

Finance One Commercial Privacy Policy

This privacy policy gives you information about how we collect, store and manage your personal information that you might give us in the course of applying for credit with Finance One Commercial. Personal information is information that allows us to identify you and may also include credit-related personal information. This policy also tells you how you can contact us and explains how we meet our obligations under the *Privacy Act 1988*, the Credit Reporting Code and the Australian Privacy Principles.

The type of personal information we collect

The personal information we collect from you and hold will vary depending on how we have contact with you.

When you visit our website, we may collect and store information about your visit including:

- the domain name and IP address of the computer from which you accessed the Internet;
- the date and time you accessed the website;
- the internet address of the website from which you linked directly to our website; and
- the pages you accessed while visiting the website.

We may also collect your email address through the use of websites, software and internet tracking devices such as cookies, anonymous identifiers and session variables.

As a result of dealing further with us, including by telephone, whether as a customer, guarantor, contractor, supplier or service provider, we may collect and store personal information from you such as:

- your name and date of birth;
- identification information such as your drivers' licence number of passport details;
- your address, previous addresses and how long you have lived at those addresses;
- your employer, previous employers and how long you have been in such employment;
- your bank account details;
- information contained in credit reports obtained from credit reporting bodies, which includes information about your credit history with other credit providers;
- information about your current facilities with other credit providers;
- your email address;
- your telephone numbers; and
- the details of any references you supply, including the names and addresses of your referees.

If you apply to us for credit, we may collect and store credit information such as:

- financial information, including details about your income (from all sources including government benefits), current employment status and recent history, assets, expenses and debts; and
- information about your credit history, including whether you have applied for or obtained credit from other credit providers, your repayment history, default information and other information obtainable through conducting a credit reporting bureau check.

Pseudonyms

You may have the option to use a name other than your real name (a pseudonym) when making general inquiries with us. You are not required to provide us with your name or any personal information if you do not wish to. However, to go beyond making general inquiries you will not be able to remain anonymous. Before providing you with any specific information or offering credit we are required to identify you. We are not permitted by law to provide you with credit without obtaining proof of your identity.

How we collect your personal information

As far as practicable, we collect your personal information directly from you or from persons acting on your behalf, including when you complete our forms, call or email us or in our ongoing dealings with you. For example, we will collect information internally from your transactions in connection with credit, such as when you make payments to us.

We may collect your personal information from the recording of telephone calls. It is our practice to record telephone calls for quality assurance and staff training purposes. You may request that a call not be recorded when you telephone us. Call recordings are stored securely, with restricted access, and are deleted after 31 days.

We may also collect personal information about you from publicly available sources, and in some cases, from third parties including:

- a credit reporting body;
- someone authorised by you, such as an agent, broker, accountant, solicitor, financial counsellor, introducer or guarantor;
- a referee;
- an employer;
- a government body;
- another financial institution;
- a professional or trade association or trade union;
- an approved gateway service provider of the Document Verification Service (e.g., Vix Verify Pty Ltd); and
- our agents.

We may collect personal information about you from your visit to our website through the use of technologies such as anonymous identifiers, session variables, and cookies, including Google Analytics. A cookie is a small piece of data which is sent from a web server to a web browser on your machine or device when your browser visits our website, to help remember your preferences. The cookies are stored on your machine or device as historical identifiers only and cannot do anything to your machine. The cookies used by Finance One Commercial cannot determine your email address or anything about your computer or device. The use of cookies may help us to identify the pages you access and the prior site you visited. The technology that may collect personal information about you from your visit to our website, is used to collect information about how you interact with our website and allow us to remember you. This information may include your internet protocol address, date and time of visit, pages viewed, and how you navigate our website. We use this information in order to improve and customise your browsing experience and for analytics and metrics about our visitors both on this website and other media. We may share data collected through this method with third parties to provide you with relevant advertising when browsing third-party networks and websites, such as Google. You may be able to set your internet web browser to block or limit cookies. Some features of our website may not work as efficiently or at all if you have done so. You can also find out more about how Google uses data and how you can control information sent to Google at <https://tools.google.com/dlpage/gaoptout>. Information about how you can opt out of Google Analytics can be found at <https://tools.google.com/dlpage/gaoptout>.

How we hold your personal information

To secure your personal information and protect it from unauthorised disclosure we:

- maintain a secure environment for storage of information in both hard copy and electronic form;
- use technology such as encryption and password protection to secure any information kept in electronic form; and
- only permit access to such information to authorised personnel only.

The purposes for which we collect, hold, use and disclose your personal information

We may collect, hold, use and disclose your personal information to:

- assess your credit application and that of any proposed guarantors of your credit;
- provide you with our products or services, or those of related entities and affiliated product and service providers;
- manage your credit contract, which may involve the use of external service providers;
- consider any application for variation of your repayments, whether or not on the grounds of hardship;
- collect any debt or otherwise enforce any rights, whether by court proceedings or otherwise arising under your credit contract;
- participate in the credit reporting system and provide information to a credit reporting body;
- manage complaints and disputes;
- meet our legal requirements, including those under Australian privacy, Anti-Money Laundering and Counter-Terrorism Financing and other laws, regulations or codes that bind us;
- assist other credit providers with the same purposes as permitted by Australian privacy law, such as by disclosing credit information to them with your consent or where you have committed a serious credit infringement;
- communicate with you, by way of direct marketing, information about our products and services. If you do not wish us to do so, you can opt out of such communication by informing us in person, by telephone, by post or by email;
- search and/or register any Personal Property Securities; and
- otherwise communicate with you for the purposes outlined above.

The credit reporting bodies to which we may disclose your credit information are:

Equifax
P.O. Box 964
North Sydney NSW 2059

Website: www.equifax.com.au

Illion Australia
P.O. Box 7405, St. Kilda Road
Melbourne VIC 3004

Website: www.illion.com.au

Notifiable matters

We may disclose personal information about you in respect to your credit-related dealings with us to credit reporting bodies. You should be aware that:

- the credit reporting body may include the information in reports provided to credit providers to assist them to assess your creditworthiness;
- if you fail to meet your repayment obligations in relation to consumer credit or commit a serious credit infringement, the credit provider may be entitled to disclose this to the credit reporting body;
- you may obtain our policy about the management of credit-related personal information required by section 21B of the *Privacy Act 1988* (our Credit Reporting Policy) from our website or by contacting us. This policy contains information about how you may access credit eligibility information held by us about you; how you may complain about a failure by us to comply with Division III of Part IIIA of the *Privacy Act 1988* or the *Privacy (Credit Reporting) Code 2014*; and how we will deal with such a complaint;
- you may obtain a credit reporting body's policy about the management of credit-related personal information required by section 20B of the *Privacy Act 1988* by contacting them;
- you have the right to request credit reporting bodies not to use your credit reporting information for the purposes of pre-screening or direct marketing by a credit provider; and
- you have the right to request credit reporting bodies not to use or disclose credit reporting information about you if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

We may disclose your personal information, including credit information, to other parties as part of a process of merger, acquisition, sale of our business or our other assets and, before doing so, will give you notice and an opportunity to opt out of the provision of such information in that instance. In providing you with our products and services, we may also share your personal information with our related entities.

If, for any of the above purposes, we disclose your personal information to any supplier of services to our business or to any prospective purchaser of our business, which we shall do so only if it is necessary for the purposes listed above, we shall:

- do so in accordance with Australian privacy law; and
- seek assurances from those suppliers that they comply with Australian privacy law.

Whether we supply your personal information, credit information, or credit eligibility information to overseas recipients

Finance One Commercial may also store your personal information, (including credit information) in cloud or other types of networked or electronic systems. If your information is stored this way, disclosures may occur with entities located outside of Australia, including data hosting and other IT service providers located in the United States of America and Germany. Finance One Commercial may send your personal information (including credit information) to The Philippines, where we have outsourced a functions or activity to a service provider in that country.

How you may access your personal information held by us

You may request access to your personal information held by us by identifying yourself by telephone, by post or by attaching scanned documents to an email and sending your request for access to us at:

Telephone: 1800 346 663

Email: privacy@financeonecommercial.com.au

Postal Address: PO Box 3041, Hermit Park QLD 4812

If we are unable to grant you access to your personal information, we will give you our reasons in writing within a reasonable time. These may include where providing the information to you may:

- reveal personal information about another person;
- pose a threat to the health or safety of another person;
- not be permitted by law; or
- reveal internal information of a commercially sensitive nature which is not required to be disclosed to you by Australian privacy law.

How you may correct any personal information we hold about you which is incorrect

If you believe any personal information which we hold about you is incorrect, please contact us by telephone, by post or by email, identify yourself, including by electronic identification verification systems used by us, and tell us what information which we hold about you is, in your belief, incorrect and how you want it changed.

If we cannot agree to the change to the information which you have requested, we will give you reasons in writing.

How you may complain about how we deal with your personal information

If you are not satisfied with the reasons referred to above or otherwise have any complaint about how we collect, hold, use or disclose your personal information, please contact our Privacy Officer who will then follow our Privacy Internal Dispute Resolution process. Our Privacy Officer can be contacted on 1800 346 663 or email: privacy@financeonecommercial.com.au.

If you are not satisfied with our Privacy Internal Dispute Resolution process, you may refer your complaint to the Office of the Australian Information Commissioner:

Online: www.oaic.gov.au

Email: enquiries@oaic.gov.au

Phone: [1300 363 992](tel:1300363992) (free call)

Mail: Office of the Australian Privacy Commissioner, GPO Box 5218, Sydney NSW 2001

Changes to this Policy

From time to time, we may make changes to this Privacy Policy because of changes to the law, technology, or our systems. We will provide notice of such changes on our website. Where the changes may affect you in a particular way, and you have a credit contract with us, we will notify you if required by Australian privacy law. You may request a hard copy of this Privacy Policy by contacting us.