

## **PRIVACY POLICY**

National Finance Connections Pty Ltd (“NFC”) (ABN 16 661 296 457) as an Aggregator & Broker is firmly committed to protecting the privacy and confidentiality of personal information. We take our obligations to handle your personal information in accordance with the requirements of the *Privacy Act 1988* seriously. This Privacy Policy sets out details about how we manage your personal information.

### **Collection and use of personal information**

We collect personal information to enable us to provide our services to you and otherwise as set out in this privacy policy. In addition, if we are required to comply with certain legislation to provide you with the products and services you choose, then collection of certain personal information will be mandatory. If you don’t want to or are unwilling to provide us with the information we need, we may be unable to provide services to you.

### **Personal information obtained & held**

We only collect and hold personal information about you, which is reasonably necessary for our functions and activities, which includes (but is not limited to) the following purposes:

providing you quality products &/or services and to improve how we operate and provide those services assessing an application for finance to ensure no financial hardship will occur because of providing a specific loan.

- arranging the finance and any related insurance.
- maintaining your contact details.
- fulfilling our legal obligations under applicable laws and rules, such as those relating to Anti-Money Laundering and Counter-Terrorism Financing.

### **Examples of personal information collected & held relating to our customers or loan applicants:**

- name, date of birth, address, telephone number, email address or other contact details.
- information that we require to identify customers or loan applicants, including as required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*, which may

include details or copies of passports, birth certificates, driver's licences, utility bills or other documentary evidence of applicants identities.

- information relevant to the financial services that we provide or have been requested to provide, including information about customers' or applicant's financial position, such as:
- details of assets and liabilities, including investments and any existing debts.
- details of income, including employment status, occupation and the name of our clients' employer.
- proof of financial position, including for example pay slips or tax statements.
- other details relevant to a finance application that we require in order to assess that application, such as family details or the number of dependants.
- credit information, including credit information contained in credit reports from Credit Reporting Bodies (CRB).
- records of our interactions with you, including by telephone, email and online
- your enquiries or complaints

Credit information is personal information that relates to credit that a person has applied for or has been provided. The credit information that we will collect from you may include your records of credit that you have applied for (including the name of the credit provider, the type of credit and the amount of credit), default information or any other information that has a bearing on your credit worthiness used to determine your eligibility for credit. Credit information also includes credit reporting information supplied to us by a credit reporting body and any information that we derive from it.

**We will collect, hold, disclose, and use your personal and credit information to:**

- assess and verify your identity and financial situation.
  - assess your credit application, or your suitability as a guarantor to a credit application.
  - provide such information to a guarantor or related applicant.
  - exchange your information with a credit reporting body.
  - disclose your information to credit providers as set out in our 'Credit Provider Schedule' to arrange credit.
  - disclose your information to our aggregation partners as set out in the Aggregation Partners section of this document.
  - disclose your information to an insurer to arrange insurance you wish to obtain.
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- obtain from, and disclose to, third parties such as your employer, landlord, real estate agent, lending institution and guarantor who are deemed as reasonably necessary to arrange finance and/or insurance; and
  - refer you to other organisations, service providers or business partners or obtain referrals from them to you.
  - We may not be able to proceed with credit assistance without the ability to collect, hold, disclose and use your personal and credit information.

Information that may be required about other third parties (e.g., your spouse, a co borrower or dependents. If so, you confirm that you have obtained the necessary consents from that third party to disclose such information to NFC and have informed the third party of the purpose for disclosure.

**We may also collect and hold sensitive information about you, including information relating to:**

- your citizenship or country of birth
- criminal records

- information where you are a politically exposed person under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006

We may collect and hold Health Information if we are assisting customers with an insurance product. We do not use or share that information for any purpose other than acquiring the product on behalf of the customer.

### **The purposes for which NFC collects, holds, uses and discloses personal information**

NFC collects, holds, uses and discloses personal information about customers or applicants in order to:

- assess a customer's suitability for a loan or financial product
- if approved, to provide finance to customers through its network of lenders
- to send customers marketing about other products and services that we think may be of interest to them.
- to respond to inquiries and complaints.
- NFC also collects, holds, uses, and discloses personal information about:
- our customers seeking finance for any worthwhile asset finance product for business or personal use or unsecured personal loans.
- individuals or brokers who NFC provides aggregation services to or brokers operating under the NFC license to manage its relationship with those persons, including to determine remuneration payable to such parties.

### **How personal information is collected, used, and disclosed**

If you are a customer seeking a loan or insurance, we will collect personal information about you directly from you or our Credit Representatives. We may also collect personal information about you from other persons, organisations and public sources as set out below.

We may use and disclose your personal information to, and collect personal information about you from:

- any business which provides information about the consumer or commercial creditworthiness of persons.
- a credit report obtained from a Credit Reporting Body. Information about your creditworthiness, credit standing, credit history or credit capacity, the status of your finances and any default by you in accordance with the Privacy Act.
- any sources disclosed in your application for finance such as employers, past and present landlords etc.
- service providers that assist in the processing of applications.
- any joint applicants, co-applicants, guarantor or proposed joint applicants, co-applicants, guarantor of the application for finance.
- referrers, suppliers of goods, insurance product providers.
- NFC's agents, contractors and external advisers.
- government authorities (e.g., tax authorities in Australia and overseas) in connection with their lawful information requests or to meet legal obligations in any relevant jurisdiction.
- NFC's related bodies corporate (together referred to as "the Related Companies") and may use this personal information for product development and research and to inform you about products and services in the future (see the section on Marketing below for more information);
- issuers of identification document via the use of third-party systems.

- intermediaries, including your agent, adviser, a dealer, a broker, a representative acting on your behalf, other Australian Financial Services Licensee or our authorised representatives, advisers and our agents.
  - mortgage insurer to assess the risk of providing mortgage insurance or to assess the risk of default.
  - accounting or finance specialists.
  - external dispute resolution service.
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- legal and other professional advisers;
  - debt collection agencies, your guarantors, organisations involved in valuing, surveying or registering a security property, or which otherwise have an interest in such property, purchasers of debt portfolios; and
  - in connection with funding financial accommodation by means of an arrangement involving securitisation, or any other proposed transfer of or proposed dealing with your loan.

**We may collect and handle information that is in the public domain, such as from:**

online forums, websites, Facebook, Twitter, YouTube, or other social media platforms (for example, if you use social media to make a complaint); or public registers (for example, those kept by the Australian Securities and Investments Commission).

**Cookies**

We may use “cookies”. A cookie allows our servers to identify and interact more effectively with you and your device(s). The cookie assists us in maintaining the continuity of your browsing session and remembering your details and preferences when you return.

Our systems record a variety of information relating to interactions with our website. This information may include the software versions used, device identifiers (e.g. IP addresses), location data (where available and not disabled by the user), dates, times, file metadata, referring website, data entered and user activity, such as links clicked.

We may automatically collect non-personal information about you such as the site from which you linked to our websites.

In some cases, third parties may use cookies and other technologies such as those described above. These technologies may be used in connection with activities like surveys, online behavioural advertising, website and usage analytics and email campaign management.

**How we hold personal information**

We use security procedures and modern technology to protect the personal information that we hold.

We store your personal information in several ways, including in physical paper files and electronic systems and devices. Much of the information we hold is stored electronically on servers. that are in company premises or in secure data centres located in Australia. Access to and use of this information within NFC is appropriately limited to protect from misuse or unlawful disclosure of the information.

**How you can access and seek correction of your information**

You can contact us to request access to the personal information that we hold about you. Subject to the provisions of the Privacy Act and the Australian Privacy Principles,, we will generally give you access to your personal information. However, there may be exclusions that apply that permit us to

not provide you with access in some circumstances. If access is denied, we will provide you with the reason why unless, having regard to the grounds for refusal, it would be unreasonable for us to do so. Where we do grant access to your information, we may charge you a fee for accessing your personal information.

You can also contact us to request that we correct personal information that we hold about you. If we are satisfied that the personal information is inaccurate, incomplete, irrelevant, or misleading then we will take reasonable steps to correct that information.

Any request to access or correct personal information should be made to NFC Privacy Officer using the contact details set out below and will be dealt with in accordance with the Privacy Act.

### **Disclosing your information overseas**

Some of the parties with which we exchange your personal information, including our service providers and other third parties, may be located outside Australia including India, Singapore and the United States of America.

We may also need to send your information overseas to process transactions you have instructed us to make, such as international money transfers. The countries to which we disclose your information will depend on the transaction details.

### **Marketing**

We may use and disclose your personal information to inform you about other products and services we think may be of interest to you in the future.

We respect your right to ask us not to use your information for direct marketing and NFC, will not send you information about products and services if you so request by contacting NFC using the contact details set out below.

### **Complaints**

If you have a complaint about the way we have dealt with your personal information or think that we have breached the Australian Privacy Principles, you may make a complaint by contacting our Privacy Officer:

Addressee: The Privacy Officer  
Phone: (08) 6200 0900

Writing: National Finance Connections Pty Limited  
PO Box 3044, East Perth 6892

Emailing: [admin@nationwisegroup.com.au](mailto:admin@nationwisegroup.com.au)

We will acknowledge and respond to complaints within a reasonable time .

If you disagree with our decision, or are dissatisfied with the response of our complaints officer you may refer your complaint to:

Australian Financial Complaints Authority Limited ABN 38 620 494 340 (AFCA), an external review scheme to which we belong, that can be contacted by writing to GPO Box 3 Melbourne VIC 3001, by phoning 1800 931 678 or lodging a dispute online at [www.afca.org.au](http://www.afca.org.au)

### **Changes to this Privacy Policy**

We are constantly developing and enhancing our use of online technologies and make reasonable efforts to ensure we keep this Privacy Policy and related documents up to date in this regard. Please check back when you return to use our online services to ensure you are familiar with our current practices.

We reserve the right to change this Privacy Policy at any time and, should this occur, the amendment will be posted on our website.

### **Contact Us**

If you have any questions regarding our privacy policy or handling of information, please contact our Privacy Officer at the details below:

Addressee: The Privacy Officer

Phone: (08) 6200 0900

Writing: National Finance Connections Pty Limited  
PO Box 3044, East Perth 6892

Emailing: [admin@nationwisegroup.com.au](mailto:admin@nationwisegroup.com.au)