

FinChoice Privacy Policy

FinChoice Pty Limited

ABN No. 97 158 645 624

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Privacy Policy

Introduction

We are committed to protecting your privacy. This Privacy Policy describes how we collect, use, store and disclose your personal information in accordance with the Privacy Act 1988 (Cth). By 'we', we mean:

- Our mortgage broking business, Mortgage Choice Limited (ACN 009 161 979);
- Our financial advice business, FinChoice Pty Limited (ACN 158 645 624);
- Their related entities, franchises, subsidiaries, and employees; and
- The mortgage brokers or financial advisers that will assist you, while acting as credit representatives of Mortgage Choice Limited or authorised representatives of FinChoice Pty Limited.

How we collect personal information

When we refer to "personal information", we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you, whether true or not. Where reasonable and practical, we will collect your personal information directly from you.

We collect personal information from you through our Customer Service Centre, through our credit representatives (brokers) and financial advisers, when interviewing you, when you complete a fact find or application for a product, over the phone or in person or by email, from our website or through your online portal with us, and from competitions and promotions to which you choose to respond.

The personal information we collect

The type of personal information we collect may include your name, date of birth, address, account details, occupation and any other information we may need to identify you. This will depend on how we receive your personal information. For example, if you complete a form on our website asking to be contacted, we may collect your name, email and phone number.

If you are applying for a loan or seeking financial planning advice, we may also collect a broad range of information including your marital status, gender, citizenship and racial or ethnic origin, the personal information and racial or ethnic origin of your dependants, the length of time you have lived at your current address, your employment details, proof of income and expenses and other financial details. We may also collect government identifiers such as your Tax File Number for tax purposes, or your drivers' licence or passport number to identify you.

If you are seeking financial advice or applying for insurance, we may also collect sensitive information such as information about your health. We will collect health information from you only with your consent.

The Anti-Money Laundering and Counter-Terrorism Financing Act also requires FinChoice to any identify any 'politically exposed persons' which means we may also collect information about you if you hold a prominent public position in a government body or international organisation e.g. if you are a politician or government official.

You may choose not to provide any of the information requested by us, however this may restrict our ability to assist you with financial planning advice.

We may collect your personal information from our related companies, franchises and subsidiaries. For example, our financial advisers may collect your personal information from our mortgage brokers, where you have provided information to the broker so the adviser can obtain information from the broker instead of asking you to provide it again. As another example, our financial advisers may refer you to our mortgage brokers and provide your personal information to the mortgage brokers so the brokers do not need to ask you to provide it again.

We may also collect personal information from third parties such as:

- Our related companies, franchises and subsidiaries, for example from our mortgage brokers;
- Credit providers, accountants, lawyers, insurers including mortgage insurers, companies you invest with, superannuation providers, brokers and other professional advisers, real estate agents and persons acting on your behalf for example guardians and persons holding power of attorney;
- Organisations who you ask our advisors to arrange investments with or through, including your tax file number;
- Insurance providers where you have given permission for this information to be shared, this can include sensitive information such as health information;
- Another person or entity where you are covered under an insurance policy that covers more than one person or is taken out by someone you know;
- People who refer you to us, which is generally limited to your name and contact information;
- Credit reporting bodies, to verify your identity, or brokers may obtain your information from a credit reporting body when you make credit enquiries or apply for credit;
- Organisations who help us verify your identity for anti-money laundering and counter-terrorism purposes; and
- People who assist us to provide our services, including financial intermediaries from whom we obtain quotations, service providers (including marketing providers, administration and paraplanning services, software providers, data and cloud storage, and IT services), or business partners who work with us to provide you with products or services along with us to you, and people who help us with claims like assessors and investigators.

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The purposes for which we manage your personal information

The main purpose for which we collect your personal information is to provide you with financial advice, for example to consider your financial situation and goals, arrange for our advice to be implemented like arranging insurance or investment or superannuation products, and to give you ongoing services.

Other purposes include to:

1. Provide you with information about products or services, including by email, sms or mail. You may opt out of this at any time by getting in contact with us;
2. Perform internal functions such as administrative, accounting, marketing, information technology system, planning and research requirements;
3. Manage your ongoing requirements or ongoing relationship with you, improve our services, develop our products and conduct research;
4. Comply with legal and regulatory requirements, and prevent fraud or crime, for example to verify your identity for anti-money laundering and counter-terrorism financing purposes;
5. Refer you to other organisations, service providers or business partners; and
6. Use cookies to give you online advertisements based on prior visits to our website. You may opt out of Google's use of cookies by visiting the Google's advertising opt out page (<http://goo.gl/5BL8t>).

Disclosure of your personal information to others

We may disclose your personal information to:

- Our related bodies corporate, franchises and subsidiaries e.g. between our brokers and financial advisors;
- Organisations who you ask our advisors to arrange investments with or through, including your tax file number;
- Credit providers, accountants, lawyers, insurers including mortgage insurers, companies you invest with, superannuation providers, brokers and other professional advisers, real estate agents, and persons acting on your behalf for example guardians and persons holding power of attorney;
- Insurance providers where you have given permission for this information to be shared, this can include sensitive information such as health information;
- Organisations who help us verify your identity for anti-money laundering and counter-terrorism purposes;
- Credit reporting bodies, to verify your identity, or when you make credit enquiries or apply for credit, brokers may disclose this to a credit reporting body;
- People who assist us to provide our services, including financial intermediaries from whom we obtain quotations, service providers (including marketing providers,

administration and paraplanning services, software providers, data and cloud storage, IT services, auditors, our lawyers and accountants), or business partners who work with us to provide you with products or services along with us to you, and people who help us with claims like assessors and investigators;

- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event;
- Regulatory bodies e.g. ASIC, government agencies, law enforcement bodies and dispute resolution bodies e.g. the Australian Financial Complaints Authority; and
- People who refer you to us.

For example, if you provide us with personal information to assist us find you a suitable loan, we may collect personal information about you and disclose it to one of our credit representatives or a member of our lender panel.

We will disclose your personal information only for the purpose/s for which we collected the personal information. Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- The person or organisation has a commitment to protecting your personal information at least equal to our commitment; or, if required
- You have consented to us doing so.

We will disclose your personal information to those third parties only where such disclosure is for the purposes required. We will disclose your personal information when we are required by law to do so. We may use cloud storage to store your personal information that we hold. The parties to which we disclose your personal information may be located in the Philippines, United States, European Union, South Africa and other countries.

Direct Marketing

From time to time, we may use your personal information to provide you with current information about loans, special offers you may find of interest, changes to our organisation, or new products and services being offered by us or any business with which we are associated. We do not sell your personal information for direct marketing purposes.

If you do not wish to receive marketing information, you may, at any time, decline to receive such information by contacting us on the details listed below. If the direct marketing is by email, you may also use the unsubscribe function included in such emails. We will not charge you for giving effect to your request and we will take all reasonable steps to satisfy your request at the earliest possible opportunity.

How our website and app manages your personal information

We may use technology such as cookies and beacons to collect information about the use of our website, mobile app and interaction with our emails and to give you online

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advertisements based on your activity. This includes your server address when you browse our website, the date and time of your visit, the pages and links accessed, the type of browser used, and referring website address. Our mobile app may also log your location. We use this information for statistical purposes e.g. gauging visitor traffic, to improve the content and functionality of our service, and to better understand our users. Our website and app also collect any information you provide to it e.g. if you enter your details into it. We also use various software and IT service providers to analyse how users use our website, app and emails e.g. how clients respond to marketing communications or use our app.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up-to-date. During the course of our relationship with you, we will ask you to inform us if any of your personal information has changed. If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to assist us by informing us if the information we hold about you is inaccurate or incomplete.

Access to and correction of your personal information

You may request access to any of the personal information we hold about you at any time. In such instances, we will provide you with access to that information. To access your personal information that we hold, use the contact details specified below. We will respond to you within seven days of receiving your request. We may need to contact third parties to properly investigate your request. We will provide you with the outcome of our investigation within thirty days.

There may be situations where we are not required to provide you with access to your personal information, for example if the information relates to existing or anticipated legal proceedings or if your request is vexatious. An explanation will be provided to you if we deny you access to the personal information about you that we hold.

If any of the personal information about you that we hold is incorrect, inaccurate or out-of-date, you may request that we correct the information. We will provide an initial response to you within seven days of receiving your request. Where reasonable and after our investigation, we will provide you with details about whether we have corrected the personal information within thirty days.

We may need to consult with third parties as part of our investigation about the accuracy of the personal information about you that we hold. If we refuse to amend personal information, we will provide you with our reasons for not amending the information.

Government Related Identifiers

If we collect government identifiers, such as your Tax File Number, we do not use or disclose this information other than as explained in this Privacy Policy and as required by law. We may use government identifiers, such as your

passport number or drivers licence number, to identify you for anti-money laundering and counter-terrorism financing purposes. However we will never make your customer number a government identifier.

Business without identifying you

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information. For example, if you make general enquiries about interest rates or current promotional offers.

How we store your personal information

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or exposure by:

- Installing security and access requirements for all our IT systems, such as passwords, firewalls and virus scanning software.
- Maintaining document storage and destruction policies.
- Providing your personal information to you only when we are satisfied as to your identity.

We store your personal information in both electronic and paper form, including in the cloud, in our offices and in software systems.

We require all staff to maintain the confidentiality of customer information. Access to personal information is restricted to employees whose job responsibilities require access to the information. If we no longer need to hold your personal information, it is securely destroyed or de-identified.

Contacting us and providing feedback

If you are not satisfied with how we have managed your personal information, you may contact our Privacy Officer below. We will acknowledge your complaint within seven days of receipt. We will provide you with a decision on your complaint within thirty days of receipt.

You can make any requests relating to your personal information held by us or any complaints regarding treatment of your privacy by contacting:

The Privacy Officer

Mortgage Choice
PO Box 457, North Sydney NSW 2059
Phone: 02 8907 0444
Email: customerservice@mortgagechoice.com.au

Changes to this Privacy Policy

We may amend this Policy from time to time to comply with new laws or codes of practice that may be implemented. We may also change this Policy to include any new products or services that we may provide from time to time. This Privacy Policy came into operation on 10 May 2019.