



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 may also collect further personal information about you in the course of dealing 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 social media or searches of property ownership or electoral rolls. We also collect information if we obtain a credit report about you from a credit reporting body.

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.

When we're checking your creditworthiness and at other times, we may also give information about you to credit reporting bodies. In that case, the credit reporting body may give that information to other parties, including other lenders so they can assess your creditworthiness, so it may affect your ability to get credit.

We may also use information (and may request further information from you) as required of us by law, such as 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 or representatives 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, or our bank may require information in the event of a claim relating to an incorrect or wrongful debit. 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 have access to 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

Principal Finance Pty Ltd
78a Fullarton Road
NORWOOD SA 5067
1300 137 037
mailbox@principal.com.au

Principal Finance Pty Ltd ABN 49 008 081 712, ACL 391746

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 and to appropriately administer those services.
- 2.2 We collect personal details to identify and contact individuals, such as names, addresses, emails, phone numbers and dates of birth. 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 We are 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 We collect information directly from the individual where possible (ie in preference to collection from a third party). We may also collect information through a broker, service provider, property manager or other intermediary. We may also collect information in the public domain, such as from social media or searches of property ownership or electoral rolls. We also collect information if we obtain a credit report about a client from a credit reporting body.
- 2.5 We may collect sensitive information (refer to 11. Sensitive Information).

We do not collect personal information from our website using cookies or web bugs. However if an individual e-mails us using the link on our website, 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 and administer 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.
- 3.3 We may also use personal information to check a person's identity or creditworthiness and, for that purpose, give information about the person to a credit reporting body. Or we may need to disclose personal information because our bank requires it to process any claim you make relating to an incorrect or wrongful debit.
- 3.4 We may also use information to offer a person further services. We do not ordinarily send out marketing material but, if we do, we always give the individual the opportunity to "opt-out" of receiving future material.
- 3.5 We only use sensitive information as set out in 11. Sensitive Information.
- 3.6 We do not disclose personal information outside of the company other than in the ordinary course of our business of providing financial services.
- 3.7 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 our website, and also via written request or verbally.
- 4.3 When we are informed that information is incorrect, we ensure that it is appropriately 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 initial induction and annually thereafter;
 - 5.1.2 Using computer passwords for access to our computer network;
 - 5.1.3 Keeping hard copy records and/or electronic backups secure on and off-site;
 - 5.1.4 Shredding waste paper which may include personal information;
 - 5.1.5 Completing annual assessments and audits of IT, physical security and risk management.

- 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.

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 paragraph 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, such as under AML-CTF laws. 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 may use government identifiers to identify individuals. We only use identifiers (such as passport numbers, 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 Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.
 - 11.2 We do not collect sensitive information unless it is health information collected in connection with a hardship application, or otherwise necessary for us to provide appropriate services to our clients.

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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.

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 a client has any questions, comments or requests regarding this Privacy Policy or our processing of the client's information, please contact:

Privacy Officer

Principal Finance Pty Ltd
78a Fullarton Road
NORWOOD SA 5067
1300 137 037
mailbox@principal.com.au

Statement of Notifiable Matters

NB: THIS STATEMENT ONLY APPLIES TO INDIVIDUALS

We may disclose your personal information to a credit reporting body (CRB) to assist us to assess your credit worthiness, or to assess the suitability of credit for you, or for the purposes of taking other lawful action relating to our arrangements with you.

The CRB we deal with is Equifax. Its contact details are telephone 13 8332, or via the contact page at www.equifax.com.au.

The CRB may include the information in reports to other credit providers to assist them to assess your credit worthiness.

If you fail to meet your repayment obligations to us, or commit a serious credit infringement, we may be entitled to disclose this to the CRB.

Our policy about how we manage credit related personal information is set out above. You can contact us to obtain a hard copy if you wish.

You have rights to access, and seek correction of, the information we hold about you, and also to make a complaint to us. The policy set out above contains information about how you can do so, as well as how we deal with complaints.

We are unlikely to disclose your information other than to an Australian entity, but if we do, we will do so in accordance with paragraph 10 of the policy set out above.

You also have a right to request the CRB not to use their credit reporting information for the purposes of pre-screening of direct marketing by a credit provider, and to request the CRB not to use or disclose credit reporting information about you if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

For further information on how the CRB manages credit related personal information, please see its privacy policy at its website www.equifax.com.au.

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