



**Freedomcorp Pty Ltd**

**ABN 28 090 164 604**

**Credit Representative Number 479 457**

### **Freedomcorp Credit Rep Privacy policy**

This Policy applies to Freedomcorp Pty Ltd. The privacy of your personal information is important to us. We are committed to respecting your right to privacy and protecting your personal information. We are bound by the National Privacy Principles in the Privacy Act 1988. Our staff are trained to respect your privacy in accordance with our standards, policies and procedures.

#### **About this Privacy Policy**

This Privacy Policy outlines how we manage your personal information. It also describes generally the sorts of personal information held and for what purposes, and how that information is collected, held, used and disclosed. Our Privacy Policy applies to all your dealings with us and our website [www.freedomcorpfinancial.com.au](http://www.freedomcorpfinancial.com.au).

We receive services to support the broking services we give you. We receive mortgage aggregation services from Purple Circle Financial Service Pty Ltd which has a broker arrangement with Beagle Finance Pty Ltd (Loankit)

Sometimes they collect personal information about customers to manage customer enquiries or complaints, commission payments or file reviews. If you want to find out how they manage your personal information, please click on the link below or visit the website:

<http://www.loankit.com.au/about-us/privacy-policy/>

If you have any questions about this, please do not hesitate to contact us.

#### **Collecting your personal information**

As a credit service provider, we are subject to certain legislative and regulatory requirements under the National Consumer Credit Protection Act 2009 and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. These require us to obtain personal information about you including (but not limited to):

- your name, contact details, date of birth;
- other contact details such as social media handles
- length of time at your current address;
- information regarding your dependants and cohabitants;
- your occupation and employment history;
- your bank accounts;
- assets and existing finance; and
- proof of earnings, expenses and identity.

If you do not provide your information to us, it may not be possible to provide you with credit assistance.

If you want to make purchases from (or through) us we will also collect your payment information. We will also collect this information if we need to make payments to you.

If you apply for employment with us we will collect information about your work history and ask your referees about you.

If you apply to become a sub-authorised Credit Representative we will collect information to enable us to assess whether you meet accepted standards for finance brokers.

#### **How your personal information is collected**

We collect personal information directly from you whenever we can, like from enquiries we make of you when you seek credit assistance from us. We may verify that information from sources referred to in the responses to those enquiries or in this Privacy Policy.

Sometimes we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- we collect information from third parties about a loan or lease in relation to which you seek our services; or
- we exchange information with your legal or financial advisers or other representatives.



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You have the right to refuse us authorisation to collect such information from a third party.

If you give us information about another person (like your co-applicant) in relation to the services we provide, we require that you let that other person know that you have provided their personal information and direct them to our website for a copy of this Privacy Policy.

### **Credit Information**

You can appoint us as your agent and authorise us to obtain your credit information (including both consumer and commercial credit reporting and eligibility information) from a credit reporting body on your behalf. You can also authorise us to use that information to assist us to provide you with credit assistance.

### **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.

### **Dealing with us anonymously**

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you make general inquiries about interest rates or current lender promotional offers.

### **Using your personal information**

We collect your personal information for the purpose of providing you with credit services such as:

- giving you information about loan/lease products or related services;
- considering whether you are eligible for a loan or lease or any related service you requested;

- recommending a suitable credit contract, an increase to your credit limit and/or that you retain your existing credit contract;
- assisting you to apply for a credit contract or an increase in your credit limit;
- recommending a suitable consumer lease or to retain your existing consumer lease;
- assisting you to apply for a consumer lease;
- to verify your identity.

We may use your personal information to tell you about other service providers, with whom we have arrangements, that supply goods or services that may be of interest to you.

We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. If you do not wish to receive information relating to other products and services please contact us at any time.

If you apply to become a sub-authorised Credit Representative or apply for employment with us we will collect information about you to assist us to decide whether to appoint you.

We collect payment information in order to process your payments.

### **Disclosing your personal information**

In order to provide you with credit services and to operate our business activities we will need to disclose your personal information to third parties. The organisations that we are likely to disclose information about you to include:

- the mortgage aggregator through whom we submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel;
- lenders and lessors;
- lender's mortgage insurers and other loan or lease intermediaries;
- anyone who represents you such as settlement agents, real estate agents, lawyers and accountants;
- valuers;
- your referees, like your employer, to confirm details about you;



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- referrers that referred your business to us;
- guarantors and prospective guarantors of your loan or lease;
- to companies that provide information and infrastructure systems to us;
- agents, contractors and external service providers;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Courter Terrorism Financing Act 2006* or in accordance with a subpoena or summons issued by a court;
- associated businesses that may want to market products to you;
- to anyone, where you have provided us consent.

When we collect government identifiers, such as your tax file number, we do not use or disclose this information other than as required by law. We will never use a government identifier to identify you.

We may also disclose your personal information to any other organisation that may have or is considering having an interest in our business. For example, a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer of all or part of the assets of our business. Disclosure will be made in confidence and it will be a condition that no personal information will be used or disclosed by them.

We may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

Where your personal information is disclosed we will seek to ensure that the information is held, used or disclosed consistently with the National Privacy Principles.

### **Keeping your personal information accurate and up-to-date**

We aim to make sure that the personal information we collect, use or disclose is accurate, complete

and up-to-date. We will take reasonable steps to make sure this is the case. This way we can provide you with better service. If you believe your personal information is not accurate, complete or up to date, please contact us. If we refuse to correct your personal information we will provide you with our reasons within 30 days.

### **Protecting your personal information**

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse and loss and unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements for our employees, contractors and external service providers;
- complying with Licensee standards and rules for document storage and systems access;
- security measures to ensure the physical security of personal information held on our premises and systems; and
- deleting, de-identifying or destroying your personal information when records are no longer required.

We may use cloud storage to store personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

### **Your privacy on the Internet**

#### *Our Website*

We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption. User identifiers, passwords or other access codes may also be used to control access to your personal information.

#### *Links to Other Sites*

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or



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review those websites directly to ascertain their privacy standards, policies and procedures.

### *Cookies*

We use cookies on our website. Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time.

### **Gaining access to your personal information**

You can gain access to your personal information. This is subject to some exceptions allowed by law.

We may refuse to provide you with access, such as where the information relates to existing or anticipated legal proceedings, if the request is vexatious or if the information is commercially sensitive. If access is refused, we will give you a notice explaining our decision to the extent practicable and your options to make a complaint.

We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information.

We will provide you access within 30 days if it is reasonable and practicable to do so, but in some circumstances it may take longer (for example, if we need to contact other entities to properly investigate your request).

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

### **Resolving your privacy concerns**

If you have any issues you wish to raise with us or would like to discuss any issues about our Privacy

Policy, please contact our Privacy Officer. Our Privacy Officer will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing within 30 days of the determination of our Privacy Officer. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

### **Contacting Us**

#### **Privacy Officer**

**Ingrid Tait**

**Address: T2 21 Northwood Street  
West Leederville WA 6007**

**Phone: 08 9300 4477**

**Email: [Ingrid@freedomcorp.com.au](mailto:Ingrid@freedomcorp.com.au)**

**Website: [www.freedomcorp.com.au](http://www.freedomcorp.com.au)**

### **Updates**

We may review and amend this Privacy Policy from time to time to address changes to laws and to reflect our current operations and practices. You can obtain a copy of the current version on request.