

Privacy and Credit Reporting Policy

This policy sets out how Victorian Mortgage Group Pty Limited ACN 006 110 998 Credit Representative Number 398125, Crucis Pty Limited ACN 102 849 776 Australian Credit Licence Number 387666, and our related businesses (**we/us/our**) collect, use and disclose the personal information (including credit-related information) we hold about you.

Our commitment to protect your privacy

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.

We are committed to protecting your personal information by abiding by the Australian Privacy Principles (APPs), the *Privacy Act 1988* (Cth) (**Privacy Act**), the Privacy (Credit Reporting) Code 2014 (**Credit Reporting Code**) and any other relevant law.

Personal information

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

Credit-related information means:

- **Credit information**, which is information which includes your identity; the type, terms and maximum amount of credit provided to you, including when that credit was provided and when it was repaid; repayment history information, default information (including overdue payments); payment information; new arrangement information; details of any serious credit infringements; court proceedings information; personal insolvency information and publicly available information; and
- **Credit eligibility information**, which is credit reporting information supplied to us by a credit reporting body, and any information that we derive from it.

We use your credit-related information to assess your eligibility to be provided with finance. Usually, credit-related 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 may need to identify you. When you use our website or mobile applications, we may collect information about your location or activity, including IP address, telephone number and whether you have accessed third party sites, the date and time of visits, the pages that are viewed, information about the device used, and other user location information. We collect some of this information using cookies (for more information, please see our Cookie and Website Policy at www.vicgroup.com.au).

If you are applying for finance or providing a guarantee, we may also collect the ages and number of your dependants and cohabitants, the length of time you have resided at your current address, your employment details, and proof of earnings and expenses. If you apply for any insurance product through us, we may collect information about what is being insured, the beneficiaries, and your health information, including medical and lifestyle information from you or your health professionals. 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, establishing your identity, contacting you, managing our risk, and to comply with our legal obligations. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. Improvements in technology also enable organisations like ours to collect and use information to get a more integrated view of our customers. We may offer you other products and services from time to time.

How we collect your personal information

Where reasonable and practical, we will collect your personal information directly from you. We may collect information about you that is publicly available, such as from public registers or social media, or made available by third parties. We may also collect your personal information from credit reporting bodies, mortgage and finance brokers, employers, and other people such as accountants and lawyers.

Disclosing 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 our agents, contractors or external service providers to outsource certain functions, for example, statement production, debt recovery and information technology support;
- to any person who represents you, such as finance brokers, lawyers, mortgage brokers, guardians, persons holding power of attorney and accountants;
- to anyone where you have provided us consent;
- to other guarantors or borrowers (if more than one);
- to borrowers or prospective borrowers, including in relation to any credit you guarantee or propose to guarantee;
- to our auditors, insurers, re-insurers and health care providers;
- to claims related providers, such as assessors and investigators who help us with claims;
- where we are authorised to do so by law, such as under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth), or by government and law enforcement agencies or regulators;
- to investors, agents or advisers, trustees, rating agencies or any entity that has an interest in your finance or our business;
- to other financial institutions, for example to process a claim for mistaken payment;
- organisations that provide products or services used or marketed by us; or
- to your employer, former 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.

Credit-related information

We exchange credit-related information for the purposes of assessing your application for finance and managing that finance. If you propose to be a guarantor, one of our checks may involve obtaining a credit report about you.

The credit-related information we hold about you 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 this credit-related information. The cloud storage and the IT servers may be located outside Australia.

When we obtain credit eligibility 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-related information to overseas entities (including in India) that provide support functions to us. You may obtain more information about these entities by contacting us. If we disclose your credit-related information to entities that are located overseas, we ensure that appropriate data handling and security arrangements are in place.

Notifiable matters

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

We exchange your credit-related information with credit reporting bodies. We use the credit-related information that we exchange with credit reporting bodies to confirm your identity, assess your creditworthiness, assess your application for finance or your capacity to be a guarantor, and manage your finance.

The information we may exchange with credit reporting bodies includes your identification details, what type of loans you have, how much you have borrowed, whether or not you have met your loan payment obligations and if you have committed a serious credit infringement (such as fraud).

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

You have the right to request access to the credit-related information that we hold about you and make a request for us to correct that credit-related information if needed. See 'Accessing and correcting your personal and credit-related information' below for further information.

Sometimes your credit-related 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 bodies at any time to request that your credit-related information is not used in this way.

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

- Equifax Pty Limited – www.equifax.com.au;
- Illion (Australia) Pty Limited – www.illion.com.au;
- Experian Australia Credit Services Pty Limited – www.experian.com.au.

Direct marketing

We may use your personal information from time to time to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with which we are associated.

You may at any time opt out of receiving marketing information by phoning us on 03 8600 7900 or by writing to us at Level 4, 377 Little Lonsdale Street, Melbourne VIC 3000. If we are sending you direct marketing by email, you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

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 that the information we hold about you is accurate or complete.

Accessing and correcting your personal and credit-related information

We will provide you with access to the personal and credit-related information we hold about you. You may request access to any of the personal and credit-related 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-related information, for example, if the information relates to existing or anticipated legal proceedings, if your request is vexatious, or if the information is commercially sensitive.

If we deny you access to the personal or credit-related information we hold about you, we will explain why.

If any of the personal or credit-related information we hold about you is incorrect, inaccurate or out-of-date, you may request that we correct the information by phoning us on 03 8600 7900 or by writing to us at Level 4, 377 Little Lonsdale Street, Melbourne VIC 3000.

If appropriate, we will correct the personal or credit-related information at the time of your 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 your personal or credit-related 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-related 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 authorised 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.

Safety and security of your personal information

We will take a range of measures and reasonable steps to protect your personal information. Your personal information will always be stored 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 not satisfied 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 03 8600 7900.

We will acknowledge your complaint within seven days and aim to resolve the complaint as quickly as possible. We will provide you with a decision on your complaint within 30 days.

If you are not satisfied with the response of our complaints officer, you may make a complaint to the AFCA scheme, which can be contacted by phone on 1800 931 678, by email at info@afca.org.au, or in writing to GPO Box 3, Melbourne VIC 3001, or the Privacy Commissioner which can be contacted at either www.oaic.gov.au or by phone on 1300 363 992.

Further information

You may request further information about the way we manage your personal or credit-related information by contacting us on 03 8600 7900.

Changes to our privacy and credit reporting policy

We may change this policy from time to time or as the need arises. We will post any changes to this policy on our website.

You may request this policy in an alternative form by phoning us on 03 8600 7900 or by writing to us at Level 4, 377 Little Lonsdale Street, Melbourne VIC 3000.

This policy was last updated in September 2021.