



Privacy Policy & Credit Reporting Policy

Think Tank Group of Companies (“Think Tank” or the “Company”)

This policy sets out how Think Tank Group Pty Ltd ABN 75 117 819 084 and Think Tank Nominees Pty Ltd ACN 63 133 763 452 deal with your personal information including credit related personal information. A reference to “We” or “us” in this policy includes Think Tank Group Pty Ltd and Think Tank Nominees Pty Ltd and all or any of their related bodies corporate.

In this policy “Credit Providers” means us as well as any introducer, dealer or broker referred to in a loan application, any person assisting in processing a loan application and other entities involved in the funding, loan servicing or securitisation of loans including BNY Trust Company of Australia Limited.

We are committed to compliance with the Privacy Act 1988 (Cth) (**Privacy Act**), the Privacy (Credit Reporting) Code and the Australian Privacy Principles This policy contains information about how we look after your personal information generally as well as specific details as to how we look after your credit-related personal information.

Personal Information

Personal information is information or opinion whether true or not and whether recorded in a material form or not about an individual whose identity is apparent or can be reasonably ascertained from information or opinion eg name, contact details, tax file number, employment information, investment information etc. It includes credit-related personal information.

What is credit-related personal information?

Credit-related personal information is credit information, credit eligibility information and related information.

Credit information relates to your credit and includes;

- identification details;
- consumer credit liability information;
- loan repayment history information;
- a statement of information requested that has been made in relation to you by a credit provider, mortgage insurer or trade insurer or credit reporting body;
- the type of credit, amount of credit sought in an application that has been made by you to a credit provider;
- default information about you;
- payment information about you;
- new arrangement information about you;
- personal solvency information about you;

- publicly available information about including past and present company directorships and share and business ownerships;
- court proceedings information; and/or
- serious credit infringements.

Credit eligibility information means credit reporting information about an individual that has been obtained from a credit reporting body or information that has been derived from that information.

How do we collect personal information?

We generally collect personal information (including credit related personal information) via or in the course of applications for one of our products which may be submitted either directly to us through our website or by paper application, through one of our representatives or via an intermediary. We also receive personal information from third parties such as referees, employers, other credit providers, finance brokers, other third parties and credit reporting bodies as well as publicly available information from websites and social media.

What kind of information do we collect?

We will only collect personal information relevant to our business activities. This may include information received when an application is made for products or services or a request for information about our products or services is made, an application for a position with us is received or a response to a survey or feedback about our services is received.

To comply with our obligations under *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and other legislation, we are required to collect your personal information to confirm your identity.

Information we collect and store includes:

- names, gender and date of birth;
- addresses, phone numbers, email addresses;
- information regarding credit worthiness;
- financial information including credit history information in respect of credit provided by us or other credit providers;
- other information about your credit worthiness or suitability to be a guarantor including credit scores;
- information about overdue credit facilities or other infringements;
- investment information;
- bank account details;
- employment details and history;
- family details;
- communications between us and your representatives;
- information about credit related court proceedings and personal insolvency information.

How will we use your personal information?

We use personal information to:

- assist you with queries;
- comply with legal or regulatory obligations imposed upon us;

- processing applications for products and services;
- managing loans or other products provided to you including management of overdue loan payments;
- managing customer relationships including product development feedback or other surveys, statistical or research purposes;
- investigation of complaints;
- promotion and direct marketing;
- participate in the credit reporting system and provide information to credit reporting bodies and assist other credit providers;
- internal operations including securitisation, audits, record-keeping, file reviews and portfolio analysis; and
- fraud prevention measures or for a purpose disclosed to you where we have obtained your consent.

Our use of your personal information may involve disclosure of it to organisations that carry out functions on our behalf. This includes legal and other professional advisers, valuers, introducers, debt collection agencies, mortgage insurers, trade insurers, loan processing, organisations and loan management organisations, entities involved in the funding, loan servicing or securitisation of your loan including without limitation BNY Mellon Australia, credit reporting agencies including without limitation the credit reporting bodies referred to below, information technology providers, potential or actual purchasers of all or part of our loan book or other assignees and government authorities including law enforcement agencies.

We may also give guarantors, mortgagors or joint borrowers or a person who is considering becoming a guarantor, mortgagor or joint borrower information about you for the purpose of enabling that person to decide whether to be a guarantor, mortgagor or joint borrower informed about the conduct of the relevant loan.

What are credit reporting bodies?

Credit reporting bodies are bodies that collect information about individuals give reports to credit providers about their credit activities to assist credit providers in deciding whether to provide finance. If you apply for credit or agree to be a guarantor or are a director of a company that applies for credit or agrees to become a guarantor, we may disclose your information to a credit reporting body or collect information from a credit reporting body. We currently use the following credit reporting bodies:

- Equifax
PO Box 964,
North Sydney NSW
T: 1300 762 207
www.mycreditfile.com.au
- Illion
PO Box 7405,
St Kilda Melbourne;
T: 1300734806
www.illion.com.au/#illion-for-individuals
- Experian
PO Box 1969 North Sydney
T:1300 783 684
www.experian.com.au/consumer-services

You have the right to:

- access information about you held by a credit reporting body;
- ask a credit reporting body to correct information about you that is incorrect.
- request that a credit reporting body not use information about you for pre-screening or marketing by us or other credit providers; and
- request that a credit reporting body not use or disclose your credit reporting information if you have reasonable grounds to believe that you are or are likely to be a victim of fraud.

Each credit reporting body has a policy about how it manages credit related personal information. You may access this policy by contacting them using the details set out above.

How will we use credit-related information?

We may collect, hold, use and disclose your credit-related information in order to assess and process applications for credit, manage loans including collecting overdue payments, managing our relationship with you including product development, feedback or other surveys, statistical research purposes, investigation of complaints, promotion and direct marketing, assess or assist with hardship requests, compliance with regulatory requirements including the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and other legislation, internal operations including securitisation audit, record-keeping, file reviews and portfolio analysis or on transfer of loans to other parties, for purposes otherwise permitted by law or for any purpose disclosed to you where we have obtained your consent, fraud prevention measures, dealing with complaints.

We may obtain credit-related information from you from a credit reporting body to assist us in managing your credit including in assessing loan applications, collection of overdue payments and for securitisation purposes.

We may disclose your credit-related information to credit reporting bodies including disclosure that you are in default under a credit agreement or have committed a serious credit infringement if this is the case.

Credit reporting bodies may include information provided by us in reports provided to other credit providers to assist them in assessing your credit worthiness.

Disclosure to overseas recipients

Our business is operated only in Australia. However, in some cases your personal information may be disclosed to organisations overseas including without limitation the United States, countries in the European Union and India.

Overseas organisations may be required to disclose information shared with them under a foreign law.

Accessing your Information and Correction of your Information

You can request access to your personal information at any time by contacting Think Tank's Compliance Officer, details of which are set out at the end of this statement. We will respond to a request for access to your personal information within a reasonable time. If we are going to refuse to

give you access to your personal information, we must provide reasons for refusal and details of the relevant provision of the *Privacy Act* which entitles us to refuse access.

We will also take reasonable steps to amend or correct your personal information if you advise us that the information that we hold is inaccurate.

Storage of Personal Information

We may store your information in cloud or other types of network or electronic storage and will take reasonable steps to ensure appropriate security arrangements in place if this is the case. Such storage may be accessed from various countries by an internet connection hence it is not always possible to know in which country your information may be accessed or held.

Credit Providers

If you have signed a privacy consent form you will be taken to have also authorised any Credit Providers who have an interest in your loan or any loan where you are a guarantor, mortgagor or joint borrower to, collect, hold and use your information in the manner specified in this policy.

Restricting Disclosure for Pre-Screening for Direct Marketing or in the case of Fraud

Credit reporting bodies offer a service to credit providers who wish to send direct marketing material about credit services to individuals. You have a right to request that a credit reporting body not use information about you for pre-screening or marketing by us or other credit providers. If you wish to do this you can contact the credit reporting body and request this, using the contact details set out above.

Also, you have the right to request that a credit reporting body not use or disclose your credit reporting information if you have reasonable grounds to believe that you are or are likely to be a victim of fraud.

Contacting us or making complaints

If you have any questions about this policy, how we manage your personal information or concerns about the way we manage your personal information you can contact us as follows:

The Compliance Officer
Think Tank Group Pty Ltd
PO Box 6125
NORTH SYDNEY NSW 2059

Telephone: 1300 781 043
Email: compliance@thinktank.net.au

If you are not satisfied with how a complaint or concern has been addressed by us, you can refer your complaint to the Australian Financial Complaints Authority – contact details set out below:

Australian Financial Complaints Authority
Website: www.afca.org.au
Email: infor@afca.org.au
Telephone: 1800 931 678
Mail: GPO Box 3 Melbourne VIC 3001

You can also refer your complaint or concern to the Office of the Australian Privacy Commissioner – contact details set out below:

Office of the Australian Privacy Commissioner

Website: www.oaic.gov.au

Email: enquiries@oaic.gov.au

Telephone: 1300 363 992

Mail: GPO Box 5218, Sydney NSW 2001

Changes to this Policy

We make changes to this privacy policy and credit reporting Policy from time to time for any reason. Changes will be notified by posting an amended version of this policy on our website

Think Tank Group

June 2020

Version	1.4
Date of Issue	10 th February, 2014
Last Review	8 June 2020