

Money Tolk – Privacy Policy

Who are we? ‘We’, ‘us’ and ‘our’ refer to Concept Finance Pty Ltd t/as Money Tolk Pty Ltd ABN 74 652 608 636, Australian Credit Licence 491 487 and our related businesses.

Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it for or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law.

Personal information

When we refer to **personal information**, we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also include credit information.

Credit information is information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

The kinds of personal information we may collect about you include your name, date of birth, address, account details, occupation, and any other information we made need to identify you.

If you are applying for finance, we may also collect the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses. If you apply for any insurance product through us we may also collect your health information. We will only collect health information from you with your consent.

Why we collect your personal information

We collect personal information for the purposes of assessing your application for finance and managing that finance. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organisations that provide products or services used or marketed by us. The types of organisations to which we are likely to disclose information about you include other mortgage intermediaries, lenders, valuers, lenders mortgage insurers, surveyors, accountants, credit reporting bodies, recoveries firms, debt collectors and lawyers. We may also disclose your personal information to any other organisation that may have or is considering having an interest in your finance, or in our business.

How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. We may also collect your personal information from credit reporting bodies and from finance brokers and other people such as accountants and lawyers.

Do we disclose your personal information?

We may disclose your personal information:

- to prospective funders or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres, lenders mortgage insurers, trade insurers and credit reporting bodies;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as finance brokers, lawyers, and accountants;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the Anti-Money or Laundering and Courter Terrorism Financing Act 2006 (Cth); or
- to investors, agents or advisers, or any entity that has an interest in our business; or
- to your employer, referees or identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (b) you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

Credit information

We may collect the following kinds of credit information and exchange this information with credit reporting bodies and other entities:

- credit liability information being information about your existing finance which includes the name
- of the credit provider, whether the credit provider holds an Australian Credit Licence, the type of
- finance, the day the finance is entered into, the terms and conditions of the finance, the
- maximum amount of finance available, and the day on which the finance was terminated;

- repayment history information which is information about whether you meet your repayments
- on time;
- information about the type of finance that you are applying for;
- default and payment information; and
- court proceedings information.

We exchange this credit information for the purposes of assessing your application for finance and managing that finance.

This credit information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store the credit information we hold about you.

When we obtain credit information from a credit reporting body about you, we may also seek publicly available information and information about any serious credit infringement that you may have committed.

We may disclose your credit information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

Notifiable matters

The law requires us to advise you of ‘notifiable matters’ in relation to how we may use your credit information. You may request to have these notifiable matters (and this privacy policy) provided to you in an alternative form.

We exchange your credit information with credit reporting bodies. We use the credit information that we exchange with the credit reporting body to assess your creditworthiness, assess your application for finance and managing your finance.

If you fail to meet your payment obligations in relation to any finance that we have provided or arranged, or you have committed a serious credit infringement then we may disclose this information to a credit reporting body.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. Please see the heading Access and correction to your personal and credit information, below.

Sometimes your credit information will be used by credit reporting bodies for the purposes of ‘pre-screening’ credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your credit information is not used in this way.

You may contact the credit reporting body to advise them that you believe that you may have been a victim of fraud. For a period of 21 days after the credit reporting body receives your notification the credit reporting body must not use or disclose that credit information. You can contact any of the following credit reporting bodies for more information:

- veda.com.au,
- dnb.com.au, or
- experian.com.au.

Direct marketing

We do not direct market and will not sell our clients' details.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

Access and correction to your personal and credit information

We will provide you with access to the personal and credit information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal or credit information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you, if we deny you access to the personal or credit information, we hold about you.

If any of the personal or credit information we hold about you is incorrect, inaccurate, or out of date you may request that we correct the information. If appropriate we will correct the personal information at the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal or credit information within 30 days.

We may need to consult with other finance providers or credit reporting bodies or entities as part of our investigation.

If we refuse to correct personal or credit information, we will provide you with our reasons for not correcting the information.

Using government identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business

with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

Sensitive information

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

How safe and secure is your personal information that we hold?

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification, or disclosure.

Complaints

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act and the Credit Reporting Code, you may contact our complaints officer on 02 9283 6255 or by writing to us at Suite2, Level 10, 117 York Street, Sydney NSW 2000.

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If, despite our best efforts, you believe your complaint has not been satisfactorily dealt with, you may wish to contact an External Dispute Resolution Scheme. These schemes may be able to assist you to resolve your complaint, but only after you have made use of our internal complaints handling process.

Money Talk customers are able to refer their concerns to the Credit and Investments Ombudsman (CIO) up until 31 October 2018, or the Australian Financial Complaints Authority from 1 November 2018.

The Credit and Investments Ombudsman (CIO) - up until 31 October 2018

The Credit and Investments Ombudsman (CIO) is an independent service that provides accessible, fair, and independent dispute resolution for consumers and credit providers.

Website: www.cio.org.au

Email: info@cio.org.au

Telephone: 1800 138 422

Fax: (02) 9273 8440

Address: The Credit and Investments Ombudsman, PO Box A252, Sydney South NSW 1235

The Australian Financial Complaints Authority (ACFA) - from 1 November 2018

ACFA provides fair and independent financial services complaint resolution that is free to consumers.

Website: www.afca.org.au

Email: info@acfa.org.au

Telephone: 1800 931 678

Address: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001