

Privacy Policy

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Document Purpose

This privacy policy explains how we manage your personal information.

Aquamore Finance Pty Ltd ACN 616 745 772 (Aquamore Finance) is committed to managing personal information in accordance with the Privacy Act 1988 (Cth) and Aquamore Finance Privacy Policy. Aquamore Finance recognises that failure to comply with privacy laws or to prevent or manage this risk would not only constitute a breach of legal and/or regulatory requirements, but would also represent a failure to abide by broader community expectations and could carry significant reputational damage, legal and regulatory action and financial loss.

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PRIVACY POLICY

Aquamore Finance are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information. If you would like more information about how we protect your privacy, please contact us. This policy is a component of, and supports, our Data Breach Policy.

WHAT IS PERSONAL INFORMATION

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

When you apply for our products or services we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. If you apply for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

PURPOSES WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

The main reason we collect, use, hold and disclose personal information is to provide you with products and services.

This includes:

- checking whether you are eligible for the product or service;
- assisting you where online applications are not completed;
- providing the product or service; and
- helping manage the product or service.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about products or services we think may interest you.

HOW WE COLLECT PERSONAL INFORMATION

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product or service or talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or whenever you apply for or access Aquamore Finance's products and services.

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- other Aquamore Group companies;
- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you;
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers and health care providers.

WHAT LAWS REQUIRE OR AUTHORISE US TO COLLECT PERSONAL INFORMATION?

We are required or authorised to collect:

- certain identification information about you by the
 - Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
- your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth);

- if you have applied for credit or provide a guarantee, certain information about your financial position under the National Consumer Credit Protection Act 2009 (Cth), and if you give us a mortgage security, certain identification information under property laws in some states and territories; and
- certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth).

HOW WE HOLD PERSONAL INFORMATION

Much of the information we hold about you will be stored in Australia and owned by Aquamore Finance or external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

We may share your personal information with other companies within Aquamore Finance. We may also provide personal information about our customers to organisations outside Aquamore Finance. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- authorised representatives and credit representatives who sell products and services on our behalf;
- insurers, re-insurers and health care providers;
- payment systems operators (for example, merchants receiving card payments);
- other organisations, who jointly with us, provide products or services to you;
- other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, funds managers and portfolio service providers;
- debt collectors;
- our financial advisers, legal advisers or auditors;
- your representatives (including your legal adviser, accountant, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

- organisations involved in the funding (or potential funding) of the Lender's loans (including securitisation trustees, investors and their advisers);
- the Lender's assignees or potential assignees.

We may also disclose your personal information to others outside Aquamore Finance where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS?

We may disclose your personal information to a recipient which is located outside Australia.

This includes:

- for international transactions, such as currency exchanges, we may need to disclose your information to the corresponding international party in order to process the transaction. The countries we disclose your information to will depend on the details of the transaction you ask us to carry out.

DO WE DISCLOSE PERSONAL INFORMATION FOR MARKETING?

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by a member of Aquamore Finance or one of its preferred suppliers. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising.

We may also disclose your personal information to companies outside Aquamore Finance who assist us to market our products and services to you.

If you don't want to receive marketing offers from us please contact us.

DO WE COLLECT PERSONAL INFORMATION ELECTRONICALLY?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question about your account. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access to or to correct your personal information, we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

NOTIFIABLE DATA BREACH

Aquamore is obligated to notify individuals and the Australian Privacy Commissioner where there has been an eligible data breach causing or likely to cause serious harm to an individual or individuals. Please refer to our Data Breach Policy.

Whilst our overriding principle will be to endeavor to take all steps, we can to protect any parties impacted by a Data Breach. Aquamore will:

- Ensure timely escalation of events that could result in a Data Breach with the Managing Director of Aquamore and AML/CTF Manager.
- Move rapidly to quantify the extent of any Data Breach and identify and remediate the situation which gave rise to it;
- Take all necessary steps designed to ensure there are no other similar incidences of data compromise across the enterprise;
- Communicate the Data Breach to all impacted parties as quickly as practicable with openness and in as much detail as we can provide, including notification to third parties as required by law and/or contractual requirements;
- Take steps necessary to protect the parties impacted, including the provision of products and services as appropriate.

RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS – YOUR RIGHTS

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au www.oaic.gov.au

CONTACT US

You can contact us by

calling (02) 9258 8888

writing to us at Governor Phillip Tower, Suite 40.01, Level 40, 1 Farrer Place NSW 2000

CHANGES TO THE PRIVACY POLICY

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up-to-date version is available on

www.aquamore.com.au.

Credit Reporting Policy

ABOUT THIS POLICY

This policy sets out how we collect, use, disclose and otherwise manage your credit information. We may provide more details on how we manage your credit information when we collect your credit information. Our handling of credit information is regulated by the Privacy Act 1988 (Cth) ('Privacy Act') and the Privacy (Credit Reporting) Code ('CR Code').

WHAT IS CREDIT INFORMATION

Credit information is personal information that has a bearing on credit that has been provided to you or that you have applied for. This includes credit for personal, domestic or household purposes and credit in connection with a business. It can also cover information about you as a guarantor of a loan or as an insured party under a credit related insurance policy.

WHAT KINDS OF CREDIT INFORMATION DO WE COLLECT AND HOLD, AND HOW DO WE COLLECT IT?

If you apply for credit or give a guarantee, we may ask for identification information. This could include your name, address and date of birth. We may also collect information about your financial position for the purpose of assessing an application for credit and to assist in the ongoing management of the credit product or guarantee. This could include:

- your employment, income, expenses and savings;
- your past experiences with us and other lenders - such as the kinds of credit products you have had or sought and how you have managed your obligations;
- if you make a hardship application, other information about your personal circumstances.

Sometimes we collect credit information about you from other people. This may happen without your direct involvement. For instance, we may collect credit reports from credit reporting bodies or opinions from other lenders about your creditworthiness. We may also seek credit information about you from:

- other related companies;
- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you; and
- commercial information service providers, such as companies that provide fraud prevention reports.

FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE AND DISCLOSE CREDIT INFORMATION?

The main reason we collect, use, hold and disclose credit information is to provide you with products and services. This includes:

- checking whether you are eligible for the product or service;
- providing the product or service; and
- helping manage the product or service.

If you are offering to act as guarantor your credit information may be necessary to assess whether the borrower will be eligible for a loan if you act as guarantor.

We may also use your credit information for other purposes. For instance, to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and help us run our business. We may also use your credit information to tell you about products or services we think may interest you, subject to legal restrictions on using this type of information for marketing purposes.

HOW DO WE HOLD CREDIT INFORMATION?

We will hold your personal information in paper or other physical form, but it is usually held in electronic form on our systems. Service providers may hold the information for us. Your personal information is protected by various physical, electronic and procedural safeguards. Where a service provider holds your information, we require those service providers to adhere to our approved standards of security and confidentiality to ensure the continuing protection of your personal information.

We train staff who handle your personal information to ensure that your personal information is handled appropriately. Our procedures ensure that your personal information is only made available to staff where necessary.

WHO DO WE DISCLOSE YOUR CREDIT INFORMATION TO, AND WHY?

The way we approve and manage credit involves a range of tasks. Some of these tasks are carried out for us by third party service providers, both in and outside Australia, including in the Philippines. In carrying out these tasks, service providers may have access to credit related personal information. To protect your credit information, we enter into contracts with the service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the credit information we disclose to them for the specific role we ask them to perform.

Generally, we disclose credit information to organisations that help us with our business. These may include:

- other related companies;
- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- credit representatives who sell products and services on our behalf;
- payment systems operators (for example, merchants receiving credit card payments);
- other organisations, who jointly with us, provide products or services to you;
- other financial services organisations, including banks and credit providers;
- organisations involved in our funding of loans (including securitisation trustees, investors and their advisers);
- credit reporting bodies;

- organisations that provide us with insurance to cover our lending risks;
- entities who wish to be involved in our business, or acquire an interest in our business;
- our financial advisers, legal advisers or auditors;
- our assignees or potential assignees, or where we act as an agent for, or otherwise on behalf of, another person, to the principal or that other person;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- your co-applicant (if any);
- if appropriate, guarantee or security providers;
- organisations involved in the funding (or potential funding) of the Lender's loans (including securitisation trustees, investors and their advisers);
- the Lender's assignees or potential assignees.
- government agencies or dispute resolution schemes that assist consumers in relation to credit; and
- where permitted by law, debt collection agencies or other lenders.

We may also disclose your credit information to others where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or we are otherwise permitted to disclose the information under the Privacy Act.

As permitted under the Privacy Act, we may participate in repayment history reporting. When we receive a loan application, we may get information about whether the applicant has a history of making required repayments on time and whether any have been made after they are due. For all borrowers, we may periodically report the same information to credit reporting bodies.

CREDIT REPORTING BODIES AND YOUR PERSONAL INFORMATION - NOTIFIABLE MATTERS

Credit reporting bodies are allowed under the Privacy Act and the CR Code to handle personal information relating to credit. If you apply for any kind of credit or offer to act as guarantor, we may disclose your personal information to, or collect personal information about you from, a credit reporting body. This information is used for the purpose of determining your eligibility for credit, and we may process the information to create an unsuitability assessment or other ratings of your suitability for credit.

Credit reporting bodies may include your personal information in reports that they provide to credit providers to assist those providers in assessing your credit worthiness (such as when you have applied for a loan from the provider).

The credit reporting bodies we deal with are:

- Equifax www.equifax.com.au
- Veda Advantage Ltd www.veda.com.au
- Dun & Bradstreet - www.dnb.com.au
- Experian ww.experian.com.au

For contact details and information on how credit reporting bodies manage credit related personal information, please see their privacy policies available at the links above.

Credit reporting bodies offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called “credit pre-screening”. You have the right to request that the credit reporting bodies do not use your information for this purpose. To opt out of credit pre-screening, contact the credit reporting body, using the contact details on their websites noted above.

You can also ask a credit reporting body not to use or disclose your personal information for a period if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

The Privacy Act and the CR Code limit what we can do with the information we obtain from a credit reporting body. Generally, it can only be used in relation to the consumer credit products you hold through us. For example, if you fail to meet your payment obligations in relation to consumer credit, or commit a serious credit infringement, we may be entitled to disclose this to a credit reporting body.

ACCESS TO AND CORRECTION OF CREDIT INFORMATION

You can request access to credit information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee for requesting that your credit information is corrected or for us to make corrections. In processing your request for access to your credit information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your credit information.

If we refuse to give you access to or to correct your credit information we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your credit information, you also have the right to request that a statement be associated with your credit information noting that you disagree with its accuracy.

If we refuse your request to access or correct your credit information, we will also provide you with information on how you can complain about the refusal.

RESOLVING YOUR CREDIT INFORMATION CONCERNS AND COMPLAINTS - YOUR RIGHTS

If you are concerned about how your credit information is being handled or if you have a complaint about a breach by us of the credit reporting provisions of the Privacy Act or the CR Code, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

Australian Financial Complaints Authority (AFCA) can consider most complaints about your credit information involving providers of financial services.

AFCA can be contacted at:
GPO Box 3 Melbourne VIC 3001
Phone: 1800 931 678
Email: info@afca.org.au
Website: www.afca.org.au

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your credit information.

The Commissioner can be contacted at:
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au

CONTACT US

You can contact us by:

calling (02) 9258 8888

email to us at lending@aquamore.com.au

writing to us at Governor Phillip Tower, Suite 40.01, Level 40, 1 Farrer Place NSW 2000

CHANGES TO THE CREDIT REPORTING POLICY

We may change the way we handle credit information from time to time for any reason. If we do so, we will update this Credit Reporting Policy. An up-to-date version is available on www.aquamore.com.au