

Privacy and Credit Reporting Policy

Applicability

This BetterWay Financial Solutions Pty Ltd (BetterWay) policy applies to all BetterWay staff and any of its related entities.

All BetterWay Financial Solutions Pty Ltd employees, contractors and suppliers have the responsibility for ensuring that all actions comply with this policy, all regulatory obligations, and in accordance with the BetterWay Financial Solutions Pty Ltd Code of Conduct (the Code).

BetterWay Financial Solutions Pty Ltd are also bound by the Privacy Act 1988 (Act), the Australian Privacy Principles (APP), the Privacy (Credit Reporting) Code 2025 (CR Code) as well as other applicable laws and codes.

If legislative or regulatory conflict arises or requires a higher standard than this Policy or Code, the law or regulation shall prevail.

About this Policy

The purpose of this policy is to outline BetterWay Financial Solutions Pty Ltd's ongoing commitment to ensuring that the privacy of our customers and employees is respected and maintained at all times.

This policy also outlines how BetterWay Financial Solutions Pty Ltd collects, stores, uses, discloses, and protects personal information as required or authorised by law.

What is personal information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

The types of personal information that BetterWay Financial Solutions Pty Ltd collects typically includes:

- name
- contact details (such as address, telephone and email)
- date of birth
- account details
- gender
- marital status and other household information such as number and age of dependents
- occupation and employment information
- financial information such as assets, liabilities, income and expenditure
- complaint details
- involvement as a party in pending and completed legal proceedings

Other types of personal information that BetterWay Financial Solutions Pty Ltd collects primarily relates to credit information. This typically includes:

- identification information
- credit liability information
- credit history
- type and amount of credit
- details of amounts payable and when such amounts are payable
- repayment history, including when payments were made and whether payments were made when due
- default information

Collection of personal information

BetterWay Financial Solutions Pty Ltd collects personal information from various sources. This may include collecting personal information from:

- you (and in some cases, your family, friends or other third-party associates)
- your authorised representative (such as your legal or financial adviser)
- other credit providers
- credit reporting bodies
- publically available information

If the personal information relates to a current or former employment relationship between BetterWay Financial Solutions Pty Ltd and the individual, an exemption may apply in relation to your personal information held by us about you as an employee.

We may collect and disclose employee or applicant personal data for the purposes of background screening and pre-employment evaluation. This includes:

- Criminal background checks
- Credit history (if relevant to the position)
- Employment and reference verification

Protecting your personal information

BetterWay Financial Solutions Pty Ltd are committed to ensuring the security of personal information. To this end, we may store information as either a hard copy and/or in electronic form.

Further, we protect personal information from misuse, loss, unauthorised access, modification and disclosure. The steps that we take to protect your personal information include:

- ensuring database security through password protection and secure servers and data storage devices
- encryption of certain records
- staff training on confidentiality
- restricting access of information to authorised personnel only
- maintaining alignment with International Standard ISO27001 Information Security Management

Purpose of Information Collection

BetterWay Financial Solutions Pty Ltd collects personal information that is reasonably necessary for one or more of its core business functions or activities. We collect personal information about you so that we can:

- identify you
- contact you
- respond to your enquiries
- provide you services
- explore options available to you and
- comply with relevant laws and regulations

In certain circumstances, we may also collect sensitive information about you. Sensitive information has a particular meaning under the Act and includes health information. However, we only collect and use sensitive information with your consent and where we are legally authorised to do so.

Unless you otherwise consent or we are otherwise permitted to do so by law, personal information will only be used for the purpose for which it was collected ("the primary purpose") or for a purpose related, or in the case of sensitive information directly related, to the primary purpose ("the secondary purpose").

The main consequences of us not collecting personal information are an inability or delay in being able to identify you, contact you or provide services to you.

BetterWay Financial Solutions Pty Ltd also take reasonable steps to ensure that your personal information is accurate, complete and up to date. This allows us to provide quality services to you. If you believe the information we hold about you is incorrect please write to us at the address listed below.

We do not use your tax file number, pension number, drivers licence number, Australian Business Number, Medicare number or any other government related identifier as an account number or as our own identifier for you. However, we may ask you for one of these identifiers to prove your identity when you deal with us.

Disclosure

BetterWay Financial Solutions Pty Ltd only discloses personal information as authorised or required by law. This may involve disclosing such information to:

- our authorised agents
- our legal advisors
- your authorised representatives
- courts and tribunals
- our service providers where we outsource functions (such as process serving, repossession, employment screening, bulk mailing, information technology maintenance, functionality and support or document storage)
- other persons with your consent

Credit Reporting

BetterWay Financial Solutions Pty Ltd may also disclose certain credit-related personal information to credit reporting bodies. For example, if you fail to meet repayment obligations, we may be entitled to disclose this to a credit reporting body.

When such information is disclosed to a credit reporting body, the credit reporting body may include such information in reports provided to credit providers to assist them in assessing your credit worthiness.

We disclose information to the following credit reporting body:

Equifax Phone: 1300 850 211 Mail: PO Box 964 North Sydney NSW 2059 Web: www.equifax.com.au

You have the right to request the above credit reporting body not to:

- use credit reporting information for the purposes of pre-screening of direct marketing by a credit provider; or
- use or disclose credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

If you would like more information about how credit reporting bodies manage credit related information, you can contact them directly and request a copy of their privacy policy.

Website

Our website uses cookies. A cookie is a small text file that a website may place on your computer or mobile device to remember your preferences. The use of cookies may enable us to identify the pages you access and the prior site you visited. You can set your web browser to refuse cookies, however this may mean that you are unable to use the full functionality of our websites.

Requesting and seeking further information

You may obtain access to (and correction of) your personal information by applying in writing to:

C/o Customer Care BetterWay Financial Solutions Pty Ltd PO Box 59 SANS SOUCI NSW 2219 Email: <u>complaints@betterwayfs.com.au</u>

In some cases, access may be denied as outlined in the Australian Privacy Principles, such as:

- When access poses a threat to individual or public safety
- When it impacts others' privacy
- For legal proceedings or negotiations
- When access is unlawful or required by law
- If the request is frivolous or vexatious

In the event that we refuse to provide you with access to your personal information, we will provide you with an explanation for that refusal.

Depending on the complexity of the information and/or the request, we will respond to access requests within 30 days and inform you of any applicable fees for providing information.

You will not be charged a fee for making a request to access your personal information. However, depending on the type of request, a fee may apply and be charged for providing the information to you.

Any applicable fee will most likely be required to be paid prior to us providing documents or information to you. Information about how any applicable fee is calculated will be provided following receipt of your request.

Further information on privacy in Australia may also be obtained by visiting the website of the Office of the Australian Information Commissioner at <u>www.oaic.gov.au</u>.

Making a Complaint

You may also make a complaint if you believe that we have breached this Privacy Policy, the Act, the APP or the CR Code by contacting:

BetterWay Financial Solutions Pty LtdPhone:1300 996 696 (Option 3)Post:PO Box 59SANS SOUCI NSW 2219Email:complaints@betterwayfs.com.au

We will endeavour to deal with your complaint as soon as is reasonably practicable. If we are unable to satisfactorily resolve your complaint, BetterWay Financial Solutions Pty Ltd is also a member of the Australian Financial Complaints Authority (AFCA) which is an approved External Dispute Resolution Scheme.

AFCA provides an impartial dispute resolution service which is free to consumers and can be contacted by:

Website:	www.afca.org.au
Email:	info@afca.org.au
Phone:	1800 931 678
Post:	GPO Box 3,
	Melbourne VIC 3001

You can also contact the Office of the Australian Information Commissioner by visiting the following website and following the steps listed on the website: www.oaic.gov.au/privacy/privac

This Privacy Policy may be reviewed from time to time and no less than annually. We reserve the right to change our policy at any time. Any revised version of this policy will be published on our website.