



## PRIVACY POLICY

AMAL Asset Management Limited ("AMAL") aims to provide the best possible service to its customers.

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.

We recognise that any personal information we collect about you will only be used for the purposes indicated in our policy. It is important to us that you are confident that any personal information we collect from you or is received by us will be treated with appropriate respect ensuring 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.

### **Who is AMAL Asset Management Limited?**

AMAL Asset Management Limited is a Business Process Outsourcing (BPO) organisation which provides loan receivable services to financial institutions.

AMAL specialises in BPO services, including Loan Servicing and Trust Management services, for investment portfolios over a number of asset classes including commercial and residential mortgages, equipment lease receivables, consumer receivables and managed investment schemes.

### **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**

We collect and receive personal information from our customers or from other business referrers in order to conduct our business; being the ongoing servicing of loan receivables. From time to time we may offer other products and services.

We also collect, use and disclose your personal information:

- To verify your identity;
- To administer and manage your loan facility;
- To respond to queries, complaints or to provide customer service;
- To comply with laws and regulation requirements such as anti-money laundering;
- To train our employees.

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

Where reasonable and practical we will collect your personal information only directly from you, your credit provider or from third parties such as your financial adviser, lawyer or other agents if you authorise us to do so.

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

When AMAL's website is visited or our mobile applications are used, AMAL collects certain transaction information by automated means, using technologies such as cookies and server logs.

For example, when AMAL's website is visited, AMAL places cookies on the individual's computer. 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 AMAL to recognise the computer when it is used to return. They also help AMAL provide a customised experience and enable AMAL to detect certain kinds of fraud. In many cases, 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. All browsers are different, so the "help" section of the browser should be consulted to learn about cookie preferences and other privacy settings that may be available.

AMAL collects many different types of information from cookies and other technologies. For example, AMAL may collect information from the device used to access AMAL's website, the operating system type, browser type, domain, and other system settings, as well as the language the system uses and the country and time zone where the device is located. AMAL's server logs also record the IP address assigned to the device used to connect to the Internet. An IP address is a unique number that devices use to identify and communicate with each other on the Internet. AMAL may also collect information about the website visited before the individual came to AMAL and the website visited after they leave AMAL's site.

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

In some cases, AMAL does associate the information it collects using cookies and other technology with personal information. This privacy statement applies to the information when we associate it with the personal information.

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

We collect repayment history information about you in relation to payments falling due on or after 1 December 2012. 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.

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

Where possible, either AMAL or your credit provider 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.

We may disclose your personal information to other organisations associated with the management of your loan facility and related products and services. The types of organisations to which we are likely to disclose information about you include:

- Your credit provider, funder, lender, financial institution, securitisers, mortgage intermediaries such as mortgage brokers, mortgage originators and mortgage managers);
- Professional service firms that provide services to us such as lawyers and auditors;
- Companies and contractors that provide IT services to us such as storage facilities;
- Credit reporting agencies;
- Lenders mortgage insurers;
- Valuers;
- Collection agencies and other loan intermediaries.

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 in our business.

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. The countries to which we may send personal information include New Zealand, the United Kingdom and the United States.

### **Direct marketing**

From time to time we may use your personal information to provide you with current information about mortgage loans, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting our offices by telephoning 02 9230-6700 or by writing to us at Level 6, 9 Castlereagh Street, Sydney NSW 2000. 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.

### **Updating your personal information**

It is important to our relationship that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we will 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 assist us in informing us if the information we hold about you is inaccurate or incomplete.

### **Access to your personal information**

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

To access personal information that we hold about you use the contact details specified above. We may charge a fee for our costs in retrieving and supplying the information to you.

### **Denied access to personal information**

There may be some situations where we are not required to provide you with access to your personal information. For example, such a situation would be information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious.

An explanation will be provided to you, if we deny you access to your personal information we hold.

## **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. Such a situation would be where you make general inquiries about interest rates or current promotional offers.

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 in trade or professional association or trade unions, sexual preferences, criminal record, or health.

## **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, and 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 and unauthorised access, modification or disclosure.

## **Further information**

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

## **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.

AMAL is a member of the Mortgage & Finance Association of Australia (MFAA) and as such we abide by the association's Code of Practice and governance guidelines to assure consumers that they can have confidence when dealing with our company.

We are proud of our customer service culture and make every effort to ensure that our customers are satisfied with the service they receive. However should our customers feel that our service is not what it should be, we want to hear about it and resolve any issues.

We undertake to reply promptly to you once we are in receipt of any suggestion or complaint. In relation to complaints, we will always try to resolve the dispute.

Should you have a suggestion or wish to make a complaint you can:

- Call us on +61 2 9230 6700 and ask for the Quality Manager.
- E-mail us at [QualityManager@amal.com.au](mailto:QualityManager@amal.com.au).
- Write to us at Level 6, 9 Castlereagh Street, Sydney NSW 2000.
- Fax us on +61 2 9210 2700.
- Or speak to any representative of our business, who will refer you to the Quality Manager if they are unable to assist you personally.

If we do not reach agreement on your complaint, you can refer certain matters to the Credit Ombudsman, who can investigate and resolve disputes of up to \$250,000. This service is free to you. You can lodge your complaint by phone, fax or mail.

**Credit Ombudsman Service Limited**

PO Box A252 Sydney South NSW1235

Level 7, 287 Elizabeth Street

Sydney NSW 2000

Phone: 1800 138 422 or 02 9273 8400

Fax: 02 9261 2798

Email: [info@creditombudsman.com.au](mailto:info@creditombudsman.com.au)

Website: [www.creditombudsman.com.au](http://www.creditombudsman.com.au)