COMMERCIAL EQUITY GROUP PTY LTD
PRIVACY & CREDIT REPORTING POLICY

Commercial Equity Group Pty Ltd, ABN 67 009 509 077 (‘we’, ‘us’, ‘our’) is committed to protecting your privacy and the confidentiality of your personal and credit information (information). In handling your credit information, we are bound by, and comply with, the *Privacy Act 1988* (Cth), the Australian Privacy Principles (APPs) and the Credit Reporting Privacy Code (CR Code).

This privacy policy sets out how we collect, handle and manage your information, how you can access and correct that information if you wish, and how you can complain if you are not satisfied with our policies, processes, or handling of your data.

1. Collection and Storage of Personal Information

We collect information from, and about, you to, as appropriate:

- respond to your enquiries about finance products we can source for you;
- confirm your identity;
- assess your credit application and provide you with the finance you require from us;
- assess the application for finance made by a company of which you are, or were, a director;
- assess your application to guarantee the repayment of finance we are considering providing;
- provide customer support;
- promote our finance products;
- manage any complaints; and
- manage any business arrangements under which we provide or receive goods or services.

We also use the information we collect to:

- manage your account;
- develop new products, policies and procedures;
- undertake market research;
- obtain legal and compliance advice about our obligations; and
- meet our regulatory and legal obligations.

The information we collect may include personal identification details, contact details, financial information, lending and default history, banking details and transactions, personal and trade references, and employment or business history, depending on the relationship you wish to have with us.

Consequences of Non-Provision: Providing your personal and credit information is voluntary; however, if you choose not to provide the requested details, we will be unable to confirm your identity, assess your or your company’s credit application, provide finance facilities, or manage your account.

Sensitive Information & Electronic Verification: We do not generally collect sensitive information (such as health data or criminal records) unless required by law or strictly necessary for your application. Where we verify your identity electronically using document verification services or biometric matching, we will obtain your explicit consent prior to collecting or processing such sensitive data.

Wherever possible, we will collect your information directly from you, or from your broker, should you wish to apply for finance. We may obtain personal information about you from a third party, such as your accountant or banking institution, or a credit reporting body, for a particular purpose. Wherever possible we will tell you who we need to contact and why. However, if you are, or were, a director of a company applying to us for finance, we will collect information about you sourced from publicly available official corporate records and, if a current director, from a credit reporting body.

We may also collect information from you if you choose to use our website to communicate with us. We will collect the information you provide when you fill out a product or service application form, over the telephone, or through our interactive facilities (such as customer enquiry or comment forms).

In some circumstances, brokers, dealers, accountants, banking institutions, referees, external dispute resolution schemes, your agents and government bodies, and with your authorisation at the time, a banking transaction data service, may provide us with your information. The circumstances in which third parties provide us with information include purchase or service requirements, employment or finance applications, account management and complaints.

We may store or process your personal and credit information using cloud computing services and other hosted technology platforms. These providers may store, back up, replicate, support or otherwise process the information on our behalf. We remain responsible for managing the information in accordance with applicable Australian privacy laws.

We take reasonable technical and organisational measures to protect the information we hold, including information stored or processed in cloud services, from misuse, interference, loss and unauthorised access, modification or disclosure. Depending on the nature and sensitivity of the information, these measures may include access controls, authentication, encryption, logging and monitoring, staff training, security assessments, incident response arrangements and contractual requirements for service providers.

The law (including statutory record-keeping under corporations and anti-money laundering legislation) may require us to retain your personal information for a period after our business dealings have ended. We retain information only for as long as it is required for a permitted purpose or by law. When it is no longer required, we take reasonable steps to destroy it or ensure that it is de-identified, including information held in cloud systems, backups and by service providers, subject to technical and legal limitations that may apply to backup deletion cycles.

2. Website Information Collection

When you visit our website, our ISP host records a range of information, including your server address, domain name, the date and time of the visit and the pages viewed. This information may be collected by using cookies, which is data sent to your web browser. This allows our site to interact more efficiently with your computer. If you disable the use of cookies, your use of our site may be affected.

Information collected about your visit to our site is retained for statistical and website development reasons and is not in a form which would enable us to identify you. When visiting our site, you will not be required to provide us with any personal information unless you request information about our finance or respond to a promotion. If you do, we will ask you to provide contact details along with other information required to respond to your contact with us.

We may also retain information provided for product planning purposes. It may also be used for direct marketing purposes unless you tell us you do not wish to receive marketing material. All direct marketing electronic messages sent by us will contain a clear, functional opt-out (unsubscribe) facility in compliance with the *Spam Act 2003* (Cth).

3. Use and Disclosure

We use your information to provide you, or a company of which you are a director, with the finance required, consider your suitability to be a guarantor and perform other functions and activities associated with managing our relationship.

Those functions and activities can include our internal administration, credit assessment, account management, product or service development, compliance audits/reviews, marketing, complaints management, planning and research requirements as well as future offers of finance to you.

Where you, as an individual, apply for finance with us, or agree to act as a guarantor, you authorise how we may collect, use and disclose your personal and credit information in the Privacy Statement and Consent we ask you to sign before we consider your application for credit or to be a guarantor.

We will disclose your information to third parties only as the Privacy Act permits and where there is a valid reason to do so. All third parties must use your information only for the specific purpose for which we supply it.

Third parties may include:

- Employees, contractors, auditors and advisers;
- Credit reporting bodies (CRBs);
- Service providers, including cloud computing, data hosting, software, information technology support, document custody, mailing and identity verification providers, where reasonably required to provide their services to us, including overseas providers where information is accessed, processed or stored outside Australia;
- Your agents, including your broker, where required;
- Insurers, insurance brokers and insurance assessors;
- Debt collection agencies;
- Referees, where authorised;
- Companies to which we are related; and
- Government authorities and law enforcement agencies, as required by law only.

We may also provide your information to, and receive your information from, **Equifax Australia Information Services & Solutions Ltd**, which is a credit reporting body (the CRB). We may:

- Disclose your information to the CRB for credit assessment or collections purposes;
- Use information provided by the CRB for credit assessment or collections purposes, including:
  - Your name, address and date of birth;
  - Current and previous credit account history;
  - Your personal or business credit score, depending on the nature of the credit application;
  - Default history;
  - Any court proceedings – summons, judgment and Bankruptcy actions;
  - Serious credit infringements history, covering fraudulently obtaining, or attempting to obtain finance or shown an intention to avoid repayment obligations;

- Notify the CRB of any overdue payments, provided they are more than 60 days overdue, we have attempted to collect the payment and we have notified you of our intention to do so;
- Notify the CRB of a serious credit infringement if we have reasonable grounds to believe you fraudulently obtained, or attempted to obtain, credit from us or that you have shown an intention to evade your obligations under the contract with us (we will only do this if we have not been able to contact you over a 6-month period); and
- Ask the CRB to assess your eligibility to receive direct marketing material from us.

Any information shared with, or by, the CRB is held in electronic form, trackable through the CRB or our systems by time, date, account and user.

In addition, we may provide your identification details to the CRB and/or another service provider to check those details with a document issuer or official record holder via third party systems to confirm your identity, and assist in our compliance with Australia's Anti-Money Laundering and Counter-Terrorism Financing laws (*AML/CTF Act 2006*).

Overseas Disclosures: Where information is provided to our service providers located overseas (countries include, but are not limited to: the USA, Chile, the Philippines, India, Costa Rica and Ireland), we take reasonable steps to require them to comply with our information management policies and the APPs. We remain accountable under Australian legal standards for how your information is handled by these external entities.

Important Statutory Rights Regarding Credit Reporting Information:

- **Victim of Fraud Bans:** If you reasonably believe that you have been, or are likely to be, a victim of fraud (including identity fraud), you have the right to request that a CRB not use or disclose any credit reporting information held about you for a minimum 21-day "ban period" without your written authorisation.
- **Direct Marketing Pre-screening Opt-out:** You have the right to request that a CRB not use your credit reporting information for the purpose of pre-screening for direct marketing by a credit provider.

4. Information Access and Correction

You can access the personal and/or credit information we hold about you by contacting us in any of the ways shown in Section 6 below.

You can also access the information the CRB holds about you by contacting them directly:

Equifax Australia Information Services & Solutions Ltd
Online: www.equifax.com.au/understanding-your-credit-file
Postal: PO Box 964, North Sydney NSW 2059

Access & Correction Procedures:

- **Request Handling & Timelines:** We will acknowledge your request for access to or correction of your personal or credit information promptly and aim to respond within 30 days.
- **Fees:** We do not charge a fee for lodging an access or correction request. While we generally do not charge for providing access to personal information, we reserve the right to charge a reasonable administrative fee for complex or resource-intensive requests where permitted by law.
- **Correction & Refusal:** If any information is incorrect, out of date or incomplete, you have the right to have that information updated and corrected. If we refuse your request for access or correction, we will provide you with a written notice setting out the legal

reasons for the refusal, how you can lodge a complaint about the refusal, and the relevant dispute resolution mechanisms available to you.

5. Complaints and Concerns

Please contact us if you have any complaints or queries about how we manage your information or if you no longer wish to receive marketing materials. You can contact us by mail, phone or email, as listed in Section 6 below.

If you lodge a complaint, our Internal Dispute Resolution Team will investigate your complaint. We will commence the investigation within 2 business days and provide you with a response within 14 business days. We will seek your agreement to a longer time if it is needed. We will keep you informed of the investigation process by phone or email at least once a week and provide you with a written response to your complaint within 30 days.

If you do not accept our response, you may take the complaint to our External Dispute Resolution Scheme:

Australian Financial Complaints Authority (AFCA)
Online: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678 (free call)
Mail: Australian Financial Complaints Authority, GPO Box 3, Melbourne, VIC 3001

6. Obtaining Our Privacy Policy & Contact Details

This privacy policy may change over time. You can obtain the current version from our website or by contacting us by any of the contact methods below.

Contact Channel	Details
Email	admin@cegfinance.com.au
Postal Address	Privacy Manager, Commercial Equity Group Pty Ltd PO Box 1474, Launceston TAS 7250
Physical Address	Level 1, 6 The Quadrant Mall, Launceston TAS 7250
Phone	03 6334 1288
Website	www.commercialequity.com.au