



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

specified on the file;

- unsolicited information that we may deem relevant to keep on file; and
- other relevant information in the circumstances.

We collect this information as required in accordance with:

- Sections 128-131 of the *Consumer Credit Protection Act 2009 (Cth) (NCCP)*, to assist in protecting you against identity theft and to assist in reducing the opportunity for fraud (identification information);
- Section 88 of the NCCP, Regulation 86 of the *National Consumer Credit Protection Regulations 2010* and Section 6Q of the *Privacy Act* (overdue and default information);

We collect credit information from you; the documentation we request and you provide; credit reporting bodies (such as, Equifax); people or organisations you permit us to contact, to verify your credit relevant details; other credit providers; the External Dispute Resolution scheme (AFCA); from information about you publicly available, including court and tribunal reports and decisions. Please note, depending on circumstances, we may choose not to seek information from any of the abovementioned sources to assess your credit application.

3. Use of Your Personal Information

Upon providing us with information, we may use this information to contact you via email, phone, SMS or social media so as to provide you with promotional offers. We may use your personal data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. This information will be provided to you by Francom Group upon you requesting this information from us. The information is requested by you when you tick the opt-in box or by implying to us that you consent to us sending you the information by the method in which you supply us with the information or by the type of request made to us by you.

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (for example, IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Francom Group reserve the right to use and store information about your location if you give us permission to do so ("Location Data"). Francom Group use Location Data to provide features of the Service, to improve and customise the Service. You may choose to enable or disable location services when you use our Service at any time, through your own device settings.

The purposes for which we collect, hold, use and disclose credit information and credit eligibility information

The consumer credit-related purposes for which we collect, hold, use and disclose information are:

- to assess your application to us for consumer credit; and
- to collect payments that are overdue in relation to consumer credit we may have provided you; and
- to collect payments that are overdue in relation to consumer credit provided by another credit provider, under a credit contract that has been assigned to us by that other credit provider [in



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

accordance with Subsections 6K(2) and (3) of the *Privacy Act*].

In accordance with section 21M of the *Privacy Act*, we will disclose relevant and permitted information to debt collection agents. In accordance with Section 21G of the *Privacy Act*, we use credit eligibility information for the following purposes:

- credit related purposes involving you;
- permitted reporting of information to a credit reporting body;
- in connection with what we reasonably believe is a serious credit infringement that you may have committed;
- for a use prescribed by a court, or tribunal, or regulations.

We will disclose this information to:

- credit bodies;
- a Related Body Corporate of any of the entities of Francom Group;
- a person responsible for processing your credit application;
- a person who manages our credit contracts;
- another credit provider, if we reasonably believe that you have committed a serious credit infringement; or
- the Australian Financial Complaints Authority (**AFCA**);
- as authorised under Australian law, regulation, court or tribunal.

In accordance with Section 21N of the *Privacy Act*, we may disclose information to an approved entity seeking participation in an assignment of your debt, or purchase of our business. Should the transaction proceed, you will be informed in writing, in accordance with Obligation 13 in the *Credit Reporting Privacy Code* and all our rights will be transferred to the acquirer, in accordance with Section 6K of the *Privacy Act*.

How you may access credit eligibility information that we hold about you

Please email us directly at info@francomgroup.com.au. In accordance with Section 21T of the *Privacy Act* and Code Obligation 19 of the *Credit Reporting Privacy Code*, at your request, we will:

- give you access to any credit information we hold about you;
- respond to your request within a reasonable period and provide the access within 30 days of your request;
- provide the information in a clear manner and provide reasonable explanations and summaries of the information, to assist you to understand the impact of the information; and
- deny access, only if such would be unlawful, required under Australian law, or by a court or tribunal, or would prejudice an official enforcement body investigation.

If you are not satisfied with the explanations provided, you may make a dispute via our internal disputes resolution process, AFCA and the Office of the Australian Information Commission.

4. Opt-out

We will provide you the opportunity to 'opt-out' of having your personally identifiable information used for receiving promotional offers, when we ask for this information. You may also "opt-out" of receiving our promotional offers by clicking the unsubscribe link or following the instructions included in each



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

communication by us or by contacting us.

You will be notified when your personally identifiable information is collected by any third-party that is not our agent/service provider, so that you can make an informed choice as to whether or not to share your information with that third-party.

5. Tracking & Cookies Date

We use "cookies" and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are web beacons, tags, and scripts to collect and track information and to improve and analyse our Service. The information that may be tracked and collected may include information concerning any or all of the following:

- The date and time of your visit;
- Your IP address;
- The pages you viewed;
- The completion of any online applications, forms, or questionnaires;
- Marketing campaign information;
- The server your computer is logged onto; and
- The type of browser you use.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

6. Access to Personal Information

You may request to update, delete or access your personal information by contacting our privacy officer. You may be required to verify your identity, or we may require you to provide us with additional information about your request. Should we be permitted by law, we may refuse your request. Should we refuse a request, we will provide you with our reasons for doing so.

In the event you seek to update the personal information being held by us and there is a dispute regarding any of the personal information, we will make a note of the particulars of the dispute on the personal information provided by you to us. In the event that you have created an account with Francom Group using our Website, you are able to login to your account and view and/or update the personal information provided to us by you.

Should you make a request for us to delete your personal information, please be advised that we may not be obliged to do so or be able to do so, especially in circumstances where your file holds personal information about other customers/clients of Francom Group.

Francom Group reserves its right to charge you a reasonable administrative fee when considering your request.



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

7. Information Sharing and Disclosure

Francom Group do not rent, trade, or share Personal Information with third parties except to provide products or services you have requested, or when we have your permission, or under the following circumstances:

- We use other third parties such as a credit card processing company to bill you for goods sold on our Website, and an email service provider to send out emails on our behalf. When you sign up for our email list, we will share the necessary amount of personally identifiable information as necessary for the third-party to provide that service, including your name, address, credit card information and email address.
- We provide Non-Personal Information to interested third-parties for the purpose of understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality of the Website.
- To any entity, court or government body where we are obliged under law to disclose such information.
- To any person or entity which at the time of providing us with the personal information we have disclosed to you that we will provide that information to the named person or entity.

We may also seek to obtain personal or other information from some or all of the above so as to allow us to provide our Services to you. We obtain this personal and other information from third parties under the assumption that you have made that third-party aware of the intended purposes of us collecting, using and disclosing the personal or other information and that the third-party has been made aware of your referral to us of them. It will be your responsibility to ensure that you have made the above disclosure to the relevant third-party.

Keep in mind that any personal information, or comment that you voluntarily disclose on the Website, for example on comment pages, or on the blog forums, become publicly available. Your account name is displayed to other Users when you send and/or post messages through the Website. Please note that any comment or other content you post or send to the Website becomes published content and is not considered personally identifiable information subject to this Privacy Policy.

Transfer of information to a Credit Reporting Body

Under Division 2 of Part 111A of the *Privacy Act*, the transfer of your credit-related personal information (as outlined above) is permitted. This is information that a credit reporting body may provide about you, to assist us to assess your credit worthiness, which is essential to establish your eligibility for consumer credit with one or more of the entities in Francom Group.

If one or more of the entities in Francom Group provide a loan to you and you fail to meet your repayment obligations, or commit a serious credit infringement, we may be entitled to disclose this to a credit reporting body and it will be included on the credit file they hold about you.

Unless presented with clear and convincing evidence that the information is factually incorrect, or the default has been repaired with full payment of the amount owing, or we have entered into a payment arrangement with the consumer that is the subject of an agreement between both parties, we will not remove, or attempt to facilitate the removal of, this default information from either our files or the files of the credit reporting body and credit reports.



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

Transfer of information to ASIC or AFCA

In accordance with our Australian Credit Licence (388158) conditions and a number of provisions in the Australian Securities and Investments, NCCP and the *Anti-Money Laundering and Counter Terrorism Finance (AUSTRAC) Acts*, we may be required to give ASIC, AUSTRAC or AFCA copies of all or some part of your personal and/or credit-related personal information.

8. Website Visit Information

Visiting our Website requires the collection of general and personal information. The collection of such information may be executed by our third-party contractors which collect information regarding your visit to our Website and includes the pages you accessed, the information downloaded, the date and time of your visit and your server address. Such information is collected for statistical purposes and assists us in keeping up the quality of our Website and its convenience for our users.

9. Service Providers

Francom Group may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used by you.

These third parties have access to your personal data to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. In any event, Francom Group do not accept any responsibility or liability if a Service Provider uses your Personal Data for any other purpose.

Francom Group reserve the right to use Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

10. Behavioural Remarketing

Francom Group reserves the right to use behavioural remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

Francom Group reserves the right to use Google AdWords. Google AdWords is a remarketing service provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>. Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

Francom Group reserves the right to use Twitter. Twitter is a remarketing service provided by Twitter Inc. You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>. You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>.

Francom Group reserves the right to use Facebook. Facebook is a remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>. To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>. Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>.

Francom Group reserves the right to use AdRoll. AdRoll is a remarketing service is provided by Semantic Sugar, Inc. You can opt-out of AdRoll remarketing by visiting this AdRoll Advertising Preferences web page: http://info.evidon.com/pub_info/573?v=1&nt=1&nw=false. For more information on the privacy practices of AdRoll, please visit the AdRoll Privacy Policy web page: <http://www.adroll.com/about/privacy>.

11. Complaints

We would encourage you to make direct contact with us should you not be satisfied with the way in which we have dealt with your personal information. Upon receipt of your complaint we will reasonably attempt to deal with your complaint. Should you be of the view that our attempted resolution of your complaint was not reasonable, you may refer your matter to the Office of the Federal Privacy Commissioner at website: www.privacy.gov.au or telephone 1300 363 992.

12. Links to External Websites

We have included links to external websites for your convenience. Francom Group is not aware of and is not responsible and/or liable for the content uploaded or the privacy practices of such external websites. It will be your responsibility to ensure that these websites comply with the relevant laws and privacy practices prior to your intended use of these websites. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

13. Confidentiality and Security

We follow generally accepted industry standards to protect the personally identifiable information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

We limit access to Personal Information about you to employees who we believe reasonably need to



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

come into contact with Personal Information to provide products or services to you or in order to do their jobs.

The security of your personal information is important to us.

14. International Users

If you are accessing the Website from any other region with laws or regulations that govern the collection of personal data or information, its use and disclosure which are different to Australian laws or our privacy policy as incorporated in our Terms and Conditions, then in that event, we wish to advise that by your use of the Website you will be transferring your personal information into Australia and that you consent to such transfer.

Your connection to the Website will be through Australian servers and all personal and general information collected by us will be processed within Australia where Francom Group servers and internal systems are located.

15. Credit Reporting Bodies

In accordance with all relevant legislation, Francom Group and any of its related entities reserve the right to provide information to and request information from a credit reporting body.

Process For Collecting Information From Credit Reporting Bodies

To obtain a credit report about you, we are required to provide certain information that the credit reporting body will note on your credit file, along with the enquiry we make about you. In accordance with the credit reporting body's policies, this information is likely to appear on your credit report and will be accessible by credit providers who are customers of each relevant credit reporting body if you apply for a loan now or in the future.

This identity and credit information and these listings could adversely impact on your future applications for credit, if the relevant future credit provider's application approval policies and processes include consideration of the number of past inquires as being indicative of something adverse or negative about you as a borrower and at the credit provider's discretion.

We do not have any control over or input into any credit reporting body's policies with regard to the content of their credit reports. If you have applied for a loan with one of the entities in Francom Group, you should have been provided with a Privacy and Electronic Communications Consent Agreement that includes further detail concerning privacy for borrowers. When you indicate your consent or acceptance of that Privacy and Electronic Communications Consent Agreement, you will be agreeing to the possibility that the current or future information on your credit report may prevent you from obtaining the loan you are seek now or in the future.

Information Provided By Credit Reporting Or Reference Bodies

In accordance with all applicable legislation and subject to Part 111A of the *Privacy Act*, credit reporting bodies (such as, Equifax) are permitted to collect from us, other credit providers and from elsewhere, the following information about you which may be included on your credit file held by the credit reporting body. This information will be available to us and to any other client of the credit reporting body who



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

makes a credit inquiry, seeking a credit report of some sort from that credit reporting body. Some of this information may be collected from us, some from other clients of the credit reporting body and some from other sources.

This information is limited to personal credit information, credit reporting information, credit ID information and credit capacity information, and includes:

- identification information;
- consumer credit liability information;
- repayment history information;
- a statement that an information request has been made by us, another credit provider, broker, mortgage insurer or trade insurer, or other client of the credit reporting body;
- the type of consumer credit or commercial credit;
- default information;
- serious credit infringement information;
- payment information;
- new arrangement information, including changes in the terms and conditions of your credit contract;
- court proceeding information;
- personal insolvency information;
- publicly available information as to your credit worthiness (subject to some exceptions); and/or
- a credit provider's opinion that you have committed a serious credit infringement in relation to the consumer credit which credit provider has provided to you; and/or
- the total indebtedness and any accumulation of such due to defaults in payment and associated fees and interest charges before, during and after the issuing of the *Privacy Act's* Section 6Q and Section 21D Notices.

Please note that the credit reporting body has discretion as to what it will include in a credit report about you and there is no opportunity under the *Privacy Act*, or *Credit Reporting Privacy Code*, to complain if the credit reporting body chooses not to list certain information it holds about you, including information we have provided. Should you have any issues with the information that the credit reporting body holds and uses in their reports about you, the complaint should be made direct to the credit reporting body.

Changing or Correcting your credit information/credit eligibility information provided to a Credit Reporting Body

Where we have previously provided factually incorrect information to a credit reporting body, we will contact them and inform them of the corrected information. Should no correction be necessary because, after careful internal review, the information kept on file by us is accurate, up-to-date, complete, relevant and not misleading, you will be informed of this and we will not contact the credit reporting body to change any information on its files that correctly reflects our information.

You are advised that to do so would be aiding and abetting a credit reporting body to commit an offence under Sections 14 and Section 16A(4) of Privacy Principle 7 in the *Privacy Act*, which attracts fines of a minimum of 37,000.00 and a maximum of \$370,000.00. It may also be a serious breach of our contract with a credit reporting body, attract offences under the Corporations Act and, possibly, the Crimes Act.



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

If we agree that some information held by us and provided to a credit reporting body is inaccurate, not up-to-date, incomplete, irrelevant or misleading, but that other information including information about defaults in previous and current loan repayments held by us, provided to a credit reporting body and included in their credit reports is accurate, up-to-date, complete, relevant or not misleading, only the information that needs correction will be amended, or sought to be amended or removed from the credit reporting body's file and credit reports, as is appropriate. The accurate information will also not be amended or removed from our files, nor will any correct notation that a credit enquiry has occurred.

Once you have inspected the personal credit information we hold on file about you, you may inform our us if you have discovered any information that is inaccurate, out-of-date, incomplete, irrelevant or misleading. We would be pleased to amend the file within 30 days, but, in most cases, we will require appropriate evidence from you to support your request. Please note that, in the exercise of this correction duty, we are lawfully entitled to consult with a credit reporting body and/or another credit provider. You, and any entity consulted in the process, will be informed in writing of any correction.

Equifax

The credit reporting body we use is Equifax. You may contact Equifax by telephone on 13 8332 or visit their website at www.equifax.com.au if:

- you believe that the information they have on their file about you needs amendment or correction;
- you want the body to hold off disclosing any information from the their file about you because, on reasonable grounds, you believe that you have been, or are likely to be, a victim of fraud;
- you do not want the body to use their credit reporting information for the purposes of pre-screening for direct marketing by a credit provider;
- you would like a copy of Equifax's privacy policy, which you may request from Equifax and which Equifax will provide by email or by mail, at no charge.

Please visit www.equifax.com.au to view more information about:

- How you can obtain Equifax's privacy policies;
- Your right to access and correct information Equifax holds about you;
- How you may complain if you think Equifax has breached privacy and credit reporting laws that apply to you;
- Your right to request that Equifax not use any information held about you for purposes of pre-screening, for any company to undertake direct marketing that involves you;
- Your right to request that Equifax not use or provide to its clients any information about you if you believe that you are a victim of fraud.

16.Changes and Updates to this Privacy Policy

Francom Group may update this Privacy Policy at any time in its sole discretion and without prior notice. We will strive to notify you about significant changes in the way we treat Personal Information by sending a notice to the primary email address specified in your account and/or by placing a notice on the Website.

17. Complaints



PRIVACY POLICY

Including Statement of Notifiable Matters and More Information

If you would like to make a complaint about us, please send an email to complaints@francomgroup.com.au. If you are not satisfied, your complaint will be escalated to our Internal Dispute Manager. If you are still not satisfied, you can lodge a complaint with the Privacy Commissioner at the Office of the Australian Information Commission or the External Dispute Resolution Scheme, which is AFCA, at no charge. The contact details are as follows:

Office of the Australian Information Commission
GPO Box 5218, Sydney NSW 2001
Phone: 02 9284 9753
Enquiries: 1300 363 992
Website: www.oaic.gov.au

OR

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

18. Effective Date

This Privacy Policy was last modified in July 2020.