



Privacy Statement

NB: THIS STATEMENT ONLY APPLIES TO INDIVIDUALS

We collect personal details to identify and contact you. We also collect information relating to your financial position and credit status to decide whether to deal with you.

We collect information directly from you, or through a broker, service provider, property manager or other intermediary. We may also collect information in the public domain, such as from searches of property ownership or electoral rolls. We may also with your consent obtain a credit report from a third party.

We collect information so we can process any request you make for our credit services, and to make decisions relating to providing and administering those services. We may also use your information for internal reports, research and planning, or to offer you further services.

We may use information (and may request further information from you) to carry out any identification check required under the Anti-Money Laundering & Counter-Terrorism Financing Act. In that case, we may disclose information such as your name, residential address and date of birth to a credit reporting body, and ask it to prepare and provide us with an assessment of whether that matches (in whole or part) the personal information held by it. In doing so, the credit reporting body may use personal information about yourself and others held by it, such as names, residential addresses and dates of birth.

If you do not provide us with information we request, we may be unable to accept your request for our services.

We take all reasonable steps to protect the information we hold from wrongful use or disclosure. Only authorised staff can access information, and they are bound by duties of confidentiality.

We only disclose personal information to other organisations where that is necessary as part of providing services to clients. For example, we may need to disclose information to your broker or insurers in connection with premium funding products. We may also need to disclose your information to organisations that carry out functions for us, such as auditors, computer experts, lawyers, and so on.

You have a right to access the personal information held about you, and to correct the information if it is incorrect. We accept written and verbal requests for access to information. There are some situations in which we may refuse to give access to information. If we deny access, we will explain the reason for our decision.

If you have any concerns or queries about our privacy policy, or if you would like more information about the way we handle personal information, please contact our Privacy Officer:

Privacy Officer

78a Fullarton Road NORWOOD SA 5067

Phone: 1300 137 037

Email: mailbox@principal.com.au

Website: www.principal.com.au

Privacy Policy

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1. Scope

We understand that privacy is important. This document sets out how we collect, protect and use the individual's personal information.

2. Collection

- 2.1 We only collect personal information which is necessary. We do not collect more information than is required to provide appropriate financial services to clients.
- 2.2 We collect personal details to identify and contact individuals. We also collect information relating to their financial position and credit status.
- 2.3 When collecting information over the phone, we inform the individual:
 - 2.3.1 Principal Finance is bound by the Privacy Act;
 - 2.3.2 Personal information is collected in order to provide services to our clients;
 - 2.3.3 Under the Australian Privacy Principles, individuals have a right to have access to personal information held about them.
- 2.4 When taking personal details from new clients, we ensure that we **ask** them whether they wish to be on our mailing list for newsletters (we do not assume).
- 2.5 We collect information directly from the individual where possible (ie: in preference to collection from a third party). We may also collect information from the insurance broker, service provider or property manager.

- 2.6 We seek consent to collect sensitive information (refer to 11. Sensitive Information).

We do not collect personal information from our web site using cookies or web bugs. However if an individual e-mails us using the link on our web site, we record their e-mail address and other details for the purpose of responding to their e-mail.

3. Use and Disclosure

- 3.1 We only use personal information for the purpose for which it was collected. The primary purpose of collection is to enable us to make business decisions and to enter into business transactions, and for internal business purposes, and to carry out any AML-CTF checks required by law in connection with providing a financial service.
- 3.2 We may also use personal information for related purposes which are within the reasonable expectations of the individual. This includes sending information to insurance brokers and insurers in relation to premium funding, and property managers in relation to bond funding, and vendors of equipment and finance brokers in relation to equipment finance.
- 3.3 When we send marketing material, we always give the individual the opportunity to "opt-out" of receiving future material.
- 3.4 We only use sensitive information for the primary purpose of collection or a directly related purpose.
- 3.5 We do not disclose personal information outside of the company other than in the ordinary course of providing financial services.
- 3.6 We obtain our clients' consent to use their name or photograph, or other details which identify them, in any publication or marketing material which we produce.

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4. Data Quality

- 4.1 We take steps to ensure that the information we collect is accurate, complete and up to date. For example, we ensure that names are spelt correctly at the time of collection.
- 4.2 We give individuals the opportunity to correct their personal information online via the Principal Finance website, via written request or verbally.
- 4.3 When we are informed that information is incorrect, we ensure that it is corrected or updated immediately.
- 4.4 If an individual chooses to opt-out of receiving marketing material, we ensure that their name is removed from our mailing list.

5. Data Security

- 5.1 We take steps to ensure that information is protected from misuse, loss and unauthorised access by:
 - 5.1.1 Conducting training of all personnel in matters relating to privacy of personal information during induction to Principal Finance and annually thereafter;
 - 5.1.2 Using computer passwords for access to our computer network;
 - 5.1.3 Keeping hard copy records and electronic backups secure on and off-site;
 - 5.1.4 Shredding waste paper which may include personal information
- 5.2 We destroy our files when they are no longer required. Most files are destroyed after 7 years. We only keep files if there is a legal requirement to do so;

- 5.3 Completing annual assessments and audits of IT, physical security and risk management.

6. Openness

- 6.1 We have a Privacy Statement which we make available on request to anyone who asks. (The statement is a summary of this policy)
- 6.2 We display our Privacy Statement on our website. We also display an On-line Privacy Statement which sets out our policy in relation to collection of information on our website.
- 6.3 On request, we inform individuals of the types of personal information we hold, and how we use and disclose it. All staff can answer general queries in relation to the type of information we hold. For example, "We hold names and contact details for clients and other parties, as well as other information which we require to make business decisions and enter into business transactions". If an individual wishes to have access to specific personal information refer to 7 - Access & Correction.

7. Access & Correction

- 7.1 On request, we give individuals access to information held about them. However, we will not give access in the following circumstances:
 - 7.1.1 The request for access is frivolous or vexatious.
 - 7.1.2 Providing access would have an unreasonable impact on the privacy of another individual. In this case, we may give access to parts of the information which do not identify another individual.
 - 7.1.3 Providing access would prejudice negotiations with the individual.

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- 7.1.4 The information relates to existing or anticipated legal proceedings between us and the individual, and the information would not be accessible through discovery.
 - 7.1.5 Providing access would be unlawful – or denying access is required or authorised by law. Information which is confidential will not be disclosed to anyone other than the individual concerned unless the individual consents.
 - 7.1.6 Providing access would reveal a commercially sensitive decision-making process. In this case, we will give an explanation of the information without revealing the sensitive information.
 - 7.2 We accept written and verbal requests for access. All requests are addressed by our trained personnel, who are bound by duties of confidentiality. There is no charge for making a request for access, but we may impose an administrative charge for providing access, depending on the amount of material to be copied.
 - 7.3 In general, we respond to requests for access within 14 days of receipt of the request.
 - 7.4 If we deny access, we will give a written explanation of the reason for our decision.
 - 7.5 We may require the individual to provide proof of their identity before we release information to them.
 - 7.6 If an individual establishes that personal information about them is incorrect, we will correct the information immediately.
 - 7.7 If we do not agree that information is incorrect, we may allow the individual to make a statement in relation to the information and include this statement on our file.
- 8. Identifiers**
 - 8.1 We do not use government identifiers to identify individuals. We only use identifiers (such as tax file numbers and Medicare numbers) as required in the ordinary course of our business.
 - 9. Anonymity**
 - 9.1 If appropriate, we allow individuals to remain anonymous. This is limited to general inquiries about the firm and the services it provides. If any price is quoted, we keep a record of name, address and phone number.
 - 10. Trans Border Data Flows**
 - 10.1 We do not disclose information overseas other than in the ordinary course of our business.
 - 10.2 If we do disclose information overseas in other circumstances, we will take steps to ensure that the recipient of the information will apply privacy rules similar to the Australian Privacy Principles.
 - 11. Sensitive Information**
 - 11.1 We do not collect sensitive information unless it is necessary for us to provide appropriate services to our clients.
 - 11.2 If we collect sensitive information we will ensure that the individual consents to the collection and is aware of the intended use of the information. Usually consent can be implied from the circumstances, but where possible we will obtain express consent.

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12. Identification of Clients

Due to the Privacy Act, it is necessary for us to identify that we are dealing with the client prior to divulging any personal information. The following details can be requested by our trained personnel:

- 12.1 Agreement Number
- 12.2 Full name of caller
- 12.3 Address
- 12.4 Mobile or home phone number

13. Complaints Procedure

- 13.1 All privacy related complaints should be referred to the Privacy Officer.
- 13.2 Where possible, we request the individual to provide details of their complaint in writing.
- 13.3 We acknowledge the individual's complaint in writing within 5 business days.
- 13.4 We respond to the complaint in writing within 21 days of the complaint.
- 13.5 Details of the nature of complaints (without any personally identifying details) are recorded for use in future privacy audits.
- 13.6 If you are dissatisfied with the outcome of your complaint to the Privacy Officer, you can make a complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner.
See www.oaic.gov.au

14. Contact

If you have any questions, comments or requests regarding this Privacy Policy or our processing of your information, please contact:

Privacy Officer

78a Fullarton Road NORWOOD SA 5067

Phone: 1300 137 037

Email: mailbox@principal.com.au

Website: www.principal.com.au

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