



*Better service, better products, better rates*

## **Better Mortgage Management**

***Privacy Policy***

**Issued Nov 2018**

Better Mortgage Management Pty Ltd ABN 65 089 835 192, Australian Credit Licence Number 389612 (collectively known as "BMM" and also referred to in this Policy as "us," "we" and "our") seek to provide the best possible service to its customers by providing the best possible range of financial products and services.

We understand how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information that you may provide to us.

We recognise 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 is received by us will be treated with appropriate respect ensuring protection of your personal information.

Our commitment in respect of personal information is to abide by the *Privacy Act 1988* (Cth) and any other relevant law.

This Policy also includes our credit reporting policy, that is, it covers additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information below as **credit information**.

## What personal information do we collect and hold?

### 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. The personal information we hold about you may also include credit information.

**Credit information** is information which is used to assess your eligibility to be provided with credit and may include any finance that you have outstanding, your repayment history in respect of that credit, and any defaults. Usually, credit information is exchanged between lenders and credit reporting bodies.

The kinds of personal information may include (but is not limited to) your name, date of birth, driver's licence number, marital status, phone number, email address, current (or last known) address and 2 previous addresses, nationality, employment history, income, assets, liabilities and repayment history information.

### General information

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

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- other contact details such as social media handles;
- financial details such as your tax file number;
- health information;
- credit information such as details relating to credit history, credit capacity, and eligibility for credit ('credit worthiness'); and
- other information we think is necessary.

If you are applying for credit we may also collect other information such as the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses.

## Information from a credit reporting body

We may collect your previous 2 years of credit information and exchange this information with credit reporting bodies and other entities.

The types of credit information include:

**ID information:** a record of your name(s) (including an alias or previous name), date of birth, gender, current or last known address and previous two addresses, name of current or last known employer and drivers licence number.

**Information request:** a record of a lender asking a credit reporting body for information in relation to a credit application, including the type and amount of credit applied for.

**Default information:** a record of your consumer credit\* payments being overdue.

**Serious credit infringement:** a record of when a lender reasonably believes that there has been a fraud relating to your consumer credit or that you have avoided paying your consumer credit payments and the credit provider can't find you.

**Personal insolvency information:** a record relating to **your** bankruptcy or your entry into a debt agreement or personal insolvency agreement.

**Court proceedings information:** an Australian court judgment relating to your credit.

**Publicly available information:** a record relating to your activities in Australia and your credit worthiness.

**Consumer credit liability information:** certain details relating to your consumer credit, such as the name of the credit provider, whether the credit provider has an Australian Credit Licence, the type of consumer credit, the day on which the consumer credit was entered into and terminated, the maximum amount of credit available and certain repayment terms and conditions.

**Repayment history information:** a record of whether or not you've made monthly consumer credit payments and when they were paid.\*\*

**Payment information:** If a lender gave a credit reporting body default information about you and the overdue amount is paid, a statement that the payment has been made.

**New arrangement information:** If a lender gave a credit reporting body default information about you and your consumer credit contract is varied or replaced, a statement about this.

We exchange this credit information for the purposes of assessing your application for credit and managing that credit. Some of that information may reflect adversely on your credit worthiness, for example, if you fail to make payments or if you commit a serious credit infringement (like obtaining credit by fraud). This credit information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store the credit information we hold about you.

When we obtain credit information from a credit reporting body about you, we may also seek publicly available information and information about any serious credit infringement that you may have committed.

We base some things on the information we get from credit reporting bodies, such as:

- our summaries of what the credit reporting bodies tell us; and
- credit scores. A credit score is a calculation that lets us know how likely a credit applicant will repay credit we may make available to them.

Information that we get from a credit reporting body or information we derive from such information is known as **credit eligibility information**.

## Notifiable Matters

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information. You may request to have these notifiable matters (and this Privacy Policy) provided to you in an alternative form.

We exchange your credit information with credit reporting bodies. We use the credit information that we exchange with the credit reporting body to assess your creditworthiness, assess your application for finance and managing your finance. If you fail to meet your payment obligations in relation to any finance that we have provided or arranged or you have committed a serious credit infringement then we may disclose this information to a credit reporting body.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed.

### **What sensitive information do we collect?**

Sometimes we need to collect sensitive information\* about you, for instance in relation to some insurance applications. This could include things like medical checks, medical consultation reports or other information about your health. Unless required by law, we will only collect sensitive information with your consent.

### **When the law authorises or requires us to collect information**

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

## **How do we collect your personal information?**

### **How we collect and hold your information**

Where reasonable and practical we will collect information about you from you directly (referred to as '**solicited information**'). Most information will be collected from the application and from the records we maintain about the products and services you receive from us. We may verify that information from sources referred to in the application or in this Privacy Policy

Other instances where we might collect personal information from you include where you:

- Make an enquiry with us via email or telephone;
- Lodge a loan enquiry or request a quote through our website;
- Apply to be a borrower or guarantor;
- Attend an event hosted by us;
- Apply for employment with us; or
- Apply for accreditation as a business partner, aggregator, broker or introducer of loans or other products.

However, we will also collect information about you from third parties, such as a partner or spouse who contacts us on your behalf, from our contractors who supply services to us, through our business partners and referrers (such as mortgage originators and brokers), from a publicly maintained record or from other individuals, credit reporting bodies or companies authorised by you.

If we are required to collect information about you from other sources, we will do so as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- We obtain information (including commercial credit information concerning your credit worthiness or history, consumer information and collection of overdue payments information) from a credit reporting body for any purpose described below;
- We obtain information about your loan or a guarantee of the loan from another organisation described above;

- We can't get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us;
- We check property, you offer as security, through public registers or our service providers; or
- We exchange information with your legal or financial advisers or other representatives

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

If you don't provide your personal information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your needs.

### **How we collect and hold your credit information**

We will collect your credit information from details included in your application for credit (whether paper based, phone or electronic) and from the records we maintain about the products or services you receive from us. In addition to what we say above about collecting information from other sources, other main sources for collecting credit information are:

- credit reporting bodies;
- other credit providers;
- your co-loan applicants or co-borrowers;
- your guarantors/proposed guarantors;
- your employer, accountant, real estate agent or other referees;
- your agents and other representatives like your referrers, brokers, solicitors, conveyancers and settlement agents;
- organisations that help us to process credit applications such as mortgage managers;
- organisations that check the security you are offering such as valuers;
- organisations involved in the securitisation of our loans such as loan servicers, trust managers, trustees and security trustees;
- organisations providing lenders mortgage insurance and title insurance for us;
- bodies that issue identification documents to help us check your identity; and
- our service providers involved in helping us to provide credit or to administer credit products, including our debt collectors and our legal advisers.

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

People often share information with us we haven't sought out (referred to as '**unsolicited information**'). Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

### **When will we notify you that we have received your information?**

When we receive personal information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

### **How do we take care of your personal information?**

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse,

interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements of our employees;
- document storage security policies;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites.

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

### **What happens in the unlikely event of a data breach?**

In the unlikely event that a data breach did occur which was likely to result in serious harm, we would promptly notify you and the Australian Information Commissioner of the breach, and provide you with the steps you should take in response.

### **What happens when we no longer need your information?**

We'll only keep your information for as long as we require it for our purposes. We're also required to keep some of your information for certain periods of time under law, such as the Corporations Act, the Anti-Money Laundering & Counter-Terrorism Financing Act, and the Financial Transaction Reports Act for example. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

## **How we use your personal information**

### **What are the main reasons we collect, hold and use your 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\*:

- Giving you information about loan products or related services;
- Considering whether you are eligible for a loan or any related service you requested;
- Processing the application and providing you with a loan or related service;
- Administering your loan or any related service, for example, to answer requests or deal with complaints;
- Identifying you;
- Telling you about other products or services it or its related companies make available and that may be of interest to you, unless you tell them not to;
- Allowing it to run its business efficiently and to perform administrative and operational tasks;
- Preventing or investigating any fraud or crime or any suspected fraud or crime;
- As required by law, regulation or codes binding it; and
- Any purpose to which you have consented.

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

We may use or disclose your personal information to let you know about new products and services, or running competitions or promotions and other opportunities in which you may be interested.

We may conduct these marketing activities via email, telephone, mail, or any other electronic means. We may also market our products to you through third party channels (such as social networking sites). We will always let you know that you can opt out from receiving our third party marketing offers.

...  
\*See Footnote 4  
...mers, we are happy to let them know how we obtained their  
flow opt-outs.

With your consent, we may disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organisation outside of BMM.

### **How we use your credit information**

In addition to the ways for using personal information mentioned above, we may also use your credit information to:

- enable a mortgage insurer or title insurer to assess the risk of providing insurance to us or to address our contractual arrangements with the insurer;
- assess whether to accept a guarantor or the risk of a guarantor being unable to meet their obligations;
- consider hardship requests; and
- assess whether to securitise loans and to arrange the securitising of loans.

## **Who do we share your personal information with?**

**To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others.** We may share your information with other organisations for any purposes for which we use your information.

We may need to share your personal information with:

- your representative or any person acting on your behalf (for example, financial advisers, lawyers, settlement agents, accountants, executors, administrators, trustees, guardians, brokers or auditors); and
- your referee such as your employer (to confirm details about you).

### **Sharing with Credit Reporting bodies**

We may disclose information about you to a credit reporting body if you are applying for credit or you have obtained credit from us or if you guarantee or are considering guaranteeing the obligations of another person to us or you are a director of a company that is loan applicant or borrower or guarantor. When we give your information to a credit reporting body, it may be included in reports that the credit reporting body gives other organisations (such as other lenders) to help them assess your credit worthiness.

As stated earlier, some of that information may reflect adversely on your credit worthiness, for example, if you fail to make payments or if you commit a serious credit infringement (like obtaining credit by fraud). That sort of information may affect your ability to get credit from other lenders.

### **Sharing with third parties**

We may share your personal information with third parties outside of BMM, including:

- those involved in providing, managing or administering your product or service;
- other relevant applicants registered on the BMM Loan Application Form;
- superannuation and managed funds organisations, and their advisers;
- medical professionals, medical facilities or health authorities who verify any health information you may provide;
- valuers, insurers (including lenders' mortgage insurers and title insurers) , re-insurers, claim assessors and investigators;
- brokers or referrers who refer your application or business to us;
- other financial institutions, such as banks;
- organisations involved in debt collecting, including purchasers of debt;
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- organisations involved in surveying or registering a security property or which otherwise have an interest in such property;
- real estate agents;
- government or regulatory bodies (including ASIC and the Australian Tax Office) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities);
- our accountants, auditors or lawyers and other external advisers;
- rating agencies to the extent necessary to allow the rating agency to rate particular investments;
- any party involved in securitising your facility, including re-insurers and underwriters, loan servicers, trust managers, trustees and security trustees;
- guarantors and prospective guarantors of your facility;
- organisations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- organisations that participate with us in payments systems including merchants, payment organisations and organisations that produce cards, cheque books or statements for us;
- organisations that assist with our product planning, research and development;
- mailing houses and telemarketing agencies who assist us to communicate with you;
- other organisations involved in our normal business practices, including our agents and contractors;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Courter Terrorism Financing Act 2006 (Cth)* or the *National Consumer Credit Protection Act 2009 (Cth)*;
- other individuals or companies authorised by you; and
- where you've given your consent.

### **Sharing outside of Australia**

We may disclose your personal and credit information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure. We will not share any of your credit information with a credit reporting body, unless it has a business operation in Australia. We are not likely to share credit information we obtain about you from a credit reporting body or that we derive from that information.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (a) The person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (b) You have consented to us making the disclosure

## How do you access your personal information?

### How you can generally access your information

We will provide you with access to the personal and credit information we hold about you, subject to limited exceptions in the Privacy Act as outlined below. You may request access to any of the personal or credit information we hold about you, at any time, using the details specified below

Depending on the type of request that you make we will respond to your request within a reasonable period of time. We may need to contact other entities to properly investigate your request.

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.

Some of the situations where we don't have to give you access include when:

- we believe there is a threat to life or public safety;
- there is an unreasonable impact on other individuals;
- the request is frivolous;
- the information wouldn't be ordinarily accessible because of legal proceedings;
- it would prejudice negotiations with you;
- it would be unlawful;
- it would jeopardise taking action against serious misconduct by you;
- it would be likely to harm the activities of an enforcement body (e.g. the police); or
- it would harm the confidentiality of our commercial information.
- In relation to **credit eligibility information**\*, the exceptions may differ.

An explanation will be provided to you if we deny you access to your personal information we hold.

### How to access your credit eligibility information

Where you request access to credit information about you that we've got from credit reporting bodies (or based on that information), you have the following additional rights.

We must:

- provide you access to the information within 30 days (unless unusual circumstances apply);
- make the information clear and accessible; and
- ask you to check with credit reporting bodies what information they hold about you.
- This is to ensure it is accurate and up-to-date.

We are not required to give you access to this information if:

- it would be unlawful; or
- it would be likely to harm the activities of an enforcement body (e.g. the police).

We may also restrict what we give you if it would harm the confidentiality of our commercial information.

An explanation will be provided to you if we deny you access to your credit eligibility information we hold.

## How do you correct your personal information?

### How we correct your 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 may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information (including your credit related personal information) that we hold about you, 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

...ing wrong with the information we hold about you and we'll

\*See Footnote 5

- inaccurate;
- out of date;
- incomplete;
- irrelevant; or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction.

### **What additional things do we have to do to correct your credit information?**

If you ask us to correct credit information, we will help you with this in the following way.

#### Helping you manage corrections

We are required to help you ask for your credit information to be corrected.

#### Where we correct information

If we're able to correct the information, we'll let you know within five business days of deciding to do this. We'll also let the relevant third parties know as well as any others that may be affected. If there are any instances where we can't do this, then we'll let you know in writing.

#### Where we can't correct information

If we're unable to correct your information, we'll explain why in writing within five business days of making this decision. If you have any concerns, you can access our external dispute resolution scheme or make a complaint to the Office of the Australian Information Commissioner.

### **Time frame for correcting information**

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that's been agreed to by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter;
- ask you to agree in writing to give us more time; and
- let you know you can complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

## **What if you want to interact with us anonymously or use a pseudonym?**

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way however as we are often

governed by strict regulations that require us to know who we're dealing with. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable; or
- we are required or authorised by law or a court/tribunal order to deal with you personally.

## What do we do with government-related identifiers?

In certain circumstances we may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.

## How do you make a complaint?

### How do you generally make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you.

You can contact us by using the details below:

The Privacy Officer

Better Mortgage Management Pty Ltd

PO Box 274 Spring Hill Qld 4004

*Email:* [info@bettermm.com.au](mailto:info@bettermm.com.au)

*Fax:* **(07) 3831 6500**

### Further Options

If you are dissatisfied with the response of our complaints officer you may make a complaint to our External Dispute Resolution Scheme, Australian Financial Complaints Authority, which can be contacted on 1800 931 678 or [www.afca.org.au](http://www.afca.org.au)

### Need more help?

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:

- **Online:** [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)
- **Phone:** 1300 363 992
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- **Fax:** +61 2 9284 9666
- **Mail:** GPO Box 5218 Sydney NSW 2001 or GPO Box 2999 Canberra ACT 2601

## What additional things do we have to do to manage your complaints about credit information?

### If your complaint relates to how we handled your access and correction requests

You may take your complaint directly to our external dispute resolution scheme or the Office of the Australian Information Commissioner. You are not required to let us try to fix it first.

### For all other complaints relating to credit information

If you make a complaint about things (other than an access request or correction request) in relation to your credit information, we will let you know how we will deal with it within seven days.

### Ask for more time if we can't fix things in 30 days

If we can't fix things within 30 days, we'll let you know why and how long we think it will take. We will also ask you for an extension of time to fix the matter. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

**Letting you know about our decision**

We'll let you know about our decision within 30 days or any longer agreed time frame. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

**Contact details for Credit Reporting Bodies and Credit Providers**

As outlined above, if you apply for credit or have a credit facility with us, we may give your personal and/or credit information to one or more credit reporting bodies. The contact details of the credit reporting bodies and credit providers we may use are outlined below. Each credit reporting body and credit provider has a credit reporting policy and privacy policy about how they handle your information. You can obtain copies of these policies at their websites.

**Veda Advantage Business Information Services Ltd**

- **Online:** [www.mycreditfile.com.au](http://www.mycreditfile.com.au)
- Veda Advantage's credit reporting policy is set out at <http://www.veda.com.au/privacy>
- **Mail:** Attention: Public Access Division Veda Advantage  
PO Box 966 North Sydney NSW 2059

**Adelaide Bank a Division of Bendigo and Adelaide Bank Limited ABN 11 068 049 178 (ACL 237879)**

- **Online:** [www.adelaidebank.com.au/](http://www.adelaidebank.com.au/)
- **Privacy Policy:** [www.adelaidebank.com.au/Privacy-policy/Privacy-and-Credit-reporting-policies](http://www.adelaidebank.com.au/Privacy-policy/Privacy-and-Credit-reporting-policies)
- **Mail:** 80 Grenfall Street, Adelaide 5000

**Advantagedge Financial Services Holdings Pty Ltd ABN 75 095 300 502**

- **Online:** [www.advantedge.com.au/](http://www.advantedge.com.au/)
- **Privacy Policy:** [www.advantedge.com.au/privacy/default.htm](http://www.advantedge.com.au/privacy/default.htm)
- **Mail:** Level 10, 101 Collins Street Melbourne VIC 3000

**Advantagedge Financial Services Pty Ltd ABN 36 130 012 930**

- **Online:** [www.advantedge.com.au/](http://www.advantedge.com.au/)
- **Privacy Policy:** [www.advantedge.com.au/privacy/default.htm](http://www.advantedge.com.au/privacy/default.htm)
- **Mail:** Level 10, 101 Collins Street Melbourne VIC 3000

**AFSH Nominees Pty Ltd ABN 51 143 937 437**

- **Online:** [www.advantedge.com.au/](http://www.advantedge.com.au/)
- **Privacy Policy:** [www.advantedge.com.au/privacy/default.htm](http://www.advantedge.com.au/privacy/default.htm)
- **Mail:** Level 10, 101 Collins Street Melbourne VIC 3000

**Firstmac Limited ABN 59 094 145 963**

- **Online:** [www.firstmac.com.au/](http://www.firstmac.com.au/)
- **Privacy Policy :** [www.firstmac.com.au/privacy-policy](http://www.firstmac.com.au/privacy-policy)
- **Mail:** Level 40, 123 Eagle Street, Brisbane QLD 4000

**First Title Australia Pty. Ltd. ABN: 64 075 279 908**

- **Online:** [www.firsttitle.com.au](http://www.firsttitle.com.au)
- **Privacy Policy:** [www.firsttitle.com.au/property-owners/copyright-copy-first-title-privacy-policy](http://www.firsttitle.com.au/property-owners/copyright-copy-first-title-privacy-policy)
- **Mail:** Level 11 175 Castlereagh Street Sydney NSW 2000

**Genworth Financial Mortgage Insurance Pty Ltd ABN 60 106 974 305**

- **Online:** [www.genworth.com.au/](http://www.genworth.com.au/)
- **Privacy Policy:** [www.genworth.com.au/privacy-policy](http://www.genworth.com.au/privacy-policy)
- **Mail:** Level 26, 101 Miller Street North Sydney NSW 2060

**La Trobe Financial Asset Management Limited ACN 007 332 363**

- **Online:** [www.latrobefinancial.com.au/](http://www.latrobefinancial.com.au/)
- **Privacy Policy:** [www.latrobefinancial.com.au/Home/PrivacyCharter](http://www.latrobefinancial.com.au/Home/PrivacyCharter)
- **Mail:** Level 25, 333 Collins Street Melbourne VIC 3000

**Liberty Financial Pty Ltd ABN 55 077 248 983**

- **Online:** [www.liberty.com.au/](http://www.liberty.com.au/)

- **Privacy Policy:** [www.liberty.com.au/liberty/disclosures](http://www.liberty.com.au/liberty/disclosures)
- **Mail:** Level 16, 535 Bourke St Melbourne VIC 3000

**MKM Capital Pty. Ltd.**

- **Online:** [www.mkmcapital.com.au/](http://www.mkmcapital.com.au/)
- **Privacy Policy:** [www.mkmcapital.com.au/about/privacy-policy](http://www.mkmcapital.com.au/about/privacy-policy)
- **Mail:** Suite 1403 1 Queens Road Melbourne VIC. 3004

**Pepper Finance Corporation Limited ABN: 51 094 317 647**

- **Online:** [www.pepperonline.com.au/](http://www.pepperonline.com.au/)
- **Privacy Policy:** [www.pepperonline.com.au/Privacy](http://www.pepperonline.com.au/Privacy)
- **Mail:** P.O. Box 6186 North Sydney NSW 2060

**Pepper Australia Pty Limited ABN 55 094 317 665**

- Online: [www.pepperonline.com.au/](http://www.pepperonline.com.au/)
- Privacy Policy: [www.pepperonline.com.au/Privacy](http://www.pepperonline.com.au/Privacy)
- Mail: P.O. Box 6186 North Sydney NSW 2060

**Pepper Homeloans Pty Limited ABN 86 092 110 079**

- Online: [www.pepperonline.com.au/](http://www.pepperonline.com.au/)
- Privacy Policy: [www.pepperonline.com.au/Privacy](http://www.pepperonline.com.au/Privacy)
- Mail: P.O. Box 6186 North Sydney NSW 2060

**Perpetual Trustee Company Limited ACN 000 001 007**

- Online: [www.perpetual.com.au/](http://www.perpetual.com.au/)
- Privacy Policy: [www.perpetual.com.au/privacy-policy.aspx](http://www.perpetual.com.au/privacy-policy.aspx)
- Mail: Level 12, 123 Pitt Street Sydney NSW 2000

**QBE Lenders Mortgage Insurance Limited, ABN 70 000 511 071**

- Online: [www.qbelmi.com/](http://www.qbelmi.com/)
- Privacy Policy: [www.qbelmi.com/pg-QBE-Privacy-Policy-Statement.seo](http://www.qbelmi.com/pg-QBE-Privacy-Policy-Statement.seo)
- Mail: Level 23/50 Bridge Street SYDNEY NSW 2000

**Redzed Lending Solutions Pty Ltd ABN 31 123 588 527**

- Online: [redzed.com/](http://redzed.com/)
- Privacy Policy: [redzed.com/?m=contents&cmsvar=privacypolicy&option=-1](http://redzed.com/?m=contents&cmsvar=privacypolicy&option=-1)
- Mail: GPO Box 1693 Melbourne VIC 3000

**Resimac Ltd ABN 67 002 997 935**

- Online: [www.resimac.com.au/](http://www.resimac.com.au/)
- Privacy Policy: [www.resimac.com.au/sections/legal/privacy.aspx](http://www.resimac.com.au/sections/legal/privacy.aspx)
- Mail: Level 9, 45 Clarence St Sydney NSW 2000

**Secure Funding Pty Ltd ABN 25 081 982 872**

- Online: [www.liberty.com.au/](http://www.liberty.com.au/)
- Privacy Policy: [www.liberty.com.au/liberty/disclosures](http://www.liberty.com.au/liberty/disclosures)
- Mail: Level 16, 535 Bourke St Melbourne VIC 3000

**Sintex Consolidated Pty Ltd ABN 75 065 917 535**

- Online: [www.sintex.com.au/](http://www.sintex.com.au/)
- Privacy Policy: [www.sintex.com.au/files/online-privacy](http://www.sintex.com.au/files/online-privacy)
- Mail: Level 1, 458 Wattle Street Ultimo NSW 2007

**Subrosa Group Pty Ltd (IBN Direct) ABN 87 160 526 750**

- Online: <http://ibndirect.com/>
- Privacy Policy: [ibndirect.com/privacy/](http://ibndirect.com/privacy/)
- Mail: PO Box 1441 Caloundra QLD 4551

**Think Tank Group Pty Ltd ABN 75 117 819 084**

- Online: <http://thinktank.net.au/>
- Privacy Policy: <http://thinktank.net.au/about-us/privacy-policy/>
- Mail: PO Box 6125 North Sydney NSW 2059

## Contact credit reporting bodies if you think you have been the victim of a fraud

If you believe that you have been or are likely to be the victim of fraud (including identity fraud), you can request a credit reporting body not to use or disclose the information they hold about you. If you do this, the credit reporting body mustn't use or disclose the information during an initial 21 day period without your consent (unless the use or disclosure is required by law). This is known as a **ban period**.

If, after the initial 21 day ban period, the credit reporting body believes on reasonable grounds that you continue to be or are likely to be the victim of fraud, the credit reporting body must extend the ban period as they think reasonable in the circumstances. The credit reporting body must give you a written notice of the extension.

## Contact credit reporting bodies if you don't want your information used by them for direct marketing/pre-screening purposes.

Credit reporting bodies can use the personal information about you that they collect for a pre-screening assessment at the request of a credit provider unless you ask them not to. A pre-screening assessment is an assessment of individuals to see if they satisfy particular eligibility requirements of a credit provider to receive direct marketing. You have the right to contact a credit reporting body to say that you don't want your information used in pre-screening assessments. If you do this, the credit reporting body must not use your information for that purpose.

## Contact us

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by using the details below:

The Privacy Officer

Better Mortgage Management Pty Ltd

PO Box 274 Spring Hill Qld 4004

*Email:* info@bettermm.com.au

*Fax:* **(07) 3831 6500**

## Changes to this Privacy Policy

We are constantly reviewing all of our policies and attempt to keep up to date. As a consequence we may change this Privacy Policy from time to time or as the law requires it.

This Privacy Policy was last updated in **May 2014**

**Footnotes:**

- 1 *Consumer credit is credit that is intended to be used wholly or primarily:*
  - *for personal, family or household purposes; or*
  - *to acquire, maintain, renovate or improve residential property for investment purposes or to refinance credit for any of these purposes.*
- 2 *Consumer credit liability information and repayment history information: These information types can only be provided to credit reporting bodies on and after 12 March 2014 in connection with a consumer credit facility.*
- 3 *Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.*
- 4 *Other ways we use your information*
  - *giving you information about a product or service;*
  - *considering whether you are eligible for a product or service;*
  - *processing your application and providing you with a product or service;*
  - *administering the product or service we provide you, which includes answering your requests and complaints, varying products and services and managing our relevant product portfolios;*
  - *identifying you or verifying your authority to act on behalf of a customer;*
  - *telling you about other products or services that may be of interest to you, or running competitions and other promotions (this can be via email, telephone, SMS, iM, mail, or any other electronic means including via social networking forums), unless you tell us not to;*
  - *assisting in arrangements with other organisations in relation to a product or service we make available to you;*
  - *allowing us to run our business and perform administrative and operational tasks, such as:*
  - *training staff;*
  - *developing and marketing products and services;*
  - *risk management;*
  - *systems development and testing, including our websites and other online channels;*
  - *undertaking planning, research and statistical analysis;*
  - *determining whether a beneficiary will be paid a benefit;*
  - *preventing or investigating any fraud or crime, or any suspected fraud or crime;*
  - *as required by law, regulation or codes binding us; and*
  - *for any purpose for which you have given your consent.*
- 5 *Credit eligibility information is credit information about you that we've got from credit reporting bodies or based on that information*