oaic.gov.au/privacy/notifiable-data-breaches>.

Overseas disclosures – Personal Information

From the 25th May 2018, the General Data Protection Regulation (**GDPR**) was introduced providing increased transparency for data protection for all businesses transferring data to the EU. While the GDPR and the Privacy Act share some similarities, we are providing robust privacy policies and procedures for our staff and clients.

Our business is operated only in Australia. However, in some cases your personal information may be disclosed to organisations overseas including without limitation the United States of America. If you are located in the Europe Union, we acknowledge that any potential data breaches will be safeguarded by the provisions of GDPR.

Overseas organisations may be required to disclose information shared with them under a foreign law. Your Information may be stored in cloud or other types of network or electronic storage and we will take reasonable steps to ensure appropriate security arrangements are in place if this is the case. Such storage may be accessed from various countries by an internet connection hence it is not always possible to know in which country your Information may be accessed or held.

By using our websites, mobile apps, official media platforms or use of our services or products through us, our authorised third parties or Preferred Providers, you consent to your Information being transferred to other countries which have different data protection laws than Australia.

By consenting to your personal information being disclosed to overseas recipients, subclause 8.1 of the Australian Privacy Principles will not apply to the disclosure.

Overseas disclosure – Credit information/ credit eligibility information

We will not disclose your credit information or credit eligibility information to entities that do not have an Australian link.

Access and Correction of your information

Subject to any applicable exceptions in the Privacy Act or the Code, where we hold personal information and credit eligibility information about you, you have a right to have access to it. Within a reasonable period after receiving a request from you, we will take reasonable steps to provide you with access.

An administrative fee may be payable for the provision of personal information, but such fee will not be excessive and will not apply to making the request.

Any fees for access to credit eligibility information will not be excessive and will not attach to making the request itself. We will advise you of the administrative fee payable by you prior to providing this information. To obtain access to your information, please write to:

**The Privacy Officer:
Suite 2, Level 17
323 Castlereagh Street
Haymarket NSW 2000**

or email us at privacy.officer@moneytech.com.au.

We are required to verify your identity before the credit eligibility information we hold is disclosed to you. We may refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act 1988 (Cth). If we do, we will write to you to let you know why your request has been denied or limited unless, having regards to the grounds for refusal, it would be unreasonable for us to do so.

Unless unusual circumstances apply, we will provide access within 30 days of the request.

If you believe that any personal, credit and/or credit eligibility information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at privacy.officer@moneytech.com.au. We will not charge you for making the request or for correcting the information.

If we are satisfied that the personal, credit and/or credit eligibility information about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take such steps (if any) as are reasonable in the circumstances to correct the information within 30 days from which the request is made or any such longer period you

agree to in writing. If we consider it necessary in order to deal with your request we may consult with a CRB or another credit provider. If we do not agree with a request to correct information we will give you notice in writing as to our reasons and what you can do if you are not satisfied with our response.

Direct Marketing

We may use and disclose your personal information to inform you about products or services we think might be of interest to you. We may also disclose your personal information to our Related Bodies Corporate and Preferred Providers (together referred to as the "**Related Companies**") so that they may inform you about products and services. If you do not want to receive any information about products and services (supplied by us or the Related Companies) please notify us by emailing our Privacy Officer at privacy.officer@moneytech.com.au.

We will not sell, distribute or lease your Information to third parties unless we have your permission or are required by law to do so.

Complaints

If you believe that we have not complied with our obligations under the Australian Privacy Principles (**APP Complaint**) or under the credit reporting provisions of the Privacy Act or the Code (**Credit Related Complaint**) you should firstly let us know by emailing us at privacy.officer@moneytech.com.au setting out details of the breach.

If you make a Credit Related Complaint, within 7 days after the complaint is made we will:

- (a) provide you with a written notice acknowledging your complaint;
- (b) we will set out in that notice how we deal with the complaint; and
- (c) we will investigate the complaint.

Where, in relation to a Credit Related Complaint, we consider that it is necessary to speak to a CRB or a credit provider about your complaint, we will do so.

We will, after investigating your complaint and within 30 days of your complaint (or such longer period as agreed between us in writing), make a decision about the complaint and respond to you in writing.

You may contact the Office of the Australian Information Commissioner (**OAIC**) in relation to both APP Complaints and Credit Related Complaints.

The contact details for the OAIC are:

The Office of the Australian Information Commissioner

Mail: GPO Box 2999, Canberra, ACT, 2601

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

Storage and Security

Your personal and credit information (and credit eligibility information) may be held in physical or electronic form on our systems or the systems of our service providers. We are committed to ensuring that this information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

No Information transmitted over the Internet can be guaranteed to be secure. We cannot guarantee the security of any information that you transmit to us or receive from us. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that information that we collect will not be disclosed in a manner that is inconsistent with this Privacy and Credit Reporting Policy.

Please notify us immediately if there is any unauthorised use of your account by any other Internet user or any other breach of security. For the purposes of viewing the Web site you may have a user name and password. You are responsible for the security and confidentiality of your password and log-in information.

Cookies & Web Beacons

Where you visit our website, use our services or products for which we provide online, we may use cookies from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. However, once you choose to furnish us with personally identifiable information, this information may be linked to the data stored in the cookie.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any personal identifiable information about you, other than the data you choose to share with us. You can choose to accept or delete cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you order. However, this may prevent you from taking full advantage of our website.

We may use web beacons on our website from time to time. Web beacons (also known as clear gifs) are small pieces of code placed on a web page to monitor the behaviour and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

Links to other websites

Our website may contain links to other websites of interest (**Third Party Websites**) and we may display content or information from other websites within frames on our website (**Third Party Content**). We do not have any control over those Third Party Websites or the

Third Party Content. We are not responsible for or liable for the handling, use, disclosure, protection and/or privacy of any personal information which you provide or which has been collected whilst visiting Third Party Websites, and such websites are not governed by this Privacy and Credit Reporting Policy.

Changes to the Privacy and Credit Reporting Policy

We may revise this Privacy and Credit Reporting Policy from time to time by publishing it on our website and will be effective as from the publishing date. If you have any questions relating to this Privacy and Credit Reporting Policy please contact our Privacy Officer on 1300 858 904 or privacy.officer@moneytech.com.au

Notifiable Matters

The law requires us to advise you or otherwise ensure that you are aware of certain 'notifiable matters'.

The CRB in which we use contain their own credit reporting policies outlining how they deal with your information. Such policies are outlined on their respective website and via the details provided below.

We may provide credit information (including personal information) to the following credit reporting bodies:

Equifax Australia Information Services and Solutions Pty Limited

Mail: GPO Box 964, NORTH SYDNEY NSW 2059
Phone: 138 332 (free call)
Website: <https://www.equifax.com.au/>

A copy of Equifax's credit information management policy may be obtained by contacting them at <https://www.equifax.com.au/contact>.

Illion Australia Pty Limited

Phone: 13 23 33
Website: www.illion.com.au

A copy of Illion's credit reporting policy may be obtained by contacting them at www.illion.com.au

CreditorWatch Pty Limited ACN 144 644 244

Email: privacy@creditorwatch.com.au
Phone: 1800 738 524
Website: <https://creditorwatch.com.au/>

A copy of CreditorWatch's credit reporting policy may be obtained by contracting them at <https://creditorwatch.com.au/>

You should be aware of the following matters:

- The CRB may include the personal information disclosed by you in reports provided to credit providers to assist them to assess your credit worthiness.
- If you fail to meet your payment obligations in relation to consumer credit or you commit a serious credit infringement, we may be entitled to disclose this to the CRB.
- You are entitled to request that a CRB:
 - not use credit reporting information about you for the purpose of pre-screening of direct marketing by a credit provider;
 - not use or disclose credit reporting information about you where you believe on reasonable grounds that you have been or are likely to be a victim of fraud.
- You may obtain a copy of or access our credit information management policy (that is this Privacy and Credit Reporting Policy) by accessing <https://www.moneytech.com.au/privacy-policy/> and can also be obtained by calling 1300 858 904.
- You have the right to request access to the credit information and credit eligibility information that we hold about you and make a request for us to correct the credit information or credit eligibility information if required. Please see above for more information.
- You can complain to us if you consider we have not complied with Division 3, Part IIIA of the Privacy Act or the Code.

Contact details

If you would like more information about our approach to privacy, or if you wish to contact us regarding the information set out in this Privacy and Credit Reporting Policy, please contact us:

By email: privacy.officer@moneytech.com.au

By phone: 1300 858 904

By post: Level 7, 80 Pacific Highway, North Sydney NSW 2060

Definitions

In this Privacy and Credit Reporting Policy, "commercial credit", "CP derived information", "credit eligibility information", "credit information", "credit reporting body", "credit reporting information", "credit worthiness" and "personal information" have the meanings given to them in the Privacy Act.

Credit Provider means us as an organisation that carries on a business providing credit or, where the context requires, another credit provider that carries on a business of providing credit.

Related Bodies Corporate means:

- Moneytech Finance Pty Ltd ACN 112 110 906
- Moneytech Finance 2 Pty Ltd ACN 639 950 584
- Moneytech IP Pty Ltd ACN 659 713 541
- Moneytech Services Pty Ltd ACN 112 110 933
- Moneytech AG Pty Ltd ACN 662 294 037 /ABN 40 662 294 037
- Moneytech Group Limited ABN 24 611 393 554

Sensitive information has the meaning given to it under the Privacy Act and includes:

- (a) information or an opinion about an individual's:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political association; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal record;

that is also personal information; or

- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or

- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or biometric templates.

