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INTERIM FINANCE PTY LTD
ACN 125 897 716

COMMERCIAL BRIDGING CAPITAL PTY LTD
ACN 151 100 613

AUSTRALIAN BRIDGING FINANCE PTY LTD
ACN 159 888 089
ACL NO: 452880

PRIVACY POLICY

Interim Finance Pty Limited ACN 125 897 716, Commercial Bridging Capital Pty Limited ACN 151 100 613, Australian Bridging Finance Pty Limited ACN 159 888 089 (Australian Credit Licence No: 452880) ('we', 'us', 'our') is bound by the Australian Privacy Principles under the *Privacy Act 1988* (Cth) (**Privacy Act**). We are also bound by Division 3 of Part IIIA of the Privacy Act, which regulates the handling of credit information, credit eligibility information and related information by credit providers, and the Credit Reporting Privacy Code.

This Privacy Policy outlines how we deal with your personal information (including credit-related information), as well as our legal obligations and rights as to that information. If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

Key types of information

Certain words have special meanings when used in this Privacy Policy. These are shown below.

Personal information means information or an opinion about an individual who is identified, or who can reasonably be identified, from the information. Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about the individual. Generally speaking, personal information includes any information from which your identity is apparent.

Credit eligibility information means information that has been obtained from a credit reporting body, or that has been derived from that information that is about an individual's credit worthiness.

Credit-related information means credit information, credit eligibility information and related information.

Credit information includes the type and amount of credit provided to you, repayment history information, default information (including overdue payments) and court information. More specifically, it includes:

- information about an individual, such as their name and address, that we may use to identify that individual
- information about an individual's current or terminated consumer or commercial credit accounts and an individual's repayment history
- the type and amount of credit applied for in any previous consumer or commercial credit applications to any credit provider, where that credit provider has requested information
- information about an individual from a credit reporting body

- information about consumer credit payments overdue for at least 60 days and for which collection action has started
- information about non-consumer credit payments that are overdue
- advice that payments that were previously notified to a credit reporting body as overdue are no longer overdue
- information about new credit arrangements an individual may have made with a credit provider, in relation to consumer credit currently or previously held, to deal with any defaults or serious credit infringements by that individual
- information about court judgments which relate to credit that an individual has obtained or applied for
- information about an individual on the National Personal Insolvency Index
- publicly available information about an individual's credit worthiness, and
- an opinion of a credit provider that an individual has committed a serious credit infringement of credit provided by that credit provider.

We may not hold all of these kinds of information about a particular individual. However, if we hold any of these kinds of information, it is protected as "credit information" under this Privacy Policy.

Collection

Wherever possible, we will collect personal information (including credit information) directly from you. This information will generally come from what you provide in your application for one of our products or services and supporting documentation.

We only ask for personal information relevant to our business relationship with a customer. When you apply for one of our products or services, or ask for information about one of our products or services (including products or services we may already be providing you), we may request:

- identifying information, such as your name, address and other contact details and your date of birth
- information about your financial position, such as your income, expenses, savings and assets and any (other) credit arrangements
- your employment details
- your tax file number, and
- your reasons for applying for, or asking for information in relation to, a product or service.

We may also collect personal information (including credit-related information) about you from third parties, such as any referees that you provide, your employer, other credit providers and third party service providers including credit reporting bodies.

Credit reporting bodies collect credit information about individuals which they provide as credit reports to credit providers and others in the credit industry to assist them in managing credit risk, collecting debts and other activities. You can also ask a credit reporting body, through contact details on their website, not to use or disclose your personal information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud.

Some information is created through our internal processes, such as credit eligibility scoring information.

Use

We may use your personal information (including credit-related information) for the purpose of providing products and services to you and managing our business. This may include:

- assessing and processing your application for the products and services we offer
- establishing and providing our systems and processes to provide our products and services to you
- executing your instructions
- charging and billing
- uses required or authorised by law, such as in connection with (without limitation):
 - the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), which may require us to collect personal information when verifying your identity or to co-operate with authorities in relation to you or your activities
 - the *National Consumer Credit Protection Act 2009* (Cth), which may require us to make inquiries about you when assessing any application for consumer credit by you;
 - the *Personal Property Securities Act 2009* (Cth), under which we may need to collect personal information about you to record a security interest on the Personal Property Securities Register
 - the *Real Property Act 1900* (NSW) and equivalent legislation in other Australian states and territories, which may require us to collect personal information about you to confirm your identity and record the steps taken to comply with that requirement (as well as keeping copies of associated documents for, in some circumstances, prescribed periods) before presenting a mortgage or other document for registration or lodgment)
- maintaining and developing our business systems and infrastructure
- research and development
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems, or
- direct marketing.

In general, we do not use or disclose your personal information (including credit-related information) for a purpose other than:

- a purpose set out in this Privacy Policy;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise disclosed to you to which you have consented.

Disclosure

We may disclose your personal information (including credit-related information) to other organisations, for example:

- external organisations that are our assignees, agents or contractors
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants
- insurers and re-insurers, where insurance is provided in connection with our services to you
- superannuation funds, where superannuation services are provided to you
- other financial institutions, lenders, or brokers, for example, when you apply for a loan from another credit provider and you agree to us providing information
- credit reporting bodies, including disclosing that you are in default under a credit agreement or commit a serious credit infringement, if that is the case
- lenders' mortgage insurers, where relevant to credit we have provided
- debt collecting agencies, if you have not repaid a loan as required
- our professional advisors, such as accountants, lawyers and auditors

- state or territory authorities that give assistance to facilitate the provision of home loans to individuals
- certain entities that have bought or otherwise obtained an interest in your credit product, or that are considering doing so, and their professional advisors
- Australian Securities and Investments Commission, in connection with any request that may make from us about our business or you specifically
- our external dispute resolution body
- your representative, for example, lawyer, mortgage broker, financial advisor, accountant or attorney, as authorised by you, or
- if required or authorised by law, to government and regulatory authorities.

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and privacy obligations with respect to the protection of your personal information.

We may disclose your personal information overseas. The country where we are likely to disclose your personal information is the United States of America, New Zealand or the United Kingdom. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in this Privacy Policy.

Sensitive information

Where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information about an individual's health, and membership of a professional or trade association, criminal record and health.

Unless we are required or permitted by law to collect that information, we will obtain your consent. However, if the information relates directly to your ability to meet financial obligations that you owe to us, you are treated as having consented to its collection.

Refusal of credit applications

We may refuse an application for consumer credit made by you individually or with other applicants. Our refusal may be based on credit eligibility information obtained from a credit reporting body about you, another applicant and/or another person proposed as guarantor. In that case, we will give you written notice that the application has been refused on the basis of that information. We will tell you the name and contact details of the relevant credit reporting body and other relevant information.

We may refuse an application for non-consumer credit made by you individually or with other applicants. We will notify if your application has been refused; however, unless we are required to do so by law, we may not tell you why. To the extent we are permitted by law, we may not tell you the name and contact details of the relevant credit reporting body and other relevant information.

Unprocessed applications are not retained and all reasonable steps are taken to ensure that all personal information contained in unprocessed applications is securely destroyed or de-identified.

Security

We take all reasonable steps to ensure that your personal information (including credit-related information), held on our website or otherwise, is protected from:

- misuse, interference and loss, and
- unauthorised access, disclosure or modification.

We ask you to keep your passwords and personal identification numbers safe, in accordance with our suggestions.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we take reasonable steps to ensure that it is destroyed or de-identified.

Website

This section explains how we handle personal information and credit information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact our Privacy Officer, whose details are set out below, as there are other ways for you to provide us with your personal information.

Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we may collect information about your visit, such as:

- the time and date of the visit
- any information or documentation that you download
- your browser type, and
- internet protocol details of the device used to access the site.

Our website may include a number of calculators, which may require you to enter your personal details. If you save the data you enter on the calculator, this information may be stored.

Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies; however doing so might prevent you from accessing the secured pages of our website.

Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

Security

We use up-to-date security measures on our website to protect your personal information and your credit information. Any data containing personal, credit or related information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

Links on our website

Our website may contain links to third party websites.

The terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information or credit information, you will need to obtain a copy of their privacy policy.

Access

You may request access to the personal information (including credit-related information) that we hold about you at any time from our Privacy Officer whose details are set out below.

We will respond to your request for access within a reasonable time. If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can contact our Privacy Officer if you would like to challenge our decision to refuse access.

We may recover the reasonable costs of our response to a request for access to personal information.

Accuracy

We take reasonable steps to make sure that the personal information (including credit-related information) that we collect, use or disclose is accurate, complete and up-to-date. However, if you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting our Privacy Officer whose details are set out below.

Marketing

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We are permitted to do this while you are our customer, and even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes.

We will consider that you consent to this, unless you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, such as email. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by contacting our Privacy Officer whose details are set out below, or by 'unsubscribe' from our email marketing messages.

To help us reach the right people with our credit direct marketing, we may ask a credit reporting body to "prescreen" a list of potential recipients of our direct marketing against our eligibility criteria to remove recipients that do not meet those criteria. From 12 March 2014, the credit report body cannot use information about your existing loans or repayment history in carrying out its pre-screening and it must destroy its pre-screening assessment once it has given us, or a contractor acting on our behalf, the list of eligible recipients. If you do not want your credit information used for pre-screening by a credit reporting body that holds credit information about you, you can opt-out by informing that credit reporting body, whose contact details are on their website.

Changes to the Privacy Policy

We may make changes to the Privacy Policy from time to time (without notice to you) that are necessary for our business requirements or the law or otherwise are considered appropriate by us.

Questions & Complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information (including credit-related information), please contact our Privacy Officer whose

details are set out below. You can also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible. You will receive an acknowledgment of your complaint as soon as practicable and in any case within 7 days after we receive it. We will investigate all complaints and aim to resolve them within 30 days. If we cannot resolve your complaint within this period we will notify you as to the reasons why, specify a date when we expect a resolution and seek your agreement to extend this 30 day period (if you do not agree, we may then not be able to resolve your complaint).

If we consider it necessary in order to deal with your complaint, we may consult with a credit reporting body or another credit provider. If, while the complaint remains unresolved, we are disclosing information subject to the complaint to a third party, we may advise the third party about the complaint.

If we find a complaint justified, we will resolve it. If necessary, we will change policies and procedures to maintain our high standards of performance, service and customer care.

If you are not happy with the way your privacy-related complaint is being handled, you can also contact the Privacy Officer using the contact details below.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints.

If your complaint relates to **Australian Bridging Finance Pty Ltd (ABF)**, you may contact either the Federal Privacy Commissioner or the Credit Ombudsman Service Limited (**COSL**). COSL is ABF's approved external dispute resolution scheme. The relevant details are below.

Credit Ombudsman Service Limited

Post: PO Box A252, South Sydney NSW 1235

Telephone: 1800 138 422

Website: www.cosl.com.au

Federal Privacy Commissioner

Post: GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

If your complaint relates to **Commercial Bridging Capital Pty Ltd** or **Interim Finance Pty Ltd**, you may contact the Federal Privacy Commissioner on the details below.

Federal Privacy Commissioner

Post: GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

Any of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

Privacy Officer

Our Privacy Officer's contact details are:

Address: Suzie Bliss
Interim Finance Pty Ltd
Suite 604, Level 6
139 Macquarie St
SYDNEY NSW 2000

Telephone: 1300 731 317

Email: suzie@interimfinance.com.au