

# PRIVACY AND CREDIT REPORTING POLICY

## Our Commitment to Protect Your Privacy

Platinum Mortgage Securities Pty Ltd ACN 104 911 159 and its affiliates (collectively known as “Platinum Mortgage Securities” and also referred to in this Policy as “us,” “we” and “our”) are committed to protecting your personal information. This document sets out our Privacy and Credit Reporting Policy commitment in respect of personal information that you may provide to us. Our commitment in respect of personal information is to adhere to the Privacy Act 1988 (Cth) and any other relevant law.

We confirm that any personal information we collect about you will only be used for the purposes indicated in our policy, where we have your consent to do so, or as otherwise required or authorised by law. It is important to us that you are confident that any personal information we collect from you or that is received by us will be treated with appropriate respect ensuring protection of your personal information.

Adherence to this Policy will be monitored to ensure that personal information is secured adequately and breaches, both suspected and actual, are treated appropriately as per the guidelines set by the Office of the Australian Information Commissioner (OAIC).

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## Platinum Mortgage Securities

Platinum Mortgage Securities offers financial products and services and provides credit to approved applicants. We process and assess information in respect of loan applications. We act as servicer of loan portfolios operated by investment funds and we also process and assess information when investors invest funds with us.

## Personal Information

When we refer to personal information, we mean information or an opinion about you, from which you are, or may reasonably be, identified. This information may include (but is not limited to) your name, date of birth, driver's licence number, marital status, phone number, email address, address, nationality, employment history, income, assets, liabilities and repayment history information.

Due to the nature of the services provided by us, some of the information we collect may be sensitive information. It is not common practice for us to collect other sensitive information about you (such as information about your religion, trade union membership, political opinion, sexual preference or criminal record). We will only collect sensitive information about you with your consent.

Personal information also includes credit-related personal information. Credit-related personal information means:

- Credit information is personal information or an opinion about you that has a bearing on credit that has been provided to you or that you have applied for. This information includes your identity; the type, terms and maximum amount of credit provided to you (for domestic, household or personal purposes as well as information about you where you are a guarantor of a loan), 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.

## Why We Collect Your Personal Information

We collect and receive personal information about you in order to conduct our business, including assessing and obtaining approval for loans and other products, or accrediting you as a broker or introducer of loans and other products (if applicable) and accepting investments. From time to time we may offer other products and services.

We also collect and use personal information (including credit information) about you if we are assessing whether to make a loan to a borrower where you have

offered to act as guarantor. If you are applying for a loan or provide 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.

### **How We Collect Your Personal Information**

Personal information may be collected by us in a number of circumstances, including when an individual:

- makes an enquiry with us via email or telephone;
- lodges a loan enquiry or requests a quote through our website;
- applies to invest in a product offered by us;
- applies to be a borrower or guarantor under a loan product offered by us;
- subscribes to our newsletter or product update mail outs;
- applies for employment with us; or
- applies for accreditation as a broker or introducer of loans or other products.

Where reasonable and practical we will collect your personal information only directly from you. However, we will also collect information about you from third parties such as from our contractors who supply services to us, through our referrers (such as mortgage originators and brokers), from a publicly maintained record or from other individuals or companies as authorised by you. From time to time we may also purchase lists containing personal information about individuals from organisations offering such lists for marketing purposes.

If you do not provide the information requested by us, we may not be able to provide you with our services.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described in this Privacy and Credit Reporting Policy. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this policy. The individual must also provide the consents set out in this policy in respect of how we will deal with their personal information.

We may also collect credit-related personal information about you as a result of credit checks that you authorise us to carry out.

The kinds of credit-related personal information we may collect about you include information about:

- your identity;
- consumer/commercial credit loans that you currently have applied for including repayment history information, and the type and amount of credit sought in each application;
- defaults and payments;
- any court proceedings; and
- your personal insolvency.

### **How We Use Your Personal Information**

We use your personal information for the purpose for which it has been provided, for reasonably related secondary purposes, any other purpose you have consented to and any other purpose permitted under the Privacy Act. This may include using your personal information for the following purposes:

- to provide you with the products or services you requested;
- to verify your identity;
- to assess, process and manage your application to be a borrower or guarantor, or investor, including to verify your details and assess our risk;
- to assess, process and manage your application for employment;
- for complaints handling or data analytics purposes; or
- to assess, process and manage your application to be a broker or introducer of loans or other products, including to verify your details and assess our risk.

In particular, when assessing an application to be a borrower or guarantor we may use your credit-related personal information for the purposes of assessing the application.

### **To Whom We Disclose Your Personal Information**

To enable us to maintain a successful business relationship with you, we may disclose your personal information to:

- to organisations that provide products or services used or marketed by us, including other credit providers, mortgage intermediaries (such as mortgage brokers, mortgage originators and mortgage managers), funders, lenders, valuers, trustee companies, financial institutions and securitisers, mortgage

insurers, title insurers, surveyors, credit reporting agencies, rating agencies and debt collectors;

- to your employer/s or referees, your guarantors, your professional advisors, your bank and any other organisation that may have or is considering having an interest in your loan, or in our business;
- to other guarantors or borrowers (if more than one);
- to companies and contractors who we retain to provide services for us, such as IT contractors, call centres, stationery printing houses, mail houses, storage facilities, lawyers, accountants and auditors, who will need to have access to your personal information to provide those services;
- to anybody who represents you, such as finance brokers, lawyers, mortgage brokers, guardians, persons holding power of attorney and accountants;
- where we are authorised to do so by law, such as under the Anti- Money Laundering and Counter Terrorism Financing Act 2006 (Cth) in Australia;
- to people considering acquiring an interest in our business or assets;
- to other financial institutions, for example to process a claim for mistaken payment;
- to associated businesses that may want to market products to you; and
- to anyone, both individual and corporate, where you have provided consent.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case by case basis.

Sometimes we are required or authorised by law to disclose your personal information. Circumstances in which we may disclose your personal information would be to a Court, Tribunal or law enforcement agency in response to a request or in response to a subpoena or to the Australian Taxation Office.

We may from time to time transfer personal information outside Australia in accordance with the Privacy Act to countries whose privacy laws do not provide the same level of protection as Australia's privacy laws. For example, we may transfer your personal information to the Asia-Pacific, European Union or the United States of America. We may also use cloud storage and IT servers that are located offshore.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and, when permitted by law to do so, on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian privacy laws in relation to your information.

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

The credit reporting body may provide the information that we report about you to other credit providers to assist them to assess your credit worthiness. We may also obtain information that other credit providers have provided to the credit reporting body to use in our assessments of your credit-worthiness.

The information we can exchange 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 loan that we have provided to you, or any loan that we have arranged for you, or if you commit a serious credit infringement, we may disclose this to the credit reporting body.

You may access the credit information that we hold about you. Please refer to the section titled 'Accessing your Personal Information' below. You may also request that we correct any credit information that we hold about you if you believe the information is out-of-date, incomplete, or incorrect. Please refer to the section titled 'Updating your Personal Information' below.

The information that we provide to a credit reporting body may sometimes be used for 'pre-screening' of direct marketing offers to be made by another credit provider. You may contact the credit reporting body to request that your credit information is not used in this way.

You may also contact the credit reporting body to request that they not use or disclose the credit-reporting information they hold about you if you consider that you may have been a victim of fraud or if you believe on reasonable grounds that the information they hold about you is out-of-date, incomplete or incorrect.

For further information, contact the following credit reporting bodies at:

- [www.equifax.com.au](http://www.equifax.com.au)
- [www.saiglobal.com/](http://www.saiglobal.com/)
- [www.experian.com.au](http://www.experian.com.au)

### **Information from Third Parties**

Our website may contain links to the websites of Third Party providers of goods and services (Third Party websites). If you have accessed Third Party websites through our website and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties.

Where you access a Third Party website from our website, cookie information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

### **Advertising and Tracking**

When you view our advertisements on a Third Party website, the advertising company uses 'cookies' and in some cases 'web beacons' to collect information such as:

- the server your computer is logged onto;
- your browser type;
- the date and time of your visit; and
- the performance of their marketing efforts.

When you access our website after viewing one of our advertisements on a Third Party website, the advertising company collects information on how you utilise our website (e.g. which pages you view) and whether you complete an online application.

### **Use of Cookies**

We use 'cookies' to provide you with better and more customised service and with a more effective website.

A 'cookie' is a small text file placed on your computer by our web page server. A cookie can later be retrieved by our webpage servers. Cookies 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 internet browser.

We use cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise our website and offers for you;
- for statistical purposes;
- to identify if you have accessed a Third Party website; and
- for security purposes.

### **IP Addresses**

Your IP address is the identifier for your computer when you are using the internet. It may be necessary for us to collect your IP address for your interaction with various parts of our website.

### **Online Applications and Enquiries**

When you send a completed online application or enquiry to us, we retain the information contained in that application or enquiry. We are able to then use that information to provide any services that you require.

### **Direct Marketing**

From time to time we may use your personal information to provide you with current information about mortgage loans, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with. By providing us with your personal information, you consent to us using your information to contact you on an ongoing basis for this purpose, including by mail, email, SMS, social media and telephone.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting our Privacy Contacts using the contact details below. 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 our relationship that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we will ask you to inform us if any of your personal information has changed.

If you consider that any information we hold about you is incorrect, you should contact us to have it updated. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

## **Access to Your Personal Information**

We will provide you with access to the personal information we hold about you, subject to limited exceptions in the relevant Privacy legislation as outlined below. You may request access to any of the personal information we hold about you, including any credit-related personal information we hold about you, at any time.

To access personal information that we hold about you, use the contact details specified below. We may charge a fee for our reasonable costs in retrieving and supplying the information to you. If appropriate we will correct the personal information at the time of the 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 the 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.

## **Denied Access to Personal Information**

There may be situations where we are not required to provide you with access to your personal information. For example, such a situation would be information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious. An explanation will be provided to you if we deny you access to your personal information we hold.

## **Exceptions to 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. Such a situation would be where you make general inquiries about interest rates or current promotional offers.

## **Using Government Identifiers**

If we collect government identifiers, such as your tax file number or IRD number, we will not use or disclose this information other than authorised by law. We will never use a government identifier in order to identify you.

## **Safety and Secure of Personal Information that We Hold**

We will take reasonable steps to protect your personal information, including your credit-related personal information, by storing it in a secure environment, and when the information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified.

We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

## **Further Information and Complaints**

You may request further information about the way we manage your personal information or lodge a complaint by contacting our Privacy Officer(s) on the contact details below.

We will deal with any complaint by investigating the complaint and providing a response to the complainant within 15 business days, provided that we have all necessary information and have completed any investigation required. In cases where further information, assessment or investigation is required, we will seek to agree alternative time frames with you.

## Contact Details

You can contact us by calling us on 1300 135 965 or by writing to:

**The Privacy Officer**  
**Platinum Mortgage Securities Pty Ltd**  
**Level 1, 1 Prowse Street**  
**West Perth WA 6005**  
Email: [compliance@platinumsecurities.com.au](mailto:compliance@platinumsecurities.com.au)

## Changes in our Privacy and Credit Reporting Policy

We are constantly reviewing all of our policies and we attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market practices. As a consequence, we may change this Privacy and Credit Reporting Policy from time to time or as the need arises.

**This Privacy and Credit Reporting Policy was last updated on 15 June 2020.**