

# Respecting your privacy

This privacy policy applies to you if you are an individual who is a client, or a guarantor or potential guarantor of the obligations of a client, of a mortgage broker (your mortgage broker) that:

- obtains or makes use of mortgage aggregation services provided by Pennley Pty Ltd ACN 071 979 498 as trustee for the Pennley Unit Trust (Choice Aggregation Services); or
- is a credit representative or a Broker or a Loan Writer that has applied to be appointed as a credit representative (each a “Credit Representative”) of BLSSA Pty Ltd ABN 69 117 651 760 (BLSSA),

or if you give us information in relation to any product or service administered by Choice Aggregation Services or BLSSA.

We respect your personal information, and this Privacy Policy explains how we handle it. The policy covers Choice Aggregation Services and BLSSA.

In this privacy policy, “we” or “us” means either of Choice Aggregation Services or BLSSA. Each of us is a member of the National Australia Bank Group (the Group) of companies.

## What personal information do we collect and hold?

### General information

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- credit information such as details relating to credit history, credit capacity and eligibility for credit; and
- other information we think is necessary relating to the services we provide to your mortgage broker or you.

## How do we collect your personal information?

### How we collect and hold your information

We might collect your information when you make a complaint about your mortgage broker or the products or services for which your mortgage broker assisted you or its client to apply.

Also, we might collect your information if you call us or use our websites.

### How we collect your information from other sources

Sometimes we collect information about you from other sources. We do this only if it’s necessary to do so. Instances of when we may need to include where:

- your mortgage broker gives us information about you in relation to your dealings with him or her or in an application for credit or other finance facilities; or
- the financial institution, that makes products or services available to you or the person whose obligations you guarantee, gives us your information in relation to managing commissions or requests they may have of us or your mortgage broker relating to those products or services.

## What if you don’t want to provide us with your personal information?

If you don’t provide your personal information to us, we may not be able to supply services to your mortgage broker appropriately and enable them to conduct their business efficiently.

## How we collect and hold your credit information

We will collect your credit information from details given to us by you, your mortgage broker or the financial institution that makes products or services available to you or the person whose obligations you guarantee.

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

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 information we obtain directly 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 information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements of our employees;
- document storage security policies;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites.

For more information on our online security and how you can protect yourself online see <http://www.nab.com.au/personal/internet-banking/security>

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

## What happens when we no longer need your information?

We'll only keep your information for as long as we require it for our purposes. We're also required to keep some of your information for certain periods of time under law, such as the Corporations Act, for example. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

## How we use your personal information

### What are the main reasons we collect, hold and use your information?

We may use your information to:

- administer our relationship with your mortgage broker including monitoring compliance with credit law, answering requests and complaints and generally managing the services we provide; and

- answer requests made by financial institutions that make products or services available to you or the person whose obligations you guarantee.

## What are the other ways we use your information?

We may also use your personal information to:

- allow us to run our business and perform administrative and operational tasks, like:
  - training staff;
  - risk management;
  - systems development and testing, including our websites and other online channels;
  - undertaking planning, research and statistical analysis;
- preventing or investigating any fraud, crime or misconduct or any suspected fraud, crime or misconduct;
- as required by law, regulation or codes binding us;
- managing our relationships with financial institutions on our panel of financial institutions;
- investigating and dealing with suspected or actual unlawful activity; and
- for any purpose for which you have given your consent.

## 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 and Group members for any purposes for which we may use your information.

Also, we may share your information with third parties in relation to services we provide to your mortgage broker or in relation to any of the purposes described above. Those third parties may include:

- your mortgage broker or any individual or company that employs or contracts with your mortgage broker;
- in the case of the Aggregator, BLSSA as the ACL holder that authorises the Aggregator to engage in credit activities;
- referrers that referred your business to your mortgage broker;
- lenders and financial services suppliers that have made products or services available to you;
- organisations, like fraud reporting agencies or industry associations, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;
- government or regulatory bodies as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- service providers, agents, contractors and advisers that assist us to conduct our business;
- any organisation that wishes to take an interest in our business or assets; and
- any third party to which you consent to us sharing your information.

We are not likely to disclose your information to organisations overseas. However, 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

## How do you access your personal information?

### How you can generally access your information

We’ll 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 (like a copy of a phone call you may have had with us – we can put it on a disk for you). 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 taking 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?**

### **How we correct your 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; or
- 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.

## **How do you make a complaint?**

### **How do you generally 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:

Privacy Officer

Advantedge Financial Services

Level 10

101 Collins Street

Melbourne Vic 3000

Telephone: (03) 8616 1600

Email address: [Advantedge.privacyofficer@advantedge.com.au](mailto:Advantedge.privacyofficer@advantedge.com.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.

## Further Options

### **Need more help?**

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:

- **Online:** [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)
- **Phone:** 1300 363 992
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- **Fax:** +61 2 9284 9666
- **Mail:** GPO Box 5218 Sydney NSW 2001 or GPO Box 2999 Canberra ACT 2601

## **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:

Privacy Officer

Advantedge Financial Services

Level 10

101 Collins Street

Melbourne Vic 3000

Telephone: (03) 8616 1600

Email address: [Advantedge.privacyofficer@advantedge.com.au](mailto:Advantedge.privacyofficer@advantedge.com.au)

### **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 strict 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.

### **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 at [www.choiceaggregationservices.com.au/privacy](http://www.choiceaggregationservices.com.au/privacy).