

PRIVACY AND CREDIT REPORTING POLICY

Please read this policy before you provide us with any personal information.

ABOUT THIS PRIVACY POLICY

We respect your personal information, and this Privacy Policy explains how we handle it.

The policy covers Coogans Group Pty Ltd, T/A Coogans Finance (Australian Credit Licence 517441) and, services provided by Chris Brown, leading specialist with Coogans Choice Pty Ltd, Credit Representative (No. 564277) of Buyers Choice Licencing Pty Ltd (Australian Credit Licence 509484).

This Policy also includes our credit reporting policy, that is, it covers additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information below as credit information.

If you are in a country that is a member of the European Economic Area (EEA), the EU General Data Protection Regulation 2016/679 (**GDPR**) governs the way we collect, use, hold, process and disclose your personal information. Under the GDPR, we are a data controller. We make decisions on how and why your personal information is processed.

What type of personal information do we collect and hold

General Information

The types of personal information We may collect and hold about you may include:

- name, postal address, email address, telephone numbers, sex, date of birth
- employment and income details
- drivers' licence number
- Centrelink identification number
- marital status
- drivers licence number
- car registration number
- other contact details such as social media handles
- financial details such as your tax file number
- real estate agents name & phone number
- billing and payment details
- any complaint details
- name, address, and phone number of two contacts
- credit information such as details relating to credit history, credit capacity, and eligibility for credit

When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws which require us to collect personal information. For example, we require personal information to verify your identity under Australian Anti-Money Laundering law.

What do we collect via your website activity

If you're an internet customer of ours, we monitor your use of internet services to ensure we can verify you and you can receive information from us.

We also know that some customers like to engage with us through social media channels. We may collect information about you when you interact with us through these channels. However, for all confidential matters, we'll ensure we interact with you via a secure platform.

To improve our services and products, we sometimes collect de-identified information from web users. That information could include IP addresses or geographical information to ensure your use of our web applications is secure.

This website uses cookies to allow us to identify regular visitors and collects information about website visitors' usage.

Cookies do not collect nor store any personal information and do not personally identify users.

Most browsers are set to accept cookies automatically. However, you can turn off the 'Save Cookies' function or set your browser so that it informs you whenever cookies are transmitted.

Credit reports

When you apply for credit, we need to know if you will be able to meet repayments under your credit contract with us. As such, we need to obtain a credit report about you.

Credit reports contain information about your:

- credit history which helps us to assess your credit application,
- verify your identity, and
- manage the accounts you hold with us.

Credit reporting bodies can collect and disclose this information to us and other credit providers in proscribed circumstances, including when you make an application for credit or when we seek to help you avoid defaulting on your credit obligations.

The Privacy Act limits the information that credit providers can disclose about you to credit reporting bodies, as well as the ways in which credit providers can use credit reports.

Credit information

To assess your creditworthiness, we may share and collect information about you with credit reporting bodies.

This information provided may include:

Identification information

- your full name, an alias or previous name
- date of birth
- gender
- your current or last known address, 2 previous addresses (if any)
- name of current or last known employer
- drivers licence number

Consumer Liability Information relating to consumer credit

- name of the credit provider
- whether the credit provider has an Australian Credit Licence
- the type of consumer credit
- the day on which the consumer credit was entered into and terminated
- certain repayment terms and conditions
- maximum amount of credit available

Your credit history

- whether you have made monthly payments and when they were paid
- where a credit provider has asked a credit reporting body for information in relation to a credit application, including the type and amount of credit applied for
- default information, including information about overdue payments
- if a credit provider has disclosed default information about you to a credit reporting body including when the overdue amount is paid
- a credit provider has disclosed default information to a credit reporting body about you and your consumer credit contract is varied or replaced
- court proceeding information
- your personal insolvency information.
- publicly available information that relates to your activities in Australia and your creditworthiness
- serious credit infringement information, a credit provider reasonably believes that you have committed a serious credit infringement (such as fraud).

Please note that information We obtain from credit reporting bodies or information We derive from such information is known as **credit eligibility information**.

How do we collect your personal information

We collect your personal information so that we can perform our functions and activities.

We will, if it is practicable and reasonable to do so, collect personal information directly from you. This may happen when you give us personal information over the telephone, face to face, via email or through our website.

If you do not provide your personal information to us, we may not be able to:

- provide you with the product or service you want
- for us to give you the credit assistance you seek from us
- to assist in finding a loan or lease relevant to your circumstances
- verify your identity or protect against fraud
- to let you know about other products or services that might be suitable for your financial needs.
- manage your account

Credit information

Unless it's unreasonable or impracticable we will try to collect personal information directly from you (referred to as '**solicited information**'). For this reason, it's important that you help us to do this and keep your contact details up to date.

There are several ways in which we may seek information from you. We might collect your information when you fill out a form with us, when you've given us a call or used our website. We also find using electronic means, such as email or SMS, a convenient way to communicate with you and to verify your details.

Sometimes, we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example:

- we collect information from third parties about the loan or lease made available to you arising out of the services we provide you
- where we can't get hold of you and we rely on public information (for example, from public registers or social media or made available by third parties) to update your contact details
- we exchange information with your legal or financial advisers or other representatives
- we request a report about your credit history from Credit Reporting Bodies
- we request information from other credit providers about the products they provide to you
- debt collecting agencies

The *National Consumer Credit Protection Act 2010* (Cth) requires credit providers like us to make inquiries into the financial situation, needs and objectives of individuals who apply for credit. This is to ensure that we have enough information to make an informed decision about whether the individual can afford the credit they are applying for.

How we collect and hold your credit information

We will collect your credit information during enquiries we make of you relating to the credit assistance you seek from us. In addition to what we say above about collecting information from other sources, other main sources for collecting credit information are:

- your co-loan applicants or co-borrowers
- your guarantors/proposed guarantors
- your employer, accountant, real estate agent or other referees
- your agents and other representatives like the person who referred your business to us, your solicitors, conveyancers and settlement agents
- organisations that help us to process credit applications
- organisations that check the security you are offering such as valuers
- bodies that issue identification documents to help us check your identity and our service providers involved in helping us to process any application you make for credit through us

Purposes for collecting, holding, using, and disclosing information

We collect, hold, use and disclose your personal information (including credit information) for the following purposes:

- to give you credit assistance
- to give you information about loan products or related services including help, guidance and advice
- to consider your request for a product or a service
- to inform you about other products and services that may be of interest to you
- consider whether you are eligible for a loan or lease or any related service you requested including identifying or verifying you or your authority to act on behalf of a customer
- assist you to prepare an application for a lease or a loan
- administer services we provide, for example, to answer requests or deal with complaints
- administer payments we receive, or any payments we make, relating to your loan or lease
- to assess your creditworthiness for providing or extending credit
- to process your credit application.
- billing purposes
- to consider hardship requests
- to arrange payment plans
- to manage accounts and perform administrative and operational tasks
- marketing (direct, indirect, inbound, and outbound) purposes
- to assist in arrangements with other organisations
- to collect overdue payments
- dispute resolution purposes
- to manage and deal with any possible legal actions
- as required by any applicable laws, regulations, or codes of practice
- IT system management & maintenance
- to assist with debt collection/skip tracing
- insurance claims

Use and disclosure of personal information

Personal information we hold about you that was collected for a particular purpose will not be disclosed for another purpose unless:

- you have consented to the use or disclosure of the information for another purpose; or
- the access, use or disclosure is otherwise permitted under the Privacy Act.

Where your personal information is disclosed, we will seek to ensure that information is used, held, and disclosed consistently with the Privacy Act and any other applicable laws.

We do not disclose any of your information (including credit information) to any overseas organisations or entities.

What do we do when we get information we didn't ask for

Sometimes, people share information with us we haven't sought out (referred to as '**unsolicited information**'). Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

When will we notify you that we have received your information

When we receive personal information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

How do we take care of your personal information

We store Your personal information (including credit eligibility information) in different ways, including in paper and electronic form.

We treat all personal information as confidential. We will take all reasonable steps to ensure personal information is protected from:

- misuse, interference, and loss
- unauthorised access, modification, and disclosure
- storing electronic documents, records, and information within our secure computer system
- making access to personal information only available to approved users with a username and password log in facility
- using secure methods of communication
- using antivirus, anti-spyware where possible
- using back-up and recovery systems
- storing hard copies of personal information on Our Premises in secure areas with restricted access

Direct marketing

We may use or disclose your personal information to let you know about other products or services we or a third party make available and that may be of interest to you.

All our marketing correspondence will display a clearly visible and user-friendly opt-out or unsubscribe option. We may imply consent to receive marketing material if you do not select the opt out or unsubscribe option.

We will always let you know that you can opt out of receiving marketing offers.

With your consent, we may disclose your personal information to third parties for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organisation.

What are the other ways we use your information

- To inform you about other products or services we make available and that may be of interest to you, unless you tell us not to
- To assist with identifying opportunities to improve our service to you and improving our service to you
- To allow us to run our business efficiently and perform general administrative tasks
- To assist in prevent any fraud or crime or any suspected fraud or crime
- As required by law, regulation or codes binding us
- To any purpose to which you have consented.

What are the grounds which we will deal with your personal information under the GDPR

Under the GDPR, we must have a legal ground to process your personal information. The legal grounds that we may rely on are:

- Performance of our contract with you
- Compliance with a legal obligation
- Where you have provided your consent; and
- For our legitimate interests: our main legitimate interests for processing your personal information are fraud, security, due diligence, business operations and direct marketing.

How long do you keep your information?

We required to keep some of your information for certain periods of time under law, such as the Corporations Act, the Anti-Money Laundering & Counter-Terrorism Financing Act.

We are required to keep your information for 7 years from the closure of accounts, or otherwise as required for our business operations or by applicable laws.

We may need to retain certain personal information after we cease providing you with products or services to enforce our terms, for fraud prevention, to identify, issue or resolve legal claims and/or for proper record keeping.

Use and disclosure of credit information

We will not use or disclose credit information unless the use or disclosure is permitted under the Privacy Act.

We may disclose information about you to third parties, including:

- credit reporting bodies if you are applying for credit or you have obtained credit from us.
- credit providers.
- debt collection agencies, and
- our legal representatives

As outlined above, we may disclose credit information to one or more of the following credit reporting bodies. The credit reporting bodies we use are outlined below.

Experian Australian Credit Services Pty Ltd

Phone: 1300 784 684

Mail: Level 6, 549 St Kilda Road, Melbourne, 3004

Email: creditreport@au.experian.com

Tasmanian Collection Service

Phone: 03 6213 5555

Mail: PO Box 814H, Hobart TAS 7001

Email: enquiries@tascol.com.au **Web:** www.tascol.com.au

National Collection Services

Phone: 1300 888 758

Mail: GPO Box 1635, Brisbane, QLD 4001

Email: admin@relrec.com.au

The above credit reporting body & debt collection agencies have credit reporting policies about how they deal with Your credit information. For more information, or to request a copy of their credit reporting policies, you can contact them directly.

Who do we share your personal information with

To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others. We may share your information with other organisations for any purposes for which we use your information.

Sharing Your Information

We may use and share your information with other organisations for any purpose described above.

Sharing with your representatives and referees

We may share your information with:

- your representative or any person acting on your behalf (for example, lawyers, settlement agents, accountants or real estate agents); and
- your referees, like your employer, to confirm details about you.

Sharing with third parties

We may share your information with third parties in relation to services we provide to you. Those third parties may include:

- the mortgage aggregator through whom we may submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel
- the Australian Credit Licence holder that authorises us to engage in credit activities
- referrers that referred your business to us
- valuers
- lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries
- organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct
- government or regulatory bodies (including ASIC and the Australian Taxation Office) as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities
- guarantors and prospective guarantors of your loan or lease
- service providers, agents, contractors and advisers that assist us to conduct our business for purposes including, without limitation, storing or analysing information
- any organisation that wishes to take an interest in our business or assets
- any third party to which you consent to us sharing your information.

Sharing outside of Australia

We may use overseas organisations to help conduct our business. As a result, we may need to share some of your information (including credit information) with such organisations outside Australia.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in other countries.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Where we transfer your information from the EEA' to a recipient outside the EEA we will ensure that an adequate level of protection is in place to protect your personal information such as putting in place contractual protections to ensure the security of your information.

How do you access your personal information

We always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us in writing to access your personal information that we hold. In some cases, we may be able to deal with your request over the phone.

We will give you access to your information in the form you want it where it's reasonable and practical. We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first.

We're not always required to give you access to your personal information. Some of the situations where we don't have to give you access include when:

- we believe there is a threat to life or public safety
- there is an unreasonable impact on other individuals
- the request is frivolous
- the information wouldn't be ordinarily accessible because of legal proceedings
- it would prejudice negotiations with you
- it would be unlawful
- it would jeopardise acting action against serious misconduct by you
- it would be likely to harm the activities of an enforcement body (e.g. the police); or
- it would harm the confidentiality of our commercial information.

If we can't provide your information in the way you've requested, we will tell you why in writing. If you have concerns, you can complain. See 'Contact Us'.

How do you correct your personal information

Contact us if you think there is something wrong with the information, we hold about you and we'll try to correct it if it's:

- inaccurate
- out-of-date
- incomplete
- irrelevant
- misleading

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

We will take reasonable steps to correct your credit information within 30 days from the day on which the request is made (or such longer period as you have agreed in writing).

Where necessary to resolve the correction request, we will consult other credit reporting bodies or credit providers.

We do not charge you a fee for making a request to correct information.

If we correct credit information that we have previously disclosed to a third party, we will give each recipient of the information written notice of the correction within a reasonable period, unless it is impracticable and unlawful to do so.

If we correct your credit information, we will provide you with a written notice of the correction within 5 business days.

If we refuse to correct the credit information, then we will provide you with a written notice that:

- states that the correction has not been made
- sets out the reasons for the refusal provided it is reasonable; and
- states that if you are not satisfied with the response to the request, you may access our external dispute resolution scheme or make a complaint to the Office of the Australian Information Commissioner.

Helping you manage corrections

Whether we made the mistake or someone else made it, we are required to help you ask for the information to be corrected. So, we can do this, we might need to talk to others.

Where we correct information

If we're able to correct the information, we'll let you know within five business days of deciding to do this. We'll also let the relevant third parties know as well as any others you tell us about. If there are any instances where we can't do this, then we'll let you know in writing.

Where we can't correct information

If we're unable to correct your information, we'll explain why in writing within five business days of making this decision. If you have any concerns, you can access our external dispute resolution scheme or make a complaint to the Office of the Australian Information Commissioner.

Time frame for correcting information

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that's been agreed by you.

If we can't make corrections within a 30-day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter
- ask you to agree in writing to give us more time; and
- let you know you can complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner

How do you make a complaint

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us.

You can contact us by using the details below:

Chris Brown
Lending Specialist with Coogans Choice Pty Ltd
Credit Representative No 564277
Or
Complaints Officer
Coogans Group Pty Ltd

On-line: www.coogans.au
Phone: 1300 266 426
Email: finance@coogans.au

We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days.

COOGANS

T A S M A N I A



Coogans Group Pty Ltd ABN 70 632 052 352
Australian Credit Licence 517441

Coogans Choice Pty Ltd ABN 73 681 919 308
Credit Representative Number 564277

231 Main Road Derwent Park TASMANIA 7009
1300 266 426 finance@coogans.au

Need more help

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Australian Financial Complaints Authority (AFCA):

Online: www.afca.org.au
Phone: 1800 931 678
Email: info@afca.org.au
Fax: +61 3 9613 6399
Mail: GPO Box 3, Melbourne VIC 3001

Alternatively, you may take your complaint to:

The Office of the Australian Information Commissioner (**OAIC**)

Online: www.oaic.gov.au
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Fax: 02 9284 9666
Mail: GPO Box 5218, Sydney NSW 2001

If you are in the EEA, you can contact the relevant data protection authority (for example in the place you reside or where you believe we breached your rights). For example, the Office of the UK Information Commissioner:

Office of the UK Information Commissioner
Online: www.ico.gov.uk
Phone: 0303 123 1113
Live chat: <https://ico.org.uk/global/contact-us/live-chat>

What additional things do we have to do to manage your complaints about credit information

If your complaint relates to how we handled your access and correction requests

You may take your complaint directly to our external dispute resolution scheme or the Australian Financial Complaints Authority (AFCA). You are not required to let us try to fix it first.

For all other complaints relating to credit information

If you make a complaint about things (other than an access request or correction request) in relation to your credit information, we will let you know how we will deal with it within seven days.

Ask for more time if we can't fix things in 30 days

If we can't fix things within 30 days, we'll let you know why and how long we think it will take. We will also ask you for an extension of time to fix the matter. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Letting you know about our decision

We'll let you know about our decision within 30 days or any longer agreed time frame. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Your Rights under GDPR

If you reside in the EEA, you can also:

- object to the processing of your personal information or ask us to delete or restrict or stop using your personal information. There may be circumstances where we are required to or entitled to retain or continue using your information.
- withdraw your consent to our processing of your information. We may continue to process our information if we have another legitimate ground to do so.
- ask us to send an electronic copy of your personal information, including to another organisation.

You can contact us if you wish to exercise these rights. See 'Contact Us' for more information. If we refuse any request you make in relation to this right, we will write to you to explain why and how you can make a complaint about our decision.

What if you want to interact with us anonymously or use a pseudonym

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way, however, as we are often governed by regulations that require us to know who we're dealing with. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable; or
- we are required or authorised by law or a court/tribunal order to deal with you personally.

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231 Main Road Derwent Park TASMANIA 7009
1300 266 426 finance@coogans.au

What do we do with government-related identifiers

In certain circumstances we may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.

Changes to this Privacy Policy

This Policy may change. We will let you know of any changes to this Policy by posting a notification on our website, correspondence via post or e-mail or you may contact us for a copy of the most up to date policy at any time using the information above under Contact Us.

Contact Us

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by using the details below:

Chris Brown
Lending Specialist with Coogans Choice Pty Ltd
Credit Representative No 564277
Or
Complaints Officer
Coogans Group Pty Ltd

On-line: www.coogans.au
Phone: 1300 266 426
Email: finance@coogans.au