

## ABOUT US

'We', 'us' and 'our' refer to Australian Associated Advisers Pty Ltd trading as KeyLend, ABN 36 084 974 694, Australian Credit Licence 392169 and our Lending Advisers.

## OUR COMMITMENT TO PROTECT YOUR PRIVACY

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law.

## WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

When we refer to **personal information** we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. 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 finance (ie loan or lease) and may include any finance that you have outstanding, your repayment history in respect of those loans or leases, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

The kinds of personal information we may collect about you include your name, date of birth, address, account details, occupation, and any other information we made need to identify you.

If you are applying for finance we may also collect 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.

### Why we collect your personal information

We collect personal information for the purposes of providing you with **credit assistance** (ie assessing your application for finance and managing that finance). We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

If you don't provide your information to us, it may not be possible:

- for us to give you the credit assistance you seek from us;
- to assist in finding a loan or lease relevant to your circumstances;
- verify your identity or protect against fraud;
- to let you know about other products or services that might be suitable for your financial needs.

## HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Where reasonable and practical we will collect your personal information directly from you (referred to as **'solicited information'**). For this reason, it's important that you help us to do this and keep your contact details up-to-date.

There are a number of ways in which we may seek information from you. We might collect your information when you fill out a form with us, when you've given us a call or used our website. We may also collect your personal information from finance brokers and other people such as accountants and lawyers.

We also find using electronic means, such as email or SMS, a convenient way to communicate with you. However we'll never ask you for your security details in this way – if you are ever unsure, just contact us.

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

Sometimes, people 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.

## HOW DO WE USE YOUR PERSONAL INFORMATION

We may disclose your personal information:

- to prospective funders or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as finance brokers, lawyers and accountants;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Counter Terrorism Financing Act 2006* (Cth);
- to investors, agents or advisers, or any entity that has an interest in our business;
- organisations that provide products or services used or marketed by us; or
- to your employer, referees or identity verification services.

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.

## Sharing outside of Australia

We may use overseas organisations to help conduct our business. As a result, we may need to share your information with such organisations outside Australia. The countries in which those organisations are located are: India and Philippines.

## Using government identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

## Direct Marketing

From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated. We won't sell your personal information to any organisation.

You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

## 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 may be required to keep some of your information for certain periods of time under law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

## UPDATING YOUR PERSONAL INFORMATION

It is important to us 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, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

## ACCESS AND CORRECTION TO YOUR PERSONAL INFORMATION

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time.

We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we will respond within a reasonable period after receiving your request. 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, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

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

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information at the time of the request. Otherwise, where reasonable, and after our investigation, we will correct your personal information within 30 days.

We may need to consult with other entities as part of our investigation.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

## BUSINESS WITHOUT IDENTIFYING YOU

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 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.

## SENSITIVE INFORMATION

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

## SECURITY 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:

- document storage security policies;
- security measures for access to our systems; and
- only giving access to personal information to a person who is verified to be able to receive that information.

## COMPLAINTS

We are committed to providing our customers with the best possible service. If at any time we have not met our obligations – or you have a complaint about any of our services – please inform us so we can work towards a resolution. We will endeavour to deal with your complaint promptly, thoroughly and fairly.

If you have a complaint, we request you follow these steps:

- In the first instance, please contact the Lending Adviser who provided you with credit assistance.
- If your complaint has not been resolved to your satisfaction within 5 business days, please contact our Compliance Officer as detailed below:

**Telephone:** 08 8210 0000 Monday to Friday 9am to 5pm (AEST)  
**Fax:** 08 8210 0010  
**Email:** [compliance@keylend.com.au](mailto:compliance@keylend.com.au)  
**Mail:** Keylend Compliance, 81 The Parade, Norwood, SA, 5067

- We may ask for additional information and request you to put your complaint in writing to ensure your issue is properly investigated.
- In cases where your complaint will take longer to resolve, we will update you progressively.

If your complaint relates to a product or service acquired through a third party (for example, a lender) we may ask you to contact the relevant third party. They will deal with your complaint under their complaints resolution process.

If you are not satisfied with the resolution of your complaint by the third party under their complaints resolution process, you are entitled to have your dispute considered by the Australian Financial Complaints Authority (AFCA). Please contact AFCA (contact details provided below) for further details.

Our Compliance Officer will acknowledge receipt of your complaint within 5 business days. If unable to resolve the complaint/dispute to your satisfaction within 5 business days, they will write to you advising the procedures we will follow in investigating and handling your complaint.

Within 45 calendar days from the date you lodged the complaint with us, we will write to you advising you the outcome of the investigation and the reason/s for our decision, or if required, we will inform you more time is needed to complete the investigation.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

You may also refer the matter to the Australian Financial Complaints Authority at any time, but if our internal process is still in progress, AFCA may request that our internal process be complete before considering the matter further.

Our external dispute resolution service provider is the Australian Financial Complaints Authority (AFCA), which can be contacted via:

- Telephone: 1800 931 678
- Website: [www.afca.org.au](http://www.afca.org.au)
- Mail: Australian Financial Complaints Authority,  
GPO Box 3, Melbourne VIC 3001
- Email: [info@afca.org.au](mailto:info@afca.org.au)

## FURTHER INFORMATION

### Contact Us

You may request further information about the way we manage your personal information by contacting us on the details below:

- Post: 81 The Parade Norwood SA 5067
- Tel: 08 8210 0000
- Fax: 08 8210 0010
- Email: [lending@keylend.com.au](mailto:lending@keylend.com.au)

### Change in our Privacy Policy

We are constantly reviewing all of our policies and as a consequence we may change this privacy policy from time to time or as the need arises. We will let you know of any changes to this Privacy Policy by posting a notification on our website or you may contact us for a copy of the most up to date policy at any time.

This Privacy Policy came into existence on 12 March 2014.