

PRIVACY POLICY

Purpose

This Privacy Policy is intended to provide a summary of Australian First Mortgage's (afm) current approach to the handling of personal information (including credit – related information). afm is committed to complying with the Privacy Act 1988 (Cth) (including the Australian Privacy Principles) and the Credit Reporting Privacy Code (CR Code). afm will provide a free copy of this policy to anyone who asks for it.

Effective date

This policy is effective immediately, and will be reviewed annually or as deemed necessary.

Supercedes

All previous documents, practices and policies relevant to this Privacy Policy.

Person responsible

The Privacy Officer has the primary responsibility for performance of the duties under this policy.

Types of information AFM collects

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

The kinds of personal information we collect will depend upon the purposes for which it is collected. When an individual applies for a product or service we will collect the information we consider is or may be necessary to enable us to assess the application, to provide the product or service, and to administer the product or service after it has been provided.

Examples of personal information collected by afm include name, date of birth, current and previous residential addresses, telephone number, email address, employer, place of work, occupation, business experience, income, assets, liabilities, credit history and other financial and credit-related information. We may also collect driver's licence number, passport number or other identification information provided in connection with an application (including 100 point check or identification reference) for afm to establish your identity and the identity of signatories to accounts.

We may collect credit reporting information about individual loan applicants or guarantors. We always obtain written consent before doing this. The types of credit reporting

information that may be provided to afm by credit reporting bodies include:

- Identity details;
- Credit history;
- Consumer and commercial credit enquiries;
- Consumer payment default history;
- Personal Property Security Register details; and
- Public record information such as court judgements, details of companies of which you are a director, or businesses of which you are a proprietor, details of previous and disqualified directorships and bankruptcy information.

Personal information can include sensitive information. Sensitive information is defined in the Privacy Act as information or an opinion about a person's race, ethnic origin, political opinions, membership of political associations and trade associations, religious or philosophical beliefs, sexual orientation or practices, or criminal record, health information, genetic information about an individual that is not otherwise health information, biometric information that is used for the purpose of automated biometric verification or biometric identification and biometric templates.

afm may collect health information, information about membership of political associations and trade association and criminal records, where required for our business purposes. Where health details or other sensitive information are required in order for us to provide a product or service, it will not be used for any other purpose than that for which it was collected.

afm does not usually request tax file numbers except if required for purposes authorised by taxation law, such as for the provision of Annual Investment Reports to the Australian Taxation Office. If tax file numbers are otherwise inadvertently provided with loan application documentation, they are redacted from the relevant documents by our staff.

How does AFM collect and hold personal information?

We will generally collect the personal information we need about an individual directly from that individual whenever it is reasonable and practicable to do so (e.g. face to face, telephone or through completion of forms). We may do so when:

- an individual applies for any of our products or services; or
- an individual contacts us to enquire about our products or services.

We may also obtain personal information (including credit-related information) about an individual who is seeking credit or who has offered to be a guarantor, from third parties including:

- from a credit reporting body such as Equifax Group, Dun & Bradstreet (Australia) Pty Ltd (DNB), Experian Australia Pty Ltd (Experian), or another credit provider, if the individual

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has given consent in accordance with Part IIIA of the Privacy Act 1988;

- from a mortgage broker or one of our partners or another party who introduces the individual to us;
- mortgage insurers;
- other credit providers;
- any referees an individual provides;
- other third party services providers.

If an individual is seeking credit we may contact the individual's employer to confirm that the employer employs the individual.

If you visit our website, certain information can be collected as set out in our Website Privacy Statement.

Entities we may disclose personal information to in the course of our business include:

- credit reporting bodies such as Equifax Group, DNB or Experian (subject to prior consent);
- debt collection agencies;
- regulatory bodies such as ASIC and APRA;
- government agencies, law enforcement bodies and Courts;
- other credit providers including any of:
 - ING Bank Australia Limited, ABN 24 000 893 292;
 - Bendigo and Adelaide Bank Limited, ABN 11 068 049 178;
 - Advantedge Financial Services Pty Ltd, ABN: 36 130 012 930 part of National Australia Bank Group and associated entities;
 - Resimac Ltd, ABN 67 002 997 935;
 - Perpetual Trustee Company Ltd;
 - Perpetual Trustees Victoria Ltd ABN 47 004 027 258;
 - Permanent Custodians Ltd ABN 55 001 426 384;
 - BNY Trust Company of Australia Limited ABN 70 000 511 071;
 - Firstmac Origination Pty Ltd;
 - First Mortgage Company Home Loans Pty Ltd ABN 37 099 125 318;
 - Challenger Mortgage Management Pty Ltd ABN 72 087 271 109 and associated entities;
 - AFSH Nominees Pty Ltd (and associated entities) ABN 51 143 937 437;
 - Pepper Group Limited ABN 55 094 317 665;
 - Pepper Homeloans Pty Limited ABN 86 092 110 079;
 - Pepper Finance Corporation Limited ABN 51 094 317 647;
 - Origin Mortgage Management Service Pty Ltd ACN 601 349 071 on behalf of Columbus Capital Pty Limited ACN 119 531 252;
 - La Trobe Financial Asset Management Limited ABN 30 006 479 527
- account holders and operators;
- referees, guarantors and employers nominated by customers;
- authorised agents, executors, administrators, financial advisors, lawyers and other professional representatives
- nominated by customers;
- valuers;
- our service providers, contractors, agents, partners, auditors, lawyers and other professional advisors;
- any person to the extent necessary, in afm's view, to carry out a customer's instruction given to afm;
- insurers, where insurance is provided in connection with our services to you;
- mortgage insurers (including QBE Lenders' Mortgage Insurance Limited (ABN 700 000 511 071) at Level 1, 50 Bridge Street, Sydney NSW 2000; Genworth Financial Mortgage Insurance Pty Limited (ACN 60 106 974 305) at Level 23, AAP Centre, 259 George Street, Sydney NSW 2000; First American Title Insurance of Australia Pty Ltd ABN 64 075 279 908, PO Box Q1465 QVB Post Office NSW 1203);
- loan introducers, dealers and brokers;
- State and Territory authorities that give assistance to facilitate the provision of home loans to individuals;
- certain entities that have bought or otherwise obtained an interest in your credit product, or that are considering doing so, and their professional advisers;
- the Australian Taxation Office, Australian Transactions Reports and Analysis Centre (AUSTRAC), and other regulatory bodies, government agencies and authorities, external dispute resolution bodies, law enforcement bodies and courts.

Why does AFM need personal information?

We only collect personal information if it is reasonably necessary for one or more of our business functions or activities.

The purposes for which afm collects, holds, uses and discloses personal information include opening of accounts (including identity verification requirements), assessing and actioning credit applications, loan account management, providing or managing other products and services including securitisation of loans, effecting transactions authorised by you, account administration, planning, product research and development, other internal management functions and operations related to the provision or management of products by afm, management of our business, enhancing afm's relationship with you, seeking credit information from credit reporting bodies such as Equifax Group, DNB and Experian, debt collection, complying with our legal obligations, audit, assessment of employment applications and to provide information required by law for employment purposes.

We never sell or disclose any personal information to third parties for direct marketing by other organisations.

We never use sensitive information or credit eligibility information for direct marketing purposes without that individual's consent.

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Credit-related information

This section provides more information about how we deal with credit-related information. Credit reporting information is only sought by afm with the written consent of the individual borrower or guarantor concerned.

afm may provide the following types of credit information to credit reporting bodies with a request for credit reporting information:

- Name;
- Date of birth and sex;
- Driver's licence or other identification information;
- Current and previous addresses;
- Current and last employer;
- The fact that the individual has applied for credit (including the type of credit and the amount of credit).

afm may use and disclose credit information and credit eligibility information, as well as other information provided by borrowers and guarantors, as follows:

- to verify identity;
- to assess an application for credit;
- for credit guarantee purposes;
- for securitisation purposes;
- for the purpose of assisting an individual to avoid defaulting with respect to any credit provided by afm;
- to disclose to debt collectors for the purpose of collecting overdue payments;
- to provide information to an Australian mortgage insurer for a mortgage insurance purpose;
- to seek from and use or give to another Australian credit provider any information about an individual's account, credit worthiness, credit standing, credit history or credit capacity;
- to seek from and use or give to any mortgage originator, broker, financial consultant, agent, accountant, lawyer, or other adviser acting in connection with any financing provided or proposed to be provided by afm;
- to provide information to any person who proposes to guarantee or has guaranteed repayment of any credit provided to an individual, or who has provided property as security for any credit provided to an individual;
- to establish, provide, manage or administer any credit facility and to perform any other internal administrative and management functions and operations directly related to the provision or management of credit;
- to disclose serious credit infringements, provided afm believes on reasonable grounds that a serious credit infringement has occurred;
- for external dispute resolution purposes;
- for mortgage credit assistance scheme purposes;
- as required or permitted by law or a court/tribunal;

- to people considering acquiring an interest in our business or assets.

The kinds of information afm may derive from credit reporting information obtained from Equifax Group, DNB and Experian includes an opinion about your eligibility for credit.

Credit eligibility information will be held and used in accordance with Part IIIA of the Privacy Act 1988 (Cth), this policy, and the terms of the consent provided by the relevant individuals.

afm is not likely to disclose any credit information or credit eligibility information to entities that do not have an Australian link.

Government related identifiers

We do not use any government related identifiers, such as driver's licence numbers, as its own internal identifier of any individual. We will not use or disclose any government related identifiers other than in accordance with the Privacy Act 1988 (Cth).

Data integrity and security

afm tries to ensure that all personal information it holds is accurate, complete and up-to-date. To assist us with this, individuals should contact us if any of their personal information changes, or if they believe that the personal information we have is not accurate or complete.

afm takes reasonable steps to protect the personal information that it holds from misuse, interference or loss, or from unauthorised access, modification or disclosure. If afm no longer requires personal information that it holds, it will take such steps as are reasonable in the circumstances to destroy the information or ensure that the information is de-identified.

Disclosure of data overseas

The Insurers and Credit Providers may disclose your personal and credit information overseas including in the United States of America, The European Union, Canada, India, Malaysia, Philippines, Asia Pacific, New Zealand and United Kingdom. More information on overseas disclosure may be found in the relevant entities' privacy policies.

We may, or an Insurer may, store your information in cloud or other types of networked or electronic storage and will take reasonable steps to ensure its security, however, it is not always practicable to find out where your information may be accessed or held, as electronic or networked storage can be accessed from various countries via an internet connection.

We have a contract in place that requires our service provider

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to only deal with the personal information for the purpose of providing services to afm, and to observe the Australian Privacy Principles when handling any personal information that we disclose to them. Under our contract, the service provider is not permitted to disclose that personal information to any sub-contractors or other third parties.

We are otherwise unlikely to disclose your personal information to overseas recipients, however if we do so, it will be in accordance with the Privacy Act 1988 (Cth).

Access and correction

Individuals can ask afm for access to their personal information held by afm (including credit – related information) by sending a written request to our Privacy Officer at Email: compliance@afm.com.au. The request must identify the individual and, with reasonable particularity, the information required.

afm does not impose a charge for making a request for access, however we may charge for reasonable administrative costs incurred in providing access.

An individual can ask afm to correct or update that individual's personal information (including credit related information). afm does not impose any charge with respect to requests for correction or updates.

Before correcting or providing access to personal information in response to a request, afm will require the individual's identity to be confirmed.

Requests for access or correction may be refused upon the grounds contained in the Privacy Act 1988 (Cth). If we refuse to provide access, or to correct personal information, we will provide reasons for the refusal.

afm will respond to an individual's request for access as soon as reasonably practicable, taking into account the age, nature and amount of the information requested.

Individuals have the right to request a copy of the credit information that credit providers hold about them and to have the credit information corrected if it is inaccurate.

To contact:

- **Equifax Group** see www.equifax.com.au;
- **DNB** see www.dnb.com.au;
- **Experian** see www.experian.com.au

Complaints

Any privacy related complaint (including complaints about breaches of the Privacy Act 1988 (Cth) or the CR Code) should

be directed to our Privacy Officer at:

Australian First Mortgage
PO Box 2087
Broadbeach QLD 4218
Email: compliance@afm.com.au

No charge will be imposed for the making of a complaint, or for dealing with the complaint.

afm will provide a written notice within 7 days that acknowledges the complaint and sets out how the complaint will be dealt with. afm will also investigate the complaint. This may involve consultation with other credit providers or credit reporting bodies. afm will, within 30 days after the date that a complaint is made, set out in writing its decision following the investigation and details of the right to refer to our external dispute resolution scheme.

To lodge a complaint before 1 November 2018, contact:

The Credit & Investments Ombudsman Australia

Online: www.cio.org.au
Email: info@cio.org.au
Phone: 1800 138 422
Mail: Credit and Investments Ombudsman
Reply Paid 252
South Sydney NSW 1234

To lodge a complaint on or after 1 November 2018, contact:

The Australian Financial Complaints Authority

Online: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678 (Free Call)
Mail: Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

You may also contact the Office of the Australian Information Commissioner at:

GPO Box 5218
SYDNEY NSW 2001
Telephone: 1300 363 992
Website: www.oaic.gov.au

Additional matters

This document does not create any legally enforceable rights or obligations beyond the rights and obligations created by the Privacy Act 1988 (Cth) or the CR Code. This policy may be varied from time to time.