

Privacy Policy

We are bound by the Australian Privacy Principles (Principles) contained in the Privacy Act 1988 (Privacy Act). The Principles are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is managed. Personal information is, generally, information or an opinion relating to an individual, which can be used to identify that individual. We may also handle information about companies and other persons in the ways described here.

To find out details specifically relating to our handling of personal information obtained from credit reporting bodies and certain other consumer credit-related personal information, please visit our Credit Reporting Policy page.

1 Summary

- 1.1 We collect personal information about Clients, shareholders, employees and other individuals. We collect personal information through personal contact, records of communications and third parties including public sources - See section 2.
- 1.2 We handle personal information for purposes including to provide, manage and enhance our products and services, understand you and conduct direct marketing - See section 3 including how to opt out of any direct marketing.
- 1.3 This Privacy Policy sets out some additional information for particular individuals and contexts - See section 4 where relevant to you. Our separate Credit Reporting Policy may also be applicable to you as a Client or guarantor in connection with some credit arrangements.
- 1.4 We take various steps to protect the security of personal information and to destroy or de-identify that information when no longer needed. You may be entitled to access and correct your personal information that we hold in certain circumstances - See section 6.
- 1.5 You can contact us with any queries or concerns about privacy – See section 8. In some cases, you may be able to raise your concerns with an external body - See section 7.

2 Collection of personal information

- 2.1 We collect certain personal information in various circumstances, such as when you contact us or engage with us.
- 2.2 The types of personal information that we collect may include information about:
- (a) Clients;
 - (b) shareholder;
 - (c) suppliers;
 - (d) employees;
 - (e) personal contacts at corporate clients or suppliers;
 - (f) applicants for employment with us; and
 - (g) other people who come into contact in the ordinary course of business.
- 2.3 The types of personal information (including historical information) we collect include your name, contact details, identification information, organisation, positions held, information in forms you submit, payment details and enquiry/complaint details. We also collect data and personal information about your interactions and transactions with us, including any contact we have with you by telephone, email or online.
- 2.4 We will check that you have consented prior to collecting, using or disclosing your sensitive information, unless the collection of the information is required or authorised by law. Sensitive information is information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, genetics, biometrics or health.
- 2.5 This information is collected in a variety of ways, including by way of personal contact such as business activities and events, as well as mail, telephone, email and online. Please note that our websites do not provide systems for secure transmission across the internet, except where indicated. We may monitor and record your communications with us (including email and telephone) and operate video and audio surveillance devices in our premises for purposes including security, record-keeping and training. We may also collect and use personal information available from related entities (as that term is defined by the Corporations Act

2001) public sources such as telephone listings, and from other third party sources including where it is necessary to identify Clients.

- 2.6 Where you provide us with personal information about someone else you must have first obtained their consent to provide their personal information to us based on this Privacy Policy.

3 Use and disclosure of personal information

- 3.1 In general, we may use or disclose personal information for the following purposes:
- (a) provide our products and services to Clients;
 - (b) understand you and meet your needs;
 - (c) process payments and refunds;
 - (d) verify your identity and personal information;
 - (e) maintain and update our records and carry out other administrative tasks;
 - (f) communicate and manage our relationship with you and your organisation;
 - (g) help manage and enhance our products and services, including by conducting surveys and other research;
 - (h) deal with your applications, enquiries and concerns;
 - (i) prevent, detect, investigate and deal with unlawful activity and misconduct (whether actual or suspected); and
 - (j) comply with legal obligations and protect our lawful interests.
- 3.2 We may not be able to do these things without your personal information. For example, we may not be able to provide our services, communicate with you or deal with your enquiries.
- 3.3 We may also use and disclose your personal information in connection with acquisitions or potential acquisitions of our business.
- 3.4 We also use your personal information to promote and market products and services to you, including through telephone and electronic methods such as email, SMS, websites and mobile apps. This is to keep you informed of products, services and special offers and may continue after you cease to acquire services from us.
- 3.5 If you do not wish us to contact you to promote and market products, services and special offers (whether it be through electronic methods or otherwise), or if you have subscribed to any of our newsletters or subscriptions and no longer wish to receive such communications, please call us.
- 3.6 We may exchange personal information with:
- (a) service providers and specialist advisers who have been contracted to provide administrative, financial, research, archival, auditing, accounting, customer contact, sales, legal, business consulting, banking, payment, credit management, debt collection, delivery, data processing, data analysis, information broking, research, marketing, investigation, website, technology or other services;
 - (b) any regulatory body with jurisdiction over us in accordance with applicable regulation;
 - (c) insurers, lawyers, courts, tribunals and regulatory authorities (including the Australian Tax Office) as required or authorised by law or in accordance with their reasonable information requests;
 - (d) insurance investigators; or
 - (e) your representatives and anyone else authorised by you, as specified by you.
- 3.7 The third parties described above may be located in or out of Australia.

4 Additional information for particular individuals and contexts

4.1 Clients

- (a) We may exchange your personal information with debt buyers and any relevant loyalty program partners.
- (b) In some cases, Clients are introduced to us by third party introducers such as sales partners and marketing information services. We may collect your personal information from those parties.
- (c) If you apply for or obtain services from us on credit, then our Credit Reporting Policy may be relevant to you.

4.2 Online

- (a) We may operate a range of online services to provide information and services. These may include websites, mobile apps, email and social media profiles (Online Facilities).
- (b) Our Online Facilities may use 'cookies' from time to time. A cookie is a piece of information that allows our system to identify and interact more effectively with your device. The cookie helps us to maintain the continuity of your browsing session and remember your details and preferences when you return. You can configure web browser software to reject cookies however some parts of our websites may not have full functionality in that case.
- (c) In some cases third parties may use cookies and other technologies such as web beacons and JavaScript on our Online Facilities in connection with online services like banner advertising, traffic analytics and surveys. This may allow them to collect information about your use of our Online Facilities (including your computer's IP address) which they may store in the United States or other countries. The use of these technologies allows them to deliver customised advertising content, measure the effectiveness of their advertising, evaluate users use of our Online Facilities and other websites and provide other services relating to website activity and internet usage. Those third parties may also transfer the information they collect to others where required to do so by law, or where those others process the information on their behalf. The services we may use from time to time include Google Analytics, Google AdSense, DoubleClick, Yahoo, Adobe and Microsoft. You can find more details in the privacy policies for those services, including information on how to opt-out of certain conduct.
- (d) If you are considering sending us any other personal information through our Online Facilities or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). We are subject to laws requiring us to protect the security of personal information once it comes into our possession.
- (e) Our Online Facilities may contain links to third party websites or services. We are not responsible for the privacy practices or policies of those sites or services.

4.3 Job applicants

- (a) If you apply for a position with us, we may also collect information about your qualifications, experience, character, screening checks (including health, reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability, drugs/alcohol and criminal record checks). We collect, use and disclose your personal information to assess your application, conduct screening checks and consider and contact you regarding other positions. We may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. Without your personal information we may not be able to progress considering you for positions with us.

4.4 Staff

- (a) This section applies to our current and former employees and contractors in addition to the recruitment section above.
- (b) We may collect information relating to your current or former employment or engagement including information about your training, disciplining, resignation, termination, terms and conditions, emergency contact details, performance, conduct, use of our IT resources, payroll matters, union or professional/trade association membership, recreation, leave and taxation, banking or superannuation affairs. We are required or authorised to

collect your personal information under various laws including the Fair Work Act, Superannuation Guarantee (Administration) Act and Taxation Administration Act.

- (c) We collect, use and disclose your personal information for purposes relating to your employment or engagement with us including engagement, training, disciplining, payroll, superannuation, health and safety, administration, insurance (including WorkCover) and staff management purposes. We may exchange your personal information with your representatives (including unions) and our service providers including providers of payroll, banking, staff benefits, surveillance and training services. Without your personal information we may not be able to effectively manage your employment or engagement.

5 Management of personal information

- 5.1 We realise that your personal information may change frequently with changes of address and personal circumstance. You can help us to ensure that the personal information we hold about you is accurate and up-to-date. Please contact us promptly by a method set out in Section 8 of this Policy to inform us of any changes to your personal information.

- 5.2 We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We implement a range of measures to protect the security of that personal information. We are also required to take reasonable steps to destroy or de-identify personal information when no longer needed for any permitted purpose.

6 Accessing and correcting your personal information

- 6.1 Under the Principles, you may have the right to obtain access to personal information which we hold about you and to advise us of any perceived inaccuracy. We will consider any recommendation by you to change or correct information and advise you of the action taken.

- 6.2 You may also request to access your personal information by contacting us by a method set out in Section 8 of this Policy. Depending upon the personal information you seek, you may be asked:

- (a) to complete an Information Request Form;
- (b) to verify your identity in writing; or
- (c) if the inquiry involves extensive administration time or resources, to pay a fee. If this is the case, we will advise the likely cost in advance and can help refine your request if required.
- (d) Please note that in circumstances prescribed by the Privacy Act, you may be refused access to or correction of your personal information (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals). In these circumstances we are required to provide you our reasons and if you request, make a note of your requested correction with the relevant information.

7 Complaints about an interference with privacy

- 7.1 If you consider that any action taken by us breaches this Privacy Policy or the Principles, you can make a complaint by contacting us by a method set out in Section 8 of this Policy. We will endeavour to act promptly in response to a complaint.

- 7.2 If your privacy concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner and on 1300 363 992.

8 How to Contact us

- 8.1 You can contact us about a privacy-related issue by phone, post or email.

- (a) Phone:
- (b) Post:
- (c) Email:

9 Updates to this policy

- 9.1 Our Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.