

BENNETTO FINANCE

PRIVACY POLICY

1. Purpose

Bennetto Finance Pty Ltd (“Bennetto Finance”) recognises the importance of protecting the privacy of individuals with respect to their Personal Information. The purpose of this document is to outline the way in which we will comply with our obligations regarding the handling of your Personal Information under the *Privacy Act 1988* (Cth) and in accordance with the Australian Privacy Principles (“APPs”).

2. What is Personal Information?

This Privacy Policy describes how we will manage your Personal Information. Generally, Personal Information is any information or opinion about an identified individual, or an individual who is reasonably identifiable. This includes any opinions about the person, whether true or not, no matter how the information or opinions are recorded.

Certain parts of this Privacy Policy relate to credit information. Section 6 of this Policy sets out how we manage your credit information when we collect your credit information.

3. Personal Information We Collect

Bennetto Finance will only collect Personal Information that is necessary for one or more of its functions or activities.

In order to provide you with comprehensive services, we will (where relevant) require the following Personal Information about you:

- name and/or names used;
- permanent address and postal address if different;
- employment details;
- date of birth;
- Tax File Number (or Exemption). It is optional for clients to provide a Tax File Number or Exemption. However, failure to so will oblige Bennetto Finance to deduct income tax from distributions to the investor;
- details regarding your current financial circumstances, including income assets and liabilities;
- details of your financial needs and objectives;
- details of your investment history and preferences;
- any information relating to your credit worthiness, credit standing, credit history or credit capacity; and
- your aversion or tolerance to risk.

Bennetto Finance will only collect, maintain and use Personal Information about you if it is necessary to adequately provide to you the services you have requested, including:

- making Financial Product recommendations;
- arranging Financial Product transactions on your behalf;
- providing you with finance; and
- all things necessary or incidental to the above.

4. How We Collect Personal Information

Where reasonably practicable, we will collect your Personal Information directly from you. When collecting Personal Information from you, we may collect it in ways including:

- during the initial interview;
- when you complete the application form or loan contract;
- online, via e-mail and via documentation provided to us electronically, in person or by mail.

In some instances, information will be collected from third parties. For example, information may be collected where a client is introduced to Bennetto Finance by a third party i.e. when a Finance Broker submits an application for finance on a client's behalf. Alternatively, information about a director of a corporate client may be obtained from a public record relating to the company.

In any instance, Bennetto Finance will handle all information collected in accordance with this Privacy Policy.

5. Use and Disclosure of Personal Information

Bennetto Finance provides investment and finance services. We will only collect information that is reasonably necessary to perform our services. We generally use or disclose the Personal information collected from you for the purpose for which you provided it and/or for any secondary related purposes which you would reasonably expect or for any other purpose you have consented to.

We may be required to exchange personal information and credit information with the following entities to assess an application for credit and to assist in the ongoing management of that credit, some of which may be located overseas:

- finance brokers, mortgage brokers and persons who assist us to provide our products to you;
- financial consultants, accountants, lawyers and advisers;
- any industry body, tribunal, court or otherwise in connection with any complaint regarding the approval or management of your loan;
- businesses assisting us with funding for loans;
- trade insurers;
- any person where we are required by law to do so;
- any of our associates, related entities or contractors;
- your referees, such as your employer, to verify information you have provided; any person considering acquiring an interest in our business or assets.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this Privacy Policy. Any Personal Information disclosed to an external contractor will be held and used in accordance with this Privacy Policy. If you have any concerns in this regard, please contact us on the Contact Details below.

Where a client nominates someone to act on their behalf, Bennetto Finance may provide Personal Information to that person, for example, the client's accountant or financial adviser.

6. Credit Information

What is credit information?

Credit information about an individual is Personal Information which includes, but is not limited to, the following:

- identification information such as name, address, date of birth and gender;
- consumer credit liability information;
- repayment history information;
- default information;
- court proceedings information; and and personal insolvency information.

What kind of credit information do we collect and why?

When you apply for credit or give a guarantee, Bennetto Finance may collect information from you with respect to your financial position for the purpose of assessing your credit application. The information Bennetto Finance obtains is used to assist us in assessing your creditworthiness, credit standing, and credit history or credit capacity. In some instances, we may collect credit information about you from third parties and other credit providers. For example, we may collect credit reports from credit reporting bodies

Storage and access to your credit information?

Bennetto Finance stores your credit information with your other Personal Information. You can view this information or request to correct it if it is wrong (see Section 9) or a make a complaint to us (see Section 11).

Who do we disclose your credit information to?

We may exchange your credit information with the following credit reporting bodies:

- Equifax Pty Ltd – equifax.com.au
- Tasmanian Collection Service – enquiries@tas.col.com.au

Other matters

You may request a credit reporting body not to use or disclose your personal information if you have reasonable grounds to believe that you have been, or you are likely to be a victim of fraud.

7. Document Storage and Security

Bennetto Finance stores Personal Information electronically and in hard copy. We will take all reasonable steps to secure Personal Information and protect it from misuse, interference or loss, unauthorised access, modification or disclosure. We will destroy or de-identify your Personal Information when it is no longer needed or where we are no longer required by law to retain it (whichever is later).

We have implemented the following measures to protect your Personal Information from misuse, interference, loss, unauthorised access, modification or disclosure:

- all electronic information is protected by maintaining a certified security capable operating system i.e. access is only granted via suitable passwords on each computer;
- all employees are required to comply with Bennetto Finance confidentiality requirements; security measures are required for system access.

8. Access to Personal Information

You may contact Bennetto Finance at any time to request access to the Personal Information we hold about you.

Subject to the exceptions outlined below, Bennetto Finance will provide you with access to your Personal Information either by:

- providing you with copies of the information requested;
- allowing you to inspect the information requested; or
- providing you with an accurate summary of the information held.

Bennetto Finance will **not** give you access to your Personal Information if:

- Bennetto Finance reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- giving access would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious; or
- the information relates to existing or anticipated legal proceedings between Bennetto Finance and you, and would not be accessible by the process of discovery in those proceedings; or
- giving access would reveal the intentions of Bennetto Finance in relation to negotiations with you in such a way as to prejudice those negotiations; or
- giving access would be unlawful; or
- denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- Bennetto Finance has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Bennetto Finance's functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;

- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal evaluative information generated within Bennetto Finance in connection with a commercially sensitive decision-making process.

In the event that Bennetto Finance refuses you access to your Personal Information, we will provide written reasons for making this decision.

9. How to Update your Personal Information

Bennetto Finance will endeavour to ensure that, at all times, the Personal Information that we hold about you is up to date and accurate.

You may request us to correct your Personal Information by contacting us on the Contact Details below. Please provide us with evidence of the incorrect information. We have an obligation to take all reasonable steps to correct Personal Information where we are satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If we do not agree that there are grounds for amendment, then we will add a note to your file stating that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 2 weeks. If your request is urgent, please indicate this clearly.

10. Disclosure to Third Parties

In some circumstances Bennetto Finance will obtain services from other organisations and where necessary (and where the law permits), Personal Information will be provided to those organisations. The services obtained externally by us include information technology support, financial advice, legal advice and compliance advice. External service providers are only authorised to use Personal Information for the purpose for which we supplied it.

We may also be required by law to disclose Personal Information.

Bennetto Finance is required under the Corporations Act to make certain information available for inspection by the Australian Securities and Investments Commission (ASIC) on request to ensure ongoing compliance with licensing and regulatory requirements. This may involve the disclosure of your Personal Information.

11. Complaints for Breach of Privacy

If you wish to make a complaint regarding the handling of your Personal Information, please contact our Manager on the Contact Details provided below. We will endeavour to provide you with a response within 30 days of receipt of your complaint. However, if the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our handling of your complaint or our proposed resolution, you may make a complaint to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can provide you with further information with respect to its complaints process. For more information please visit <https://www.oaic.gov.au>.

12. Changes to Privacy Policy

Bennetto Finance reserves the right to change this Privacy Policy from time to time.

Contact Details

Manager:	Mr Don MacLeod
Address:	Bennetto Finance Pty Ltd Level 7, 152 Macquarie Street Hobart, TAS, 7001
Telephone:	(03) 6224 7474
Mail:	GPO Box 858, Hobart, TAS, 7001
Email:	bennetto@bennetto.com.au