

Privacy Policy

Document Management Information

Document ID Number:	31.072017
Policy Type:	Group
Target Audience:	All
Executive Risk Owner:	Director of Aquamore Credit Equity Pty Ltd ACN 609 876 940 ATF The Spring Park Unit Trust
Governance Head:	Director of Aquamore Credit Pty Ltd
Committee Endorsement:	Aquamore Management Committee (AMC)
Approval Frequency:	Annual
Effective Date:	February 2018
Last Date Approved:	August 2019

Document Purpose

This privacy policy explains how we manage your personal information.

Aquamore Credit Equity Pty Ltd ACN 143 954 670 ATF The Spring Park Unit Trust (Aquamore Finance) is committed to managing personal information in accordance with the Privacy Act 1988 (Cth) and Aquamore Finance Privacy Policy. Aquamore Finance recognises that failure to comply with privacy laws or to prevent or manage this risk would not only constitute a breach of legal and/or regulatory requirements, but would also represent a failure to abide by broader community expectations and could carry significant reputational damage, legal and regulatory action and financial loss.

Contents

PRIVACY POLICY	3
WHAT IS PERSONAL INFORMATION	3
WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?	3
PURPOSES WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION	4
HOW WE COLLECT PERSONAL INFORMATION	4
WHAT LAWS REQUIRE OR AUTHORISE US TO COLLECT PERSONAL INFORMATION?	4
HOW WE HOLD PERSONAL INFORMATION	5
HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?	5
DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS?	5
DO WE DISCLOSE PERSONAL INFORMATION FOR MARKETING?	6
DO WE COLLECT PERSONAL INFORMATION ELECTRONICALLY?	6
ACCESS TO AND CORRECTION OF PERSONAL INFORMATION	7
NOTIFIABLE DATA BREACH	7
RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS	7
YOUR RIGHTS	8
CONTACT US	8
CHANGES TO THE PRIVACY POLICY	8

PRIVACY POLICY

Aquamore Finance are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us. This policy is a component of, and supports, our Data Breach Policy.

WHAT IS PERSONAL INFORMATION

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

When you apply for our products or services we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. If you apply for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

PURPOSES WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

The main reason we collect, use, hold and disclose personal information is to provide you with products and services.

This includes:

- checking whether you are eligible for the product or service;
- assisting you where online applications are not completed;
- providing the product or service; and
- helping manage the product or service.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about products or services we think may interest you.

HOW WE COLLECT PERSONAL INFORMATION

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product or service or talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or whenever you apply for or access Aquamore Finance's products and services.

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- other Aquamore Group companies;
- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you;
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers and health care providers.

WHAT LAWS REQUIRE OR AUTHORISE US TO COLLECT PERSONAL INFORMATION?

We are required or authorised to collect:

- certain identification information about you by the
 - Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and
 - Counter-Terrorism Financing Rules Instrument 2007 (No. 1);

- your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth);
- if you have applied for credit or provide a guarantee, certain information about your financial position under the National Consumer Credit Protection Act 2009 (Cth), and if you give us a mortgage security, certain identification information under property laws in some states and territories; and
- certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth).

HOW WE HOLD PERSONAL INFORMATION

Much of the information we hold about you will be stored in Australia and owned by Aquamore Finance or external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

We may share your personal information with other companies within Aquamore Finance. We may also provide personal information about our customers to organisations outside Aquamore Finance. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- authorised representatives and credit representatives who sell products and services on our behalf;
- insurers, re-insurers and health care providers;
- payment systems operators (for example, merchants receiving card payments);
- other organisations, who jointly with us, provide products or services to you;
- other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, funds managers and portfolio service providers;
- debt collectors;
- our financial advisers, legal advisers or auditors;

- your representatives (including your legal adviser, accountant, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside Aquamore Finance where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS?

We may disclose your personal information to a recipient which is located outside Australia.

This includes:

- for international transactions, such as currency exchanges, we may need to disclose your information to the corresponding international party in order to process the transaction. The countries we disclose your information to will depend on the details of the transaction you ask us to carry out.

DO WE DISCLOSE PERSONAL INFORMATION FOR MARKETING?

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by a member of Aquamore Finance or one of its preferred suppliers. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising.

We may also disclose your personal information to companies outside Aquamore Finance who assist us to market our products and services to you.

If you don't want to receive marketing offers from us please contact us.

DO WE COLLECT PERSONAL INFORMATION ELECTRONICALLY?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question about your account. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information.

If we refuse to give you access to or to correct your personal information, we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

NOTIFIABLE DATA BREACH

Aquamore is obligated to notify individuals and the Australian Privacy Commissioner where there has been an eligible data breach causing or likely to cause serious harm to an individual or individuals. Please refer to our Data Breach Policy.

Whilst our overriding principle will be to endeavor to take all steps, we can to protect any parties impacted by a Data Breach. Aquamore will:

- Ensure timely escalation of events that could result in a Data Breach with the Managing Director of Aquamore and AML/CTF Manager.
- Move rapidly to quantify the extent of any Data Breach and identify and remediate the situation which gave rise to it;
- Take all necessary steps designed to ensure there are no other similar incidences of data compromise across the enterprise;
- Communicate the Data Breach to all impacted parties as quickly as practicable with openness and in as much detail as we can provide, including notification to third parties as required by law and/or contractual requirements;
- Take steps necessary to protect the parties impacted, including the provision of products and services as appropriate.

RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS – YOUR RIGHTS

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au www.oaic.gov.au

CONTACT US

You can contact us by

calling (02) 9258 8888

writing to us at Governor Phillip Tower, Suite 40.01, Level 40, 1 Farrer Place NSW 2000

CHANGES TO THE PRIVACY POLICY

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up-to-date version is available on www.aquamore.com.au.