

PRIVACY STATEMENT

Launch Finance Pty Ltd (ABN 17 163 528 701) is an Australian Credit Licensee (Australian Credit Licence Number 495354) (“Launch Finance”). Launch Finance has authorised your credit representative to provide you with credit assistance.

We need to collect personal information about you to provide you with credit assistance and related services. This Privacy Statement tells you how we collect your information, what we use the information for and who we share the information with. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

Launch Finance is committed to respecting and protecting the security of your personal information, and this Privacy Statement explains how we handle it.

WHAT IS PERSONAL INFORMATION?

Personal Information is defined in the *Privacy Act 1988* (“Privacy Act”) as information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable. The personal information we hold may include **credit-related information**.

Credit-related information means:

- **Credit information** (which includes your identity): the type, terms and maximum amount of credit provided to you, 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**: Information supplied to us by a credit reporting body.

We use credit-related information to assess your eligibility for finance. Usually, credit-related information is exchanged between credit providers and credit reporting bodies.

WHAT IS CREDIT ASSISTANCE?

We give you credit assistance when:

- we assist you to apply for a particular loan or lease;
- we suggest you apply for a particular loan or lease (or suggest you apply for an increase to an existing loan); or
- we suggest you remain in your current loan or lease.

In order to provide you with credit assistance, we will collect personal information from you.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The types of personal information that we collect and hold about you may include:

- Identification information such as your name, postal or email address, telephone numbers and your date of birth;
- Other contact details such as social media handles;
- Financial details such as income information, loan details and investment details;
- Other information we think is relevant to your credit application.

When the law authorises us to collect information

We may collect information about you because we are required or authorised by law to collect it. For example, we require personal information to verify your identity under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (“AML/CTF Act”).

What information do we collect via the Internet?

We engage with some customers through social media channels and we may collect information about you when you interact with us through these channels. However, for all confidential matters, we will interact with you through a secure forum.

To improve our services, we may collect de-identified information from web users. That information may include IP addresses or geographical information. This information is collected to ensure the integrity of our IT systems.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Unless it's unreasonable or impractical, we will try to collect personal information directly from you. It is important that you assist us by providing complete information and keep your contact details up to date.

There are a number of ways in which we may seek information from you, including forms you complete, information you provide by telephone or letter and information provided by electronic means including website, email or SMS. Please note: we will never ask for security sensitive information electronically. If you are unsure, please contact our office to discuss.

How we collect your information from other sources

Sometimes, we will collect information about you from other sources. We will only do this where reasonably necessary to do so, and only in accordance with the provisions of the *Privacy Act 1988*, for example:

- We collect information from third parties about the loan or lease made available to you arising from the credit assistance we provide to you;
- We are unable to contact you and we rely on public information to update your contact details; or
- We exchange information with your legal or financial advisers or other appointed representatives.
- Other main sources for collecting personal information include, but are not limited to:
 - Your co-loan applicants;
 - Your guarantors/proposed guarantors;
 - Your employer;
 - Organisations that help us to conduct credit history checks;
 - Organisations that check the security you are offering i.e. property valuers;
 - Organisations that issue identification documents to assist us in verifying your identity; and
 - Our service providers involved in helping us to process credit applications.

What if you don't want to provide us with your personal information?

If you don't provide information that has been requested by us, it may not be possible:

- For us to provide credit assistance to you;
- Recommend a loan or lease that is relevant to your circumstances;
- Verify your identity as required by the AML/CTF Act; or
- Let you know about other products or services that may be suitable to your circumstances.

What do we do when we get information we didn't ask for?

In circumstances where we receive personal information that we didn't ask for, we will first check whether that information is reasonably necessary for us to provide you with credit assistance. If it is, we will treat this information in the same manner that we treat all other personal information. If not, we will ensure that the information is de-identified and destroyed in a secure manner.

How do we store your personal information?

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

- Secure document storage;
- Secure document destruction;
- Security measures and disaster recovery measures for our IT systems; and
- Documented policies and procedures and staff training to ensure that personal information is only disclosed to authorised persons.

We may store personal information (both physical and electronic) with third party storage providers. Where we do this, we have documented policies and procedures in place to review the reputation and integrity of these storage providers, and we have appropriate contractual arrangements with the storage providers to ensure appropriate measures are taken to secure the personal information.

What happens when we no longer need your personal information?

When we provide you with credit assistance, we are required to maintain copies of your personal information for a minimum period of seven years from the date we provided you with credit assistance. Under some circumstances, we may be required to retain copies of your personal information for even longer.

When we are no longer required to maintain copies of that personal information, your personal information will be de-identified and securely destroyed.

We collect, hold and use your personal information to allow us to provide you with the services you have asked for. This means that we use your personal information to:

- Identify you;
- Provide you with credit assistance;
- Give you information about credit products or related services;

- Consider whether you are eligible for a particular credit product or any related service that you have requested;
- Administer the services we provide, for example, to respond to requests or complaints;
- Prevent fraud or crime;
- As required by any applicable law; and
- Any purpose to which you have consented.

Can we use your personal information for marketing our products and services?

We may use your personal information to let you know about other products or services that may be of interest to you. With your consent, we may disclose your personal information to third parties for the purpose of connecting you with other businesses or customers.

You can opt out at any time if you no longer wish to receive marketing information from us or withdraw your consent for personal information to be provided to third parties. We will action your request as soon as practicable. We will never sell your personal information to any organisation.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may use and share your personal information with other people or organisations, as follows:

- Professional Lenders Association Network of Australia (“PLAN”), when submitting loan or lease applications to lenders or lessors on the PLAN approved panel. PLAN provides mortgage aggregation services to Launch Finance and its credit representatives, which include IT systems, loan information and lodgement systems, training and development, commission processing, conferences and professional development events, and assistance with regulatory and compliance obligations. You can view PLAN’s privacy notice at <http://www.planaustralia.com.au/borrower-privacy-statement>. It sets out how PLAN manages your personal information and where you can find its privacy policy;
- In accordance with Launch Finance’s policies and procedures, we may share your personal information with the directors or other employees of Launch Finance as deemed necessary to perform licensee compliance functions;
- Your representatives (lawyers, settlement agents, accountants or real estate agents);
- Referrers that referred your business to us;
- Valuers;
- Lenders, lessors, lenders mortgage insurers and other loan or lease intermediaries;
- Government agencies, as required by law (in some instances, these agencies may share information with relevant foreign government authorities);
- Service providers that assist us to conduct business;
- Guarantors and prospective guarantors for your loan or lease;

- Any organisation that wishes to invest in our business or assets; and
- Any third party to which you consent to us sharing your personal information.

We are not likely to disclose your personal information to organisations overseas. However, we may store your personal information in cloud based or other types of networked electronic storage. It is not always practicable to know which country the servers for the electronic storage are based in.

HOW DO YOU ACCESS YOUR PERSONAL INFORMATION?

You have the right to request access to your personal information at any time, and we will endeavour to provide access unless there are legal reasons why we can't. Your request should be made in writing, where practical. We may charge a small fee to cover our administration costs, if necessary.

In some circumstances, we may not be able to give you access to your personal information. These circumstances are:

- We reasonably believe that giving you access to your personal information may pose a threat to life, health or safety of an individual or public safety;
- Giving you access to your personal information may have an unreasonable impact on the privacy of other individuals;
- The request is frivolous or vexatious;
- The information relates to existing or anticipated legal proceedings, and the information would not be accessible during discovery phase of those proceedings;
- The information could prejudice negotiations with you;
- It would be unlawful to provide the information;
- Denying access to your personal information is required or authorised by Australia law, including any orders made by an Australian court or tribunal;
- It may prejudice the investigations or activities of a government enforcement body (e.g. the police or ASIC);
- The information may prejudice the confidentiality of our commercial information.

In circumstances where we cannot provide access to your personal information, we will provide you with our reasons in writing. If you disagree with our decision, you can make a complaint to the Office of Australian Information Commissioner. See below.

HOW DO YOU CORRECT YOUR PERSONAL INFORMATION?

If you think the personal information we hold about you may be incorrect, please contact us so that we can amend it. Changes to your personal information may be required if:

- You realise that it is inaccurate;

- It is out of date;
- It is incomplete;
- It is irrelevant; or
- It is misleading.

We will endeavour to action any requested amendments to your personal information within thirty days. If we cannot action your amendments within this timeframe or at all, we will notify you in writing with our reasons why, within five working days. If you disagree with our decision, you have the right to make a formal complaint.

Where we can, we will assist you to amend your personal information with other relevant organisations, such as your lender. If we are unable to assist, we will notify you in writing.

NOTIFIABLE MATTERS

The law requires us to notify you if we suspect an eligible data breach has occurred. An eligible data breach occurs when personal information held by us is lost or subjected to unauthorised access or disclosure AND it is likely to result in serious harm to you. In circumstances where we have assessed that a notifiable data breach has or may have occurred, we will notify you with details of the suspected data breach and options to mitigate any loss and/or harm that may occur. We will also report the data breach to the Office of the Australian Information Commissioner (“OAIC”).

HOW DO YOU MAKE A COMPLAINT RELATING TO YOUR PERSONAL INFORMATION?

If you have a complaint about we handle your personal information, please contact us at:

Launch Finance Pty Ltd

Office: Suite 43, 11 Preston Street, COMO WA 6152

Post: PO Box 148, SOUTH PERTH WA 6951

Phone: 08 9367 4222

Fax: 08 9367 3500

Email: operationsmanager@launchfinance.com.au

Launch Finance is committed to resolving consumer complaints promptly and efficiently. We will acknowledge receipt of your complaint in writing within five working days. We will respond substantively to the issues raised in your complaint in writing within thirty days. If we can't respond substantively within thirty days, we will contact you to discuss the reasons why and provide you with a timeframe. If you do not agree to the proposed timeframe, you can escalate your complaint to the Office of the Australian Information Commissioner.

If you are not satisfied with our substantive response including any proposed resolutions, then you can escalate your complaint to the Office of the Australian Information Commissioner or to the Australian Financial Complaints Authority (“AFCA”):

	OAIC	AFCA
Phone:	1300 363 992	
Email:	enquiries@oaic.gov.au	info@afca.org.au
Online:	www.oaic.gov.au	www.afca.org.au
Mail:	OAIC GPO Box 5218 Sydney NSW 2001	AFCA GPO Box 3 Melbourne VIC 3001

CONTACT US

Please contact us if you have any questions or comments about this Privacy Statement. You can contact us at:

Launch Finance Pty Ltd

Office: Suite 43, 11 Preston Street, COMO WA 6152

Post: PO Box 148, SOUTH PERTH WA 6951

Phone: 08 9367 4222

Fax: 08 9367 3500

Email: operationsmanager@launchfinance.com.au

CHANGES TO THE PRIVACY STATEMENT

This Privacy Statement may be amended from time to time. You can access a copy of the most recent Privacy Statement at any time by visiting our website at launchfinance.com.au. Alternatively, you can contact us directly and request a copy.