



## **Our Policy On Your Privacy**

At *Access Capital*, we understand that the details you provide us are private and personal. It's important that you understand how we protect your privacy, as well as how, when and where we may use your details.

The following is our commitment to you, on what our policies towards your privacy are. You can be confident in the fact that we abide by the National Privacy Principles for the protection of personal information (including credit information and the credit eligibility information), as set out in Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act (Cth) 1988 together with the Credit Reporting Code.

### **What do we mean by 'personal information'?**

Personal information means any details or opinion about you, from which your identity is apparent or your identity can be uncovered. The types of personal information that we collect includes the following information about you which is relevant to our relationship or the product or service you are enquiring about: financial information and history, banking details, personal identification, contact details, personal and trade references, employment or business history details together with the reason you might be applying for a financial product or service.

#### *Sensitive information*

Sensitive information is a subcategory of personal information which includes information about your health. We may be required to collect sensitive information about your health in certain circumstances, for example when you make application for assistance with financial hardship caused by illness or injury. We realise that this is often sensitive information and we will treat it with the highest degree of security and confidentiality.

### **What is Credit Eligibility Information?**

Credit eligibility information is personal information that has been obtained from a credit reporting body (CRB) eg, a consumer credit report, or personal information that has been derived from that information, that is about an individual's consumer credit worthiness.

The kind of information we might derive from a consumer credit report includes:

- Information which assists us to assess your suitability for credit
- Information about your credit history with credit providers
- The likelihood of you being able to meet your commitments

### **What is Credit Information?**

Credit information is certain types of personal information that includes the following:

- Information about an individual, like their name and address, that we may use to identify that individual
- Information about an individual's current or terminated consumer credit accounts and, from 12 March 2014, an individual's repayment
- The type and amount of credit applied for in any previous consumer or commercial credit applications to any credit provider, where the credit provider has requested the information
- Information about an individual from a CRB
- Information about a consumer credit payment overdue for at least 60 days and for which collection action has commenced
- Advice that payments that were previously notified to a CRB as overdue are no longer overdue
- Information about new credit arrangements an individual may have made with a credit provider, in relation to consumer credit currently or previously held, to deal with any defaults or serious credit infringements by that individual.
- Information about court judgements which relate to credit that an individual has obtained or applied for
- Information about an individual on the National Personal Insolvency Index
- Publicly available information about an individual's credit worthiness
- An opinion of a credit provider that an individual has committed a serious credit infringement of credit provided by the credit provider

We will hold all of this information about an applicant for credit, a guarantor, or related person (eg, a director of a company) which has applied for credit.

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

We only collect personal information (including credit information and credit eligibility

information) from and about you to enable us in providing the services you require from us. The personal information we collect may include financial information and history, banking details, personal identification, contact details, personal and trade references, employment or business history together with the reason you might be applying for a financial product or service. If you choose not to provide this information, our ability to assist you may be restricted.

We may use the information we gather to provide targeted and value-added products and services to you through direct marketing. These direct marketing offers and promotions are designed to make your life easier, not harder. But if you do not want to receive them, just let us know when we contact you – refer to Direct Marketing Offers and Information section for further details.

We may also collect your personal information to comply with legislative and regulatory requirements, for example under the Anti-Money Laundering and Counter-Terrorism Financing Act 2008 (Cth) and / or the National Consumer Credit Protection Act 2009 (Cth).

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

We will always aim to collect your personal information directly from you, either in person or through our website when you choose that method of providing your information, or from your agent or intermediary. Occasionally, we may need to obtain personal information (including credit information and credit eligibility information) about you from a third party for a particular purpose. Third parties can include credit reporting agency, financiers, employees, agent or contractors, your representatives such as financial advisers or accountants, your insurers, publicly available sources (eg telephone directories) government agencies (eg Centrelink) and CRBs . Before doing so or prior to collecting the information we need, we will inform you of the type of organisations we intend to obtain or disclose your personal information to.

### **Dealing with us anonymously or using an alias**

We will generally need to know who you are in order to provide you with the products and services you require.

Despite this, in some circumstances you are entitled to deal with us anonymously, or by using a pseudonym (alias), for example when you are making general enquiries about the services we offer.

You must tell us when you are using a pseudonym when applying for our services. If we need to identify you, we will tell you whether or not your real name is required to access those services.

### **Why will we disclose information to another organisation?**

At *Access Capital*, we aim to provide our customers with the very best service and products.

We will perform functions and activities that you authorise via our Privacy Consent form titled 'Acknowledgement and Consent' which involves handling personal information (including credit

information and credit eligibility information) for individuals, to arrange finance.

Some of those other functions and activities where we use your information include our internal administrative, product or service development, marketing, planning and research requirements as well as future offers of products or services to you.

We will disclose personal information to third parties only as the Privacy Act permits and where there is valid reason to do so, such as it is necessary to ensure products and services that are most appropriate to your needs are made available to you.

Third parties may include:

- Guarantors
- Credit providers, credit reporting agencies and providers of securitisation arrangements.
- Related bodies corporate, employees, agents, contractors and advisers
- Services providers (eg computer systems consultants, trust managers, document custodians, mailing houses etc) to enable them to perform those services.
- Your agents and intermediaries
- Insurers, insurance brokers, insurance assessors and valuers
- Overseas service providers, which may perform a range of technology, operational and service functions
- IT Cloud provider, Interactive Gateway Australia Pty Ltd providing data storage capability.

As you will appreciate, in certain circumstances we may be compelled by law to disclose your personal information to various authorities. For instance, we may be required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2008 (Cth) and / or the National Consumer Credit Protection Act 2009 (Cth) to disclose details of financial transactions and we may also be compelled under tax laws to provide such information. This is to your benefit, and helps us to provide the products and services you would expect.

Before we disclose any of your personal information to any other organisation, we will take reasonable steps to ensure that:

- The organisation has the same commitment as us to the protection of your personal information AND
- You have consented to us doing so. By consent, we mean approval in writing or orally.

### **Exchange of information with overseas parties**

Some of the parties with which we exchange your personal information, including our service

providers and other third parties listed above, may be located outside of Australia in countries including New Zealand, Philippines, India, Singapore and the United States of American.

### **Direct marketing offers and information**

The details you give us may be used to inform you about any special offers we think will be of interest to you, and to update you on new products and services or changes to our website. We may also send you details of offers or services provided by our business partners. You may at any time choose not to receive these communications. Doing so will not cost you anything, and we will aim to ensure you stop receiving any unwanted communications as soon as possible. Should you wish to 'opt out' of receiving any or all direct marketing material and information, please let us know by either emailing on [support@accesscapital.com.au](mailto:support@accesscapital.com.au) or calling on 08 8334 2100.

### **How do we store personal information?**

We store your personal information (including credit information and credit eligibility information) in a number of ways including:

- Electronic systems and devices
- In paper files

This may also include storage on our behalf by third party service providers. See our comments below about how we protect your personal information.

### **How safe and secure is the information we hold about you?**

We take great care with the information we hold about you. Our aim is to ensure that any details are securely protected from misuse, loss, and unauthorised access, modification or disclosure. We will take reasonable care to make sure that we keep your information in an accurate, complete and up to date manner. When that information is no longer needed, it will be permanently destroyed or de-identified.

### **How do we protect personal information?**

- We take all reasonable steps to protect your personal information (including credit information and credit eligibility information) from misuse, loss and unauthorised access, modification or disclosure. These include:
- Using appropriate information technology and processes
- Restricting access to your personal information to those who perform services for us who need your personal information to do what they are engaged to do.
- Protecting paper documents from unauthorised access at all times.

- Using computer and network security systems with appropriate firewalls, encryption technology and passwords for protection of electronic files
- Securely destroying or 'de-identifying' personal information if we no longer require it subject to our legal obligations to keep some information for certain specific periods.
- Obtaining certain personal information from you when you wish to discuss any issues relating to the products and services to you.

Whilst we take reasonable measures, no data transmission over the internet can be guaranteed as fully secure and accordingly, we cannot guarantee or warrant the security of any information you may send to us online. You submit information over the internet at your own risk.

### **How we keep your personal information accurate and up to date?**

It is important for us, and for you, that the information we hold is accurate and up to date. In this, we rely on you to help us. We ask that you contact us whenever there are any changes to your personal details, so that we can update our records.

Under the Privacy Act, you also have a right to request that we correct information (including credit information and credit eligibility information) that you believe to be inaccurate, out of date, incomplete, irrelevant or misleading.

If at any time you believe that personal information about you is inaccurate, out of date, incomplete, irrelevant or misleading, please advise us by contacting our Privacy Officer :

by post at :

The Privacy Officer  
Access Capital Pty Ltd  
PO Box 446, KENT TOWN SA 5071

or telephone the Privacy Officer on 08 8334 2100  
or email the Privacy Officer at [support@accesscapital.com.au](mailto:support@accesscapital.com.au)

We will take all reasonable steps to correct the information. If we do not correct the information, you can also ask us to include with the information held, a statement from you claiming that the information is not correct.

If there is a denial of access to your personal information or a dispute as to the correctness of any personal information held, we will provide you with the reasons for the denial or refusal to correct the personal information. If you disagree with our decision for the denial or refusal to correct the personal information, you may request that we review the decision via our complaints handling procedures which are set out below.

## **Access to your personal information**

You can access the personal information we hold about you by contacting our Privacy Officer:

by post

The Privacy Officer  
Access Capital Pty Ltd  
PO Box 446, KENT TOWN SA 5071

or telephone the Privacy Officer on 08 8334 2100  
or email the Privacy Officer at [support@accesscapital.com.au](mailto:support@accesscapital.com.au)

## **How long do we keep information about you?**

By law, we are required to hold certain information about you, even after you are no longer an *Access Capital* customer. However, after such time you can be assured we will destroy your personal information thoroughly and safely. We may also hold certain information about you if it is needed for a purpose which you are aware of or reasonably expect us to hold the information. When that information is no longer needed, it will be destroyed or permanently de-identified.

## **Who do you contact if you have any complaints and concerns?**

At *Access Capital*, we value our customers. We will always aim to be fair and responsive. If you have a complaint, you have the right to expect that we will handle it in a friendly and professional way. When we receive a complaint, we look on it as valuable feedback that may help us to improve the services we offer and to ensure your needs are met in a satisfactory and appropriate manner. If you wish to complain, at any time, about the handling, use or disclosure of your personal information, contact us:

by post:

The Privacy Officer  
Access Capital Pty Ltd  
PO Box 446, KENT TOWN SA 5071

or by telephone 08 8334 2100  
or email the Privacy Officer at [support@accesscapital.com.au](mailto:support@accesscapital.com.au)

## **Internal Dispute Resolution**

Our representative will be in contact with you regarding your complaint and will let you know who will be assisting you, their contact details and the expected resolution date of your issue within 48 hours.

If the issue is a more complicated one, we may ask you for additional documentation to assist

resolve the issue. We will keep you informed on the progress of your complaint.

We will make all efforts possible to investigate your complaint, and advise you of the outcome as soon as possible.

### **External Dispute Resolution**

In the unlikely event that your complaint is not resolved to your satisfaction through the internal procedures outlined above, you can then refer your complaint to external dispute resolution.

To lodge a complaint about the way we handle your personal information you should contact the Australian Information Commissioner, who can be contacted at:

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2000  
Telephone: 1300 363 992

### **How do you obtain our privacy policy?**

This privacy policy may change over time. You can obtain the current version from our website [www.accesscapital.com.au](http://www.accesscapital.com.au) or by contacting our Privacy Officer:

The Privacy Officer  
Access Capital Pty Ltd  
PO Box 446, KENT TOWN SA 5071

or email the Privacy Officer at [support@accesscapital.com.au](mailto:support@accesscapital.com.au)