

Privacy Policy

Introduction

The privacy of personal information you provide to us is important. This Privacy Policy governs the collection, use and disclosure of your personal information by Mortgage Choice Limited (ACN 009 161 979), FinChoice Pty Limited (ACN 158 645 624), their related entities, subsidiaries, employees and the credit representative or financial adviser that will assist you (“we”, “us” or “the Group”). This Privacy Policy sets out how we intend to respect your rights to privacy, in accordance with the Australian Privacy Principles (APPs) and Part IIIA of the Privacy Act 1988 (Cth), the Privacy (Credit Reporting) Code 2014 and any other relevant law.

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. The personal information we hold about you may also include credit-related information.

“Credit-related information” means:

- “Credit information”, which includes your identity: the type, terms and maximum amount of credit provided to you, including when that credit was provided and when it was repaid; repayment history information; default information (including overdue payments); payment information; new arrangement information; details of any serious credit infringements; court proceedings information; personal insolvency information and publicly available information; and
- “Credit eligibility information”, which is credit reporting information supplied to us by a credit reporting body, and any information that we derive from it.

We use your credit-related information to assess your eligibility to be provided with any finance. Usually, credit-related information is exchanged between credit and finance providers and credit reporting bodies.

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. If you are applying for a loan or seeking financial planning advice, we may also collect the number and ages 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. If you apply for an insurance product through us, we may also collect your health information. We will collect health information from you only with your consent.

If you are seeking financial planning advice from us, we will make it clear what information we need to obtain from you for the purpose of providing financial planning advice, as well as any personal information that may be provided by you at your option. You may choose to not provide any optional information requested by us, however this may restrict our ability to assist you.

If you give us personal information about another person, you represent that you are authorised to do so and agree that you have obtained consent from that person for us to use and disclose their personal information. They may access any personal information we hold about them.

How we collect personal information

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, from our website and from competitions and promotions to which you choose to respond.

How we use your personal information

We use your personal information to assist us:

- Assess your application for credit, manage that credit application and any future applications for credit;
- Establish your identity;
- Contacting you;
- Managing our risk and to comply with our legal obligations;
- Make recommendations to you in respect of risk insurance products, such as insurance for your life, permanent disability, income replacement and critical illness cover;
- Make recommendations to you in respect of investment products and services, such as managed investment funds and investor directed portfolio services (IDPS);
- Make recommendations to you in respect of superannuation products, including self-managed superannuation funds (SMSF);
- Make recommendations to you in respect of investments in direct equities and stock exchange listed products;
- Communicate information about our products and services to you;
- Meet our internal administrative, marketing, planning and research requirements; and
- Remarket using cookies to serve advertisements based on users’ prior visits to our website. Users may opt out of Google’s use of cookies by visiting the Google advertising opt out page (<http://goo.gl/5BL8t>).

We will take reasonable steps to destroy or de-identify your personal information when your personal information is no longer required for one of the above purposes.

Disclosure of your personal information to others

Where possible, we will inform you, at or before the time of collecting your personal information, of the types of organisations to which we intend to disclose your personal information. We may disclose your personal information:

- to prospective funders or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance, such as third party suppliers, printing and postal services, call centres, lenders, mortgage insurers, trade insurers and credit reporting bodies;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to our agents, contractors, external service providers to outsource certain functions, such as for example: statement production, debt recovery and information technology support;

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- to anybody who represents you, such as finance brokers, lawyers, mortgage brokers, guardians, persons holding power of attorney and accountants;
- to anyone, where you have provided us consent to disclose;
- to other borrowers or guarantors (if more than one);
- to borrowers or prospective borrowers, including in relation to any credit you guarantee or propose to guarantee;
- to our auditors, insurers, re-insurers and health care providers;
- to claims related providers, such as assessors and investigators who help us with claims;
- where we are authorised to do so by law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), government and law enforcement agencies or regulators;
- to investors, agents or advisers, trustees, rating agencies or any entity that has an interest in your finance or our business;
- to other financial institutions, for example to process a claim for mistaken payment;
- to organisations that provide products or services used or marketed by us; or
- to your employer, former employer, referees or identity verification services.

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 and other countries.

Credit-related information

We exchange credit-related information for the purposes of assessing your application for finance and managing that finance. If you propose to be a guarantor, one of our checks may involve obtaining a credit report about you.

This credit-related information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store the credit-related information we hold about you.

When we obtain credit eligibility information about you from a credit reporting body, we may also seek publicly available information and information about any serious credit infringement that you may have committed.

We may disclose your credit-related information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us. Where we do this, we make sure appropriate data handling and security arrangements are in place.

Notifiable matters

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit-related information. You may request to have these notifiable matters (and this policy) provided to you in an alternative form.

We exchange your credit-related information with credit reporting bodies. We use the credit-related information that we exchange with the credit reporting body to confirm your identity, assess your credit worthiness, assess your application for finance or your capacity to be a guarantor and manage your finance.

The information we can exchange includes your identification details, what type of loans you have, how much you have borrowed, whether or not you have met your loan payment obligations and if you have committed a serious credit infringement (such as fraud).

If you fail to meet your payment obligations in relation to any finance that we have arranged or you have committed a serious credit infringement, we may disclose this information to a credit reporting body.

You have the right to request access to the credit-related information that we hold about you and make a request for us to correct that credit-related information if needed. Please see the heading 'Access and correction to your personal and credit-related information', below.

Sometimes your credit information will be used by credit reporting bodies for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your credit information is not used in this way.

You may contact the credit reporting body to advise it that you believe that you may have been a victim of fraud. For a period of 21 days after the credit reporting body receives your notification, the credit reporting body must not use or disclose that credit information. You can contact any of the following credit reporting bodies for more information:

- **Equifax Pty Ltd** – www.equifax.com.au,
- **Illion (Australia) Pty Ltd** – www.illion.com.au, or
- **Experian Australia Credit Services Pty Ltd** – www.experian.com.au.

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.

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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 30 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 30 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 required by law. We will never use a government identifier in order to identify you.

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.

Sensitive information

We will collect sensitive information about you only with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health and may include any information you tell us about any vulnerability you may have.

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.

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 30 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

If you are dissatisfied with the response of our Privacy Officer, you may submit a complaint to the Office of the Australian Information Commissioner, which can be contacted on either www.oaic.gov.au or 1300 363 992.

Further information

You may request further information about the way we manage your personal or credit-related information by contacting us.

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 25 October 2019.