

## Privacy Policy

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. 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.

### Personal information

When we refer to **personal information** we mean information from which your identity is apparent. This information may include information or an opinion about you, from which your identity can reasonably be ascertained.

### Why we collect your personal information

Arise Finance may collect, hold, use or disclose your personal information so that we can:

- Verify your identity;
- Provide you with our products and services;
- Administer and manage your loan facility or investment;
- Respond to queries, complaints or to provide customer service;
- Comply with relevant laws, regulations and court orders;
- Train our employees.

If Arise Finance does not collect your personal information, we may not be able to provide you with a product or service.



The product or service that we are providing will determine what information we will collect about you. The kinds of personal information that Arise Finance may collect and hold about you may include: your name, address, contact details, date of birth, citizenship, tax file number, financial position and banking details.

In addition, we may collect personal information about individuals who are business contacts of Arise Finance.

Where sensitive information is collected, stored, used or transferred about you, we will only use this information if you have consented, or in the exercise or defence of a legal claim. Sensitive information is information relating to your racial or ethnic origin, political persuasion, memberships of trade or professional associations or trade unions, sexual preferences, criminal record, or health.

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

The personal information Arise Finance may collect about you will depend on the circumstances of collection, including whether we collect the information from you as a customer, borrower, supplier, contractor, stakeholder or in some other capacity. Information may be collected when you contact us by telephone, email, completion of an application for a loan or investment in a fund, completion of a form, or through our website.

We may collect and receive personal information from our customers or from other business referrers in order to conduct our business or from other third parties such as:

- Your authorised representatives and advisor(s);
- Our service providers;
- Your employer;
- Our corporate clients, where we are providing services to them;
- Referees, in the case of prospective employees;
- Your lawyer or other agents if you authorise us to do so.

### **Cookies and Other Data Collection Technologies**

When Arise Finance's website is visited we collect certain transaction information by automated means, using technologies such as cookies and server logs. Cookies are small text files that websites send to computers or other Internet-connected devices to uniquely identify the browser or to store information or settings in the browser. Cookies allow Arise Finance to recognise the computer when it is used to return. They also help us provide a customised experience and enable us to detect certain

kinds of fraud. Cookie preferences can be managed and the individual can opt out of having cookies and other data collection technologies used by adjusting the settings on their browser.

In many cases, the information Arise Finance collects using cookies and other tools is only used in a non-identifiable way, without any reference to personal information. For example, Arise Finance uses information it collects about all website users to optimise its website and to understand website traffic patterns.

In some cases, Arise Finance does associate the information it collects using cookies and other technology with personal information. This Privacy Policy applies to the information when we associate it with the personal information.

### **Why do we collect repayment history information?**

We will collect repayment history information about you in relation to payments falling due on or after 1 December 2012 in relation to our receivables servicing business. We can disclose this information to credit reporting bodies from 12 March 2014. Repayment history information includes information about when repayments are due and whether they have been made, but does not include the amount of repayments.

### **How safe and secure is your personal information that we hold?**

The security of your personal information is important to us and we will take reasonable steps to protect your personal information by storing it in a secure environment. When the information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified.

We will also take reasonable steps to protect any personal information from misuse, loss, unauthorised access, modification or disclosure.

Access to personal information held by Arise Finance is controlled to prevent misuse or unauthorised disclosure of the information. We utilise a range of technical security measures such as secure authentication, password controls, encryption, firewalls and anti-virus technology to prevent unauthorised access to your information.

### **To whom will we disclose your personal information?**

Arise Finance does not sell, rent or trade personal information to, or with, third parties.

Where possible, we will inform you, at or before the time of collecting your personal information, the types of organisations that we intend to disclose your personal information to.

In some circumstances your information may be disclosed to Arise Finance's related entities or service providers that perform a range of services on our behalf or are associated with the management of your loan facility, investment and related products and services.

Examples include:

- Organisations involved in providing, managing and administering products and services such as loan servicers, trustees, trust managers, custodians, fund and investment administrators/managers, external dispute resolution services;
- Mortgage intermediaries such as mortgage brokers, mortgage originators and mortgage managers;
- Professional service firms that provide services to us such as lawyers and auditors;
- Software providers such as our database licensors;
- Companies and contractors that provide IT services to us such as storage facilities;
- Credit reporting agencies;
- Lender's mortgage insurers;
- Registry and platform providers;
- Valuers;
- Collection agencies and other loan intermediaries;
- Mailing houses and printing companies;
- Other consultants or advisers appointed by us.

We may also disclose your personal information to your employer/s or referees, your guarantors, your financial advisors, your bank and any other organisation that may have or is considering having an interest in your loan or investment, or in our business.

Where we disclose your information to our service providers, we will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by Arise Finance.

We may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements.

We may also disclose your personal information to other third parties and for other purposes with your consent. That consent may be written, verbal or implied from your conduct.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case-by-case basis. Prior to disclosing any of your

personal information to another organisation, we will take all reasonable steps to satisfy ourselves that disclosure:

- Is for a purpose known to you;
- Is for a purpose you would reasonably expect;
- Is for a purpose required or permitted by law (for example, in response to a request or in response to a subpoena to a court or tribunal or to the Australian Taxation Office);
- Is otherwise for a purpose authorised by you, and
- Is to an organisation that has a commitment to protecting your personal information at least equal to our commitment.

We will endeavour not to transfer your personal information outside Australia however there may be circumstances where it is necessary to do so, such as when using cloud storage and IT servers that are located offshore. In these cases we will take all reasonable steps to satisfy ourselves that the other country has privacy laws substantially similar to those of Australia, unless the disclosure is required by law.

### **Accessing and updating your personal information**

It is important to our relationship that the personal information we hold about you is accurate and up to date. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete. You may contact us at any time to request access to the personal information we hold about you. You may also ask us to correct information about you that you believe to be inaccurate, incorrect or out of date.

You may request access to any of the personal information we hold about you at any time. We may charge a reasonable fee to cover our costs in retrieving and supplying the information to you.

We will need to verify your identity before giving you access or correcting your information.

There may be some situations where we are not able to correct or provide you with access to your personal information. In these circumstances an explanation will be provided to you to explain the reasons why.

### **Dealing with us anonymously**

In most circumstances it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information.

### **Further enquiries or complaints**

You may request further information about the way we manage your personal information by writing or emailing.

Mail: Privacy Officer  
Arise Finance  
Level 9, 9 Castlereagh Street SYDNEY NSW 2000

Or by email: [Privacy.Officer@amal.com.au](mailto:Privacy.Officer@amal.com.au)

You can also contact us by telephoning 1300 720 452.

If you believe that we have breached the Australian Privacy Principles by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are set out above.

The Privacy Officer will respond to your complaint within 30 days of its receipt.

In the event that the Privacy Officer is unable to resolve your complaint, you may apply to the Office of the Australian Information Commissioner (OAIC) or access the Australian Financial Complaints Authority (AFCA) an external dispute resolution service to have your complaint heard and determined. The Commissioner may be contacted on the privacy hotline 1300 363 992 and AFCA may be contacted on 1800 931678.

### **Change in our Privacy Policy**

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practice.

As a consequence we may change this Privacy Policy from time to time or as the need arises.