

We understand the importance of protecting your privacy and we are committed to complying with the *Privacy Act 1988 (Cth)* ("the Privacy Act"), the Australian Privacy Principles set out in the Privacy Act, applicable Codes of Practice to which we subscribe and other laws and codes affecting your personal information. A copy of our Privacy Policy is available on our website or on request.

## **How we collect your personal information**

We will only collect your personal information (including credit information) directly from you, unless you have provided your consent. We generally collect your personal information from your application for one of our products or services, and from supporting documentation.

We may also need to collect personal information (including credit-related information) about you from third parties. For example, when assessing an application for credit from you, we may collect personal information from your employer, other credit providers and third party service providers including credit reporting bodies.

## **Why we collect your personal information**

We may use your personal information (including credit-related information) for the purpose of providing products and services to you and managing our business relationship with you. This may include:

- assessing and processing your application for our products and services;
- executing your instructions;
- ongoing servicing of our relationship with you;
- uses required or authorised by law;
- protecting you and us from error or fraud;
- research and development;
- collecting overdue payments due under our credit products;
- managing our rights and obligations regarding external payment systems; or
- direct marketing.

We will not use or disclose your personal information (including credit-related information) for a purpose other than one:

- set out in our Privacy Policy;
- you would reasonably expect;
- required or permitted by law; or
- otherwise disclosed to you to which you have consented.

If you do not provide us with the personal information that we request, we may not be able to consider your application for credit or provide other products and services.

## **Laws under which we are required to collect your personal information**

The *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No 1) (Cth)* requires that we collect certain information from you prior to admitting you as a customer. For example, if you are opening a membership as an individual, we are required to collect your full name, date of birth and current residential address. We are also required to verify this information using a reliable and independent source. Different information is required to be collected and verified if you are opening a membership in a capacity other than an individual (eg a company).

The *National Consumer Credit Protection Act 2009 (Cth)* requires that we collect personal information from you when you are applying for credit from us. We are required to collect the information about your credit requirements, objectives and financial situation. We are also required to collect the necessary information to verify your financial situation, which includes verifying your income and employment details.

## **When we may give personal information to other organisations**

We may disclose your personal information (including credit-related information) to other organisations that provide services that assist us in supplying or administering the products and services we offer. Organisations to which we will usually disclose your personal information include:

- our related companies;
- external organisations that are our assignees, agents or contractors;
- external service providers to us, such as:
  - those we use to verify your identity;
  - those we use to provide you with our product and services, including those for who we act as an agent for;
  - administration service platforms;
  - fund managers;
  - payment systems operators;
  - information technology service providers;
  - printing and mailing houses;
  - fraud prevention service providers; and
  - research consultants;
- our professional advisors, such as accountants, lawyers and auditors; and
- your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you.

## **Details of other organisations to which we may disclose your personal information are provided in our Privacy Policy.**

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and privacy obligations with respect to the protection of your personal information.

We may disclose your personal information overseas, where you choose to make an international transfer. The countries we may disclose your personal information to are those to which you make a transfer. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in our Privacy Policy.

From time to time we may use service providers or other third parties who operate or hold data outside of Australia, which may result in your personal information being stored overseas. These parties are selected specifically to assist in enabling us to provide products or services to you, in particular information technology solutions. At present our arrangements include providers based in the United States of America. Where this occurs, we ensure that appropriate data handling and security arrangements are in place to protect your data.

## **Disclosure outside of Australia**

We may disclose your personal information overseas if you choose to make an international transfer. The countries we may disclose your personal information to are those to which you make a transfer. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in our Privacy Policy.

From time to time we may use service providers or other third parties which operate or hold data outside of Australia. This may result in your personal information being stored overseas. These parties are selected specifically to assist in enabling us to provide products or services to you, in particular information technology solutions. At present our arrangements include providers based in the United States of America and the Netherlands. Where this occurs, we ensure that appropriate data handling and security arrangements are in place to protect your data.

## **Marketing**

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We are permitted to do this while you are our customer, and even if you are on the Do Not Call Register.

We may also provide your details to third party organisations whose products or services we distribute for specific marketing purposes.

We will consider that you consent to this, unless you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, such as email. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by contacting us on 13 25 85 or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

## **Your rights to access, or seek a correction of, your personal information held by us**

Our Privacy Policy detail how you may access, or seek a correction of, any personal information that we hold about you.

## **How to notify us about a potential breach of the Australian Privacy Principles**

Our Privacy Policy details how you may complain about a possible breach of the Australian Privacy Principles or the Privacy (Credit Reporting) Code in relation to the personal information that we hold about you, and how we deal with your complaint.