

# PRIVACY POLICY

Last updated - 12<sup>th</sup> July 2017



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## **Our Commitment to our Clients**

Prefix Finance recognises that it is important for clients to know how we deal with their personal information. Our obligations are set out in this Privacy Policy.

The Prefix Finance Privacy Policy is based on open and transparent management of personal information including its collection; use and disclosure; integrity, including quality and security; and access and correction.

Prefix Finance employees, credit representatives, advisers and support staff comply with the relevant provisions of the Privacy Act 1988 and the APPs.

## **Collection of personal information**

Due to the nature of the products and services provided, plus government regulations and taxation laws, it is inevitable that we will obtain personal information from you. We only collect personal information that is reasonably necessary for one or more of our functions or activities.

The type of personal information we may collect can include (but is not limited to) name, address, date of birth, address details, occupation, industry, country of residence, country of citizenship, income, assets and liabilities, account balances, tax and financial statements and employment details. We are bound by the Corporations Act to obtain complete, accurate and relevant information about you in order to provide personal advice that complies with related obligations.

We will only use your personal information for the purposes we collected it or as allowed by law.

### Solicited information

In the course of our credit advice activities we will solicit information from you, as required to conduct our business activities. Before soliciting information, we will obtain your permission to do so. This forms part of the Client Acknowledgement Terms and Conditions, and is approved by you when you sign the Client Acknowledgment form.

Details of our collection statement are provided in the Prefix Finance Credit Guide, as amended from time to time.

### Unsolicited information

Where we receive your personal information which has not been solicited by us, we will, within a reasonable period, determine whether we could have collected that information during the normal course of our credit advice

activities, or whether we could have reasonably collected that information had we requested it. If not we will destroy or de-identify that information as soon as practicable.

## Special forms of information

### Sensitive information

We may also collect personal information about you that is considered 'sensitive'. Sensitive information is a subset of personal information that is subject to a higher level of protection and includes certain types of information such as:

- health records
- racial or ethnic information
- political opinions
- criminal records
- religious beliefs
- sexual orientation, and
- membership of a political association, professional or trade association or of a trade union.
- biometric information and biometric templates

Sensitive information will only be collected with your consent and will only be used and disclosed for the purposes for which it was provided, unless use or disclosure of this information is required by law.

### Personal statements

All personal statements (electronic and / or handwritten) will be securely deleted, destroyed and / or returned (marked 'Private & Confidential') to you unless you have granted us permission to retain these. Your permission is granted in the Client Acknowledgement Form (CAF), which we retain a copy of on file.

### Tax file numbers

On some occasions we may request from you documents that contain your tax file Number (business financials, group certificates, personal tax returns, etc).

We will handle, destroy, and de-identify tax file numbers during the course of our credit activities and only retain documents that do not contain your tax file number. This may include electronic and paper based copies.

We will obtain written permission to handle your tax file number with your acceptance on the Client Acknowledgment Form. If you do not consent, we may be unable to provide you with credit assistance.

## **Access to your personal and credit information**

You may request access to any of the personal information we hold about you at any time and we will provide you with access to that information.

We may charge a fee for our costs of retrieving and supplying the information to you.

We aim to respond within 30 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 information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information. We aim to provide you with details about whether we have corrected the personal information within 30 days of receiving your request.

We may need to consult with other entities as part of our investigation.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

## **Integrity of personal information**

We will endeavour to maintain accurate and up to date details of your personal information. We may contact you from time to time to ensure the details he have are current.

There is an onus on you to ensure you advise us of any changes to your personal information, such as contact phone number or email address changes. We generally rely on you to do this to ensure our records are accurate.

We are required by law to retain information relevant to our business activities and the credit advice we provide for you. When we store your information for this reason, we take reasonable measure to minimise risk from misuse, interference and loss, and from unauthorised access, modification or disclosure. This applies to both electronic and paper based information we retain.

## **Direct marketing**

We may, from time to time, use or your personal information to communicate directly with you to promote goods and services. This may be through a variety of channels including telephone, email, SMS, mail, online, brochures, newsletters and seminar invites.

We may also use or disclose your personal information for direct marketing if we believe you would reasonably expect your personal information to be used or disclosed for direct marketing purposes, for example those clients we have an

existing relationship with. If we do this, we will provide an easy way to opt-out of receiving this material.

You can opt-out at any time by advising [compliance@prefixfinance.com.au](mailto:compliance@prefixfinance.com.au) that you no longer wish to receive specific or all marketing material. If you do so, we will no longer send you the selected material.

### **Collecting information from third parties**

If you authorise us in writing, we may gather information about you through third parties such as your real estate agent, conveyancer, accountant or lawyer. Any information collected in this way will be handled in compliance with the APPs.

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