

# MoneyPlace Group Privacy and Credit Reporting Policy

## 1. Introduction

MoneyPlace Group provides credit assistance in relation to consumer lending products, and acts as a delegate of a credit provider, loan servicer, and product designer.

This Privacy and Credit Reporting Policy ('Policy') applies to the MoneyPlace Group (referred to as 'MoneyPlace', 'we', 'our', 'us') and extends to, and covers, all operations and functions of the organisations that make up the MoneyPlace Group. A list of these organisations is set out at the end of this Policy.

MoneyPlace is bound by the Australian Privacy Principles ('APPs') and the Privacy Act 1988 (Cth) ('Privacy Act'). This Policy explains how we manage your personal information, including your credit information. Our handling of your credit information is subject to the credit reporting provisions of the Privacy Act and the Privacy (Credit Reporting) Act 2014 ('CR Code').

## 2. What kinds of personal information do we collect and hold?

The personal information that we collect from and about you will vary depending on the products and services that we provide to you.

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable. We may collect and hold the following kinds of personal information about you to help us provide you with a product or service:

- name, address, date of birth and contact details;
- tax file numbers;
- occupation and employment details;
- bank account details;
- drivers' licence details; or
- information from social media sources that are publicly available.

We may also collect credit information about you if you apply for credit from us. Credit information - a sub-category of personal information - is information about an individual's credit worthiness, including information about an individual's eligibility to be provided with consumer credit, or their capacity to repay consumer credit.

The types of credit information we collect includes information as to whether you have sought credit from credit providers, the type of credit you hold, the amount of credit provided to you, when the credit account was opened and closed, your repayment behaviour including whether you have defaulted on your credit repayments, details as to whether other credit providers have requested information about you

from a credit reporting body, scores relating to your credit worthiness, and publicly available information about you, including personal insolvency information from the National Personal Insolvency Index.

We may also process credit information about you to develop our own credit rating or score, which assists us in our assessment of your credit worthiness.

### **3. How do we collect your personal information?**

We generally collect most of your personal information from you, by the following methods:

- directly from applications, and other forms you complete when you wish to use our services or apply for a position with us;
- from information provided by a third party you have engaged for the purposes of your application, such as a finance broker or credit assistance provider; or
- from information disclosed to us by you on the phone, or by sending us correspondence (including letters and emails).

We may also collect information from third party sources about you without your direct involvement. For instance, we may collect personal information from publicly available sources of information, from other MoneyPlace Group companies, identity verification service providers, referrers, marketing service providers, other credit providers and from credit reporting bodies.

MoneyPlace will not collect sensitive information unless you have consented or an exemption under the APPs applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided, we may not be able to provide you with the benefit of our services, or meet your needs appropriately. MoneyPlace does not give individuals the option of dealing with us anonymously, or under a pseudonym. This is because it is impractical, and in some circumstances illegal, for MoneyPlace to deal with individuals who are not identified.

### **4. Who do we collect personal information about?**

The personal information we may collect and hold includes (but is not limited to) personal information about:

- borrowers;
- potential customers using our products and services;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.

### **5. Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)**

Before MoneyPlace provides a product or service to you, or to a person connected with you, we may (where you are an individual) be required to collect your personal information to comply with our customer identification obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AMLCTF Act).

The personal information we collect for this purpose typically includes identification information, such as name, residential address and date of birth. In some cases, we may need to collect information about the political activities and opinions of individuals to determine whether they are politically exposed persons

for the purposes of the AMLCTF Act. If we ask for this information, and you provide it to us, we will infer your consent to use and disclose the information for this purpose.

In certain circumstances, we may need to clarify and/or update the personal information we previously collected for identity verification purposes, and/or collect further information, including financial information about individuals. Where this is necessary, we will collect the information directly from you and/or from third party sources.

As a part of our AMLCTF verification processes we may need to take copies of your personal identification documents in order to verify your identity in accordance with the requirements of that Act.

We may also disclose your full name, residential address and date of birth to a credit reporting body for the purpose of providing an assessment of whether this identification information matches (wholly or in partly) personal information held by the credit reporting body. The credit reporting body may compare your details with personal information held by the body (being the names, residential address and dates of birth of other individuals) for the purposes of making this assessment.

You have the right to:

- let us know by email at [privacyofficer@moneyplace.com.au](mailto:privacyofficer@moneyplace.com.au) if you do not want us to disclose your personal information to a credit reporting body for this purpose; and
- opt for an alternative means of verifying your identity for the purposes of the AMLCTF Act.

## 6. Website collection

We collect personal information from our website [www.moneyplace.com.au](http://www.moneyplace.com.au) when we receive emails and online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous.

We may also use third party cookies, such as those provided by Google, to help us refine our marketing and messaging through online advertising.

A "cookie" is a small text file that may be placed on a computer by a web server. Our websites may use cookies that may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

## 7. Why does MoneyPlace collect and hold personal information?

We may use and disclose the information we collect about you for the following purposes:

- to identify you and verify that your information is correct
- to identify and inform you about a product or service that we think maybe of interest to you.
- to assist you to apply for a product or service;
- upon application for a product or service, to assess your credit worthiness and eligibility;
- to provide a product or service to you;

- to contact you, and manage our relationship with you;
- to discuss your application, or your product or service, with third parties you have engaged for the purpose, such as financial advisors or credit assistance providers;
- to discuss your application, or your product or service, with third parties that provide products or services related to your MoneyPlace product or service, such as providers of consumer credit insurance;
- to invite you to individual or marketing events and webinars;
- to protect our business and other clients from fraudulent or unlawful activity;
- to conduct and enhance our overall business to add more value to our customers;
- to consider and handle any concerns or complaints an individual may have;
- to comply with relevant laws, regulations and other legal obligations, including our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth); and
- to help us design and improve our products and services to be more relevant to you

## **8. How do we hold personal information?**

We take reasonable steps to ensure that the personal information we collect is protected from loss, misuse and interference, and from unauthorised access, modification or disclosure. We use a range of physical and electronic security measures, such as access restrictions, to secure the personal information we hold. We also train our employees to keep our customers' personal information confidential.

At times we engage other people to perform services for us, which may involve that person handling personal information we hold. In these situations, we prohibit that person from using personal information about you except for the specific purpose for which we supply it. We prohibit that person from using your information for the purposes of direct marketing their products or services.

We also undertake to take reasonable steps to delete all personal information about you when it is no longer needed.

## **9. To whom might we disclose personal information?**

To help us run our business and provide services to you, we may disclose personal information to:

- employees and contractors of MoneyPlace Group and its related entities;
- credit reporting bodies
- debt collectors, for the purpose of recovering payments owed to us;
- service providers, or agents that we engage to fulfil outsourced functions such as a mailing house, information systems support, debt collectors, marketing services, collections houses or other professional advisors such as our lawyers;
- credit providers, and lenders of record such as Secure Funding Pty Ltd (ACN 081 982 872) to which you can find a copy of their privacy statement at <https://www.liberty.com.au/disclosures/privacy-policy>;
- third parties you have engaged in relation to your application, or your product or service, such as financial advisors or credit assistance providers;
- third parties that provide products or services related to your loan account, such as providers of consumer credit insurance;
- third parties that provide products or services that may be of interest to you;
- organisations involved in negotiations to transfer or sell of all or part of our assets or business;
- financial institutions involved in managing payments, such as banks;
- entities within the same corporate group, including our parent company, Liberty Financial Pty Ltd ACN 077 248 983, and other entities in the same corporate group, specifically including but not limited to Secure Funding Pty Limited ACN 081 982 872 and LFI Group Pty Ltd ACN 138 903 581, where those entities assist us to provide products or services to you;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- to anyone else to whom you authorise us to disclose or is required by law.

We may also collect personal information from these organisations and individuals, and will deal with that information in accordance with this Policy.

## 10. Credit reporting – notifiable matters

When you apply to us for a credit related service, part of the assessment process means we obtain a copy of your credit report. This is to help us understand if you'll be able to meet your repayment obligations with us and support responsible lending, by not providing you credit if this will place you in financial difficulty.

A credit report contains details about your identity, the types & amount of credit you have, whether you have defaulted on your repayments, and whether you have committed a serious credit infringement. We will also ask the credit reporting body to provide an overall assessment of your credit worthiness in the form of a score.

We currently disclose information to the following credit reporting bodies:

- Equifax Australia - <https://www.equifax.com.au/privacy>
- Illion - <http://dnb.com.au/privacy-policy.html>
- Experian Australia Credit Services - <http://www.experian.com.au/credit-services-privacy>

We may obtain or disclose information regarding you to any or all of these bodies.

All credit reporting bodies have a policy to explain how they will manage your credit-related personal information. To view the policy, you can follow the link above to their website or you can contact them directly for further information.

We use information from credit reporting bodies to help verify your identity, assess any application for credit you make with us and help to manage our relationship with you. The credit reporting body to which we disclose credit information about an individual will include this information in reports that are made

available to other credit providers to assist them to assess an individual's credit worthiness.

MoneyPlace may disclose the following information about your credit facility to credit reporting bodies:

- That we provide credit to you;
- The type of credit you hold;
- The amount of credit provided to you;
- When your account is opened and closed; and
- Your repayment behaviour with us.

If you fail to make repayments on your credit or you default on your obligations, we may report this information to a credit reporting body. We will also update a credit reporting body as to payments made on time or if you have corrected a default. We may also tell a credit reporting body if we suspect you have committed a serious credit infringement (e.g. if you fraudulently obtain or attempt to obtain credit).

At the request of credit providers, credit reporting bodies can use the personal information they collect about you to pre-screen you for the purposes of direct marketing. You have the right to contact these credit reporting bodies directly to advise that you don't want your information used in pre-screening assessments. If you do this, the credit reporting body must not use your information for that purpose.

If you believe that you have been or are likely to be the victim of fraud (including identity fraud), you can request a credit reporting body not to use or disclose the credit related information they hold about you.

## **11. Do we send personal information overseas?**

We may need to send your personal information (including your credit information), to related entities or services providers of the MoneyPlace Group that are located overseas and/or who do not carry on business in Australia. The most common reason for MoneyPlace disclosing information overseas is to support us providing you with products and services and this mainly relates to technology support. Our providers are based in India, Japan, New Zealand and the United States of America. This is not a complete list of the countries to which your information may be disclosed when using a MoneyPlace product or service. For further information on the countries to which we send personal information, please contact us at [privacyofficer@moneyplace.com.au](mailto:privacyofficer@moneyplace.com.au).

If we disclose personal information to a recipient outside Australia, we will do so in compliance with applicable laws.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

## **12. Do we use or disclose your personal information for direct marketing?**

We will, from time to time, use your personal information to let you know about products and services that may be of interest. We may contact you by conducting marketing activities via telephone, email, mail, SMS, iM or other electronic means. We may also market our products to you through third party channels (such as social networking sites).

You can let us know if you no longer wish to receive direct marketing offers from MoneyPlace, and we will provide easy-to-follow ways to opt-out. We will process your request as soon as practicable.

With your consent, we may disclose your personal information to third parties who assist us in providing

marketing offers to you. You can ask us not to do this at any time.

With your consent, we may disclose your personal information to third parties who provide products or services that you have indicated an interest in. You can ask us not to do this at any time. We may receive a commission or referral payment from such third parties.

For the purpose of direct marketing, we may only use or disclose personal information if you have consented to the use or disclosure of the information for direct marketing or it is impracticable to obtain that consent.

### **13. How do we keep personal information accurate and up-to-date?**

MoneyPlace is committed to ensuring that the personal information it collects, uses and discloses is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information (including credit information) we hold about you. If we correct personal information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

### **14. How can you access the personal information we hold about you?**

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information (including credit information) that we hold about you by contacting the MoneyPlace Privacy Officer. We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

### **15. Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment. We will post our changes on our website and, if the changes are material, we will contact you to explain the purpose of the changes.

### **16. How do we resolve your concerns and/or complaints?**

MoneyPlace takes its obligations to maintaining your privacy seriously, and has an effective complaints handling process in place to manage your privacy concerns, and increase customer confidence in MoneyPlace's privacy procedures.

Your feedback is important to us, as we are continuously monitoring the effectiveness of our compliance procedures to build and protect our business and reputation.

If you have a complaint to make about the treatment of your information, please get in touch. You can make a complaint to MoneyPlace about the treatment or handling of your personal information by lodging a complaint with the Privacy Officer at [privacyofficer@moneyplace.com.au](mailto:privacyofficer@moneyplace.com.au).

We will make every effort to resolve our complaint as quickly as possible and will acknowledge receipt of

your complaint within 3 business days, and we'll let you know if we will need further information from you to resolve your complaint. We aim to resolve all within 5 days but depending on the complexity, some may take longer to resolve. We will keep you informed of our progress until it is resolved.

If you are unsatisfied with the resolution, then you can escalate this further. MoneyPlace subscribes to the Australian Financial Complaints Authority (AFCA), an external body who considers most privacy complaints of financial services providers.

AFCA can be contacted at:

**Australian Financial Complaints Authority**

GPO Box 3

Melbourne VIC 3001

Phone: 1800 931 678

[www.afca.org.au](http://www.afca.org.au)

You can also refer your complaint to the Office of the Australian Information Commissioner:

- by telephoning - 1300 363 992
- by writing to - Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- by emailing - [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 17. MoneyPlace Group organisations

Collectively or individually (as the context requires), a reference to "MoneyPlace Group" or "MoneyPlace" is a reference to:

- Money Place Australia Pty Ltd ACN 169 627 338;
- Money Place AFSL Ltd ACN 601 061 438;
- MoneyPlace Pty Ltd ACN 606 547 559;
- Money Place Assets Pty Ltd ACN 601 045 578;
- Secure Funding Pty Ltd ACN 081 982 872 as lender of record for, the MoneyPlace Loan Origination Service; and
- our parent company, Liberty Financial Pty Ltd ACN 077 248 983, and other entities in the same corporate group, specifically including but not limited to Secure Funding Pty Limited ACN 081 982 872 and LFI Group Pty Ltd ACN 138 903 581.