

Privacy Statement and Consent

This privacy and consent statement contains important information about 1st Choice Enterprises Pty Ltd ACN 082 914 725 T/A '1st Choice NOW' Australian Credit Licence No 393676, our related bodies corporate, affiliates and agents (**we/us/our**) collection, use, holding and disclosure of your personal information.

By accepting this document, you consent to the collection, use and disclosure of personal information and credit-related information as set out in this Privacy Statement and Consent.

Personal information is defined in the *Privacy Act 1988* (Cth) (**Privacy Act**) as information (or opinion), in any form, about an individual (not a business, company or trust) whose identity is apparent or can be ascertained from the information held.

Personal information includes your name, date of birth, address, the number and ages of your dependants, and employment information. If you use our website or mobile applications, we may collect information that relates to your location or activity, including IP address, use of third-party sites, and other user information.

Credit-related information means both:

- **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, financial hardship information (including information that any repayments are affected by a financial hardship arrangement) and 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 bureau (**CRB**), and any information that we derive from it.

We refer to personal information and credit-related information collectively as 'information' in this document.

How we handle your information

We may also collect, store, use or disclose information about you to third parties for the purposes of assessing your application for credit and managing that credit, establishing your identity, contacting you, managing our risk, and to comply with our legal obligations

for the management of your credit contract and administrative purposes including credit scoring, securitisation, portfolio analysis, research, planning, security, and risk management;

- to protect our lawful interests; and
- to give effect to your instructions and administration of your credit contract; and

- where a third party acquires or wishes to acquire or make inquiries in relation to acquiring an interest in all or part of our company or our business.

We undertake to safeguard your information and not to use it for any other purpose not disclosed in this Privacy Statement and Consent.

In the process of assessing your application, we may exchange information about you and/or disclose your I information to third parties.

Exchange information with CRBs

We may give information about you to, and receive information about you from, CRBs, including information about your credit worthiness.

CRBs may include information about you and this application in reports provided to other lenders to assist them to assess your credit worthiness. We may inform CRBs if you default, fail to meet your repayment obligations, or commit a serious credit infringement. You can ask a CRB not to use a credit report about you for the purposes of pre-screening or direct marketing. You can also ask a CRB not to use or disclose credit reporting information about you if you have reasonable grounds to believe that you have been, or are likely to be, a victim of fraud.

The CRBs we may share information with are:

- Equifax Pty Limited – www.equifax.com.au – contact on 13 83 32; see privacy policy at <https://www.equifax.com.au/privacy>;
- TaleFin Pty Ltd - www.talefin.com – contact info@talefin.com; see privacy policy at <https://www.talefin.com/talefin-privacy-policy>

Exchange information with other businesses

We may give or receive information about you to the following types of businesses.

- other financiers or credit providers;
- finance brokers, funders, mortgage managers, and other people who assist us to provide our products or services;
- any person who represents you, including financial consultants, accountants, lawyers, mortgage brokers, persons holding power of attorney, guardians and advisers;
- industry bodies, government authorities, tribunals, and courts;
- investors, advisers, trustees, ratings agencies and other businesses assisting us with funding;
- any person where we are authorised or required to do so by law;
- businesses who provide us with services or systems;

- insurers, valuers, and debt collection agencies;
- persons who are, or are likely to be, co-borrowers with you or to guarantee your loan;
- any person to whom you expressly consent us to share information with;
- any of our related entities or associates;
- our agents, contractors or service providers that we engage to carry out our functions and activities;
- your referees and your employer;
- an organisation that assists us to identify, prevent or investigate any fraud, unlawful activity or misconduct (or suspected fraud, unlawful activity or misconduct);
- any person considering acquiring an interest in our business or assets; and
- associated businesses that may want to market products to you.

What happens if you do not consent?

You have the right to refuse to give us your information or refuse to consent to us disclosing such information to others but if you do refuse, we will not be able to process your application and it will be declined.

Access to information, complaints and privacy and credit reporting policies

We undertake to always comply with the Privacy Act 1988 as amended from time to time

You may gain access to the information we hold about you or obtain a copy of our Privacy Policy at www.1stchoiceNOW.com.au or by contacting us on 1300 552 558.

Our Privacy Policy and the privacy policies of the insurers and CRBs we deal with contain information about how you may access or seek correction of your information, see how that information is managed, how to make a privacy-related complaint, and how that complaint will be dealt with.

Privacy Policy

1. **Who we are and what this Privacy Policy is about**

This Privacy Policy sets out how 1st Choice Enterprises Pty Ltd

ABN 23 082 914 725 T/A '1st Choice NOW' Australian Credit Licence No 393676 and our related businesses ("1st Choice" or "we" or "our"). collect, use and disclose the personal information (including credit-related information) we hold about you.

In the process of assessing and providing you with credit, we may exchange your personal and credit-related information with third parties.

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

2. **What information does this Privacy Policy apply to?**

This Privacy Policy applies to your personal information, which includes your credit – related information.

Personal information is information (or opinion), in any form, about an individual (not a business, company or trust) whose identity is apparent or can be ascertained from the information held whether the information is true or not. Personal information includes your name, date of birth, address, the number and ages of your dependants, and employment information. If you use our website or mobile applications, we may collect information that relates to your location or activity, including IP address, use of third-party sites, and other user information.

The personal information we hold that relates to 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, financial hardship information (including information that any repayments are affected by a financial hardship arrangement), 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 bureau (**CRB**), and any information that we derive from it.

4. **Why do we collect your personal information?**

We collect your personal information in order to assess your application for a credit contract, managing that credit, establishing your identity, contacting you, managing our risk, and to comply

with our legal obligations. We need to assess the suitability of the credit contract to your requirements and objectives, and to assess your capacity to adhere to your financial obligations under the credit contract.

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.

5. *Our general commitment*

We undertake to collect, store, use and disclose your personal and credit-related information only in a manner which is compliant with the Privacy Act and for the purposes set out in this Privacy Policy.

6. *How we collect and disclose 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 CRBs, mortgage and finance brokers, employers, and other people such as accountants and lawyers.

We may disclose your personal information to the following types of businesses:

- other financiers or credit providers;
- finance brokers, funders, mortgage managers, and other people who assist us to provide our products or services;
- any person who represents you, including financial consultants, accountants, lawyers, mortgage brokers, persons holding power of attorney, guardians and advisers;
- industry bodies, government authorities, tribunals, and courts;
- investors, advisers, trustees, ratings agencies and other businesses assisting us with funding;
- any person where we are authorised or required to do so by law;
- businesses who provide us with services or systems;
- insurers, valuers, and debt collection agencies;
- persons who are, or are likely to be, co-borrowers with you or to guarantee your loan;
- any person to whom you expressly consent us to share information with;
- any of our related entities or associates;

- our agents, contractors or service providers that we engage to carry out our functions and activities;
- your referees and your employer;
- an organisation that assists us to identify, prevent or investigate any fraud, unlawful activity or misconduct (or suspected fraud, unlawful activity or misconduct);
- any person considering acquiring an interest in our business or assets; and
- associated businesses that may want to market products to you.

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.

7. *Credit-related information*

We exchange credit-related information for the purposes of assessing your application for finance and managing that finance.

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 are located in Australia.

When we obtain credit eligibility information from a CRB about you, we may also seek publicly available information and information about any serious credit infringement that you may have committed.

If authorised by law, we will disclose credit related information to law enforcement and government agencies.

7. *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 Privacy Policy) provided to you in an alternative form.

We exchange your credit-related information with CRBs. We use the credit-related information that we exchange with CRBs 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 CRBs 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, whether you have entered into a financial hardship arrangement (either with us or some other third party), 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 CRB.

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 CRBs for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the CRBs at any time to request that your credit-related information is not used in this way.

You may contact the CRBs 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 CRBs for more information:

- Equifax Pty Limited – www.equifax.com.au – contact on 13 83 32; see privacy policy at <https://www.equifax.com.au/privacy>; and
- TaleFin Pty Ltd - www.talefin.com – contact info@talefin.com; see privacy policy at <https://www.talefin.com/talefin-privacy-policy>;

8. Accessing and correcting to your personal and credit-related information

You have the right to seek access to any **personal or credit-related** information we hold about you.

If you want access to the personal information we hold about you, we will need to identify you and, in this process, we may ask for identifying information such as your full name, address and your driver license.

Depending on the type of request that you make we may respond to your request immediately, otherwise we will usually respond 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 contacting our privacy officer at privacy@1stchoiceNOW.com.au

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 CRBs 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.

8. Security of 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 take reasonable steps to protect any personal or credit-related information we hold against misuse, loss and unauthorised access, modification or disclosure.

If we no longer need your personal information or credit-related information, we will take steps to either destroy the information or de-identify it.

9. Direct marketing

We may, from time to time, use your personal information to provide you with information in relation to additional services and or products we offer.

Some CRBs provide a pre-screening service to financial service companies. Pre-screening is a service that identifies potential marketing opportunities and potential products and or services that you may be interested in the future. We may use the pre-screening service from time to time.

You can always opt out and advise us that you do not wish to receive direct marketing information in the future. You can do that by calling 02 8796 3850 and request to opt out from future direct marketing communication.

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.

10. Government identifiers

We do not have access to any personal information that can be regarded as or be used as an identifier. For example, we do not have access to your Medicare number or tax file number. We will not use any government identifier that was disclosed to us (such as Centrelink number) to identify you.

11. Complaints

If you have any concerns about your privacy or the personal or credit-related information we hold about you, or you are not satisfied with how we have dealt with your information, or you have a complaint about our compliance with the Privacy Act and the Credit Reporting Code you may contact us at privacy@1stchoiceNOW.com.au and we will always endeavour to address your concerns.

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 further investigation is required, we will keep you advised of the progress of the investigation and if necessary, your complaint or concern will be escalated for action to one of our Directors.

If you are not satisfied with our response, 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 Office of the Australian Information Commissioner, which can be contacted at either www.oaic.gov.au or by phone on 1300 363 992.

12. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. If we change this privacy policy, we will post changes to this Privacy Policy on our website.

13. Overseas disclosure

It is not likely that we will disclose your personal or credit-related information to overseas entities. If we disclose your personal or credit-related information to overseas entities, we will provide details on our website detailing the entities and countries where the information will be disclosed to.

If we disclose your personal or credit-related information to entities that are located overseas, we will take reasonable steps to ensure that the overseas entity does not breach the Australian Privacy Principles in relation to your credit-related information.

It is possible that a CRB may use overseas systems and processes to store your credit-related information. We will ensure that our CRB have the same compliance processes and legal obligations to secure and protect your data similar to the provisions in the Privacy Act.

14. Website

When you use our website, we may collect statistical data in relation to your use of the site. This data includes the time and date of the visit to the site, the nature of the inquiry and any documents loaded. We may record your browser type and other internet protocols as permitted.

If you disclose any personal information on the site, the information will be governed under this Privacy Policy. The use of public internet public access to our website is not without risk. If you transmit personal information via the internet, you should ensure that the transmission is secured.

15. Cookies

If you access our website, we may use Cookies for security and in order to better provide you with services. A "Cookie" is a small text file which is placed on your internet browser. We have access to the Cookie and can derive information in regard to the use of the site. You may change the settings on your browser to reject Cookies, however doing so might prevent you from accessing the secured pages on our website.

Policy Effective Date

September 2024

End of Policy