



## Privacy Policy & Credit Reporting Policy

This document contains:

Privacy Policy

Credit Reporting Policy

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We, OurMoneyMarket Holdings Pty Ltd (**'OurMoneyMarket Holdings'**) ABN 30 614 872 105, OurMoneyMarket Operations Pty Ltd (**'OurMoneyMarket Operations'**) ABN 43 640 771 535; OurMoneyMarket Lending Pty Ltd (**'OurMoneyMarket Lending'**) ABN 64 605 231 669, OurMoneyMarket Pty Ltd (**'OurMoneyMarket PL'**) ACN 616 335 409, and OurMoneyMarket Services Pty Ltd (**'OurMoneyMarket Services'**) ABN 66 614 874 761 (together '**OMM**'), collect, use and handle your personal information in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**), specifically the Australian Privacy Principles. We collect, use and handle your credit information in accordance with Part IIIA of the Privacy Act and the Privacy (Credit Reporting) Code 2014.

This Privacy Policy sets out our policy for the collection, use, disclosure and storage of your personal information, and information relating to your business (where relevant) including your credit-related information.

Use of the terms 'you' or 'your' in this policy means you as an individual or, where you interact with us as a representative of a business, that business. Use of the terms "we", "our" and "us" means, as relevant, OMM.

We may, from time to time, amend and update this policy by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current privacy policy.

## What are personal information and credit-related information?

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

Personal information may include sensitive information, which includes, for example, information about an individual's health, religion and any criminal convictions they may have. The personal information we collect may include:

- name;
- mailing address, street address, email address, telephone number and other contact details;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or indirectly through your use of our website; and
- any other personal information that may be required in order to facilitate your dealings with us.

Credit-related information is a variety of personal information that includes information about your credit history or creditworthiness. It includes:

- information about you or your business' loan experience with us and other lenders;
- consumer credit information;

- commercial credit reports and information;
- the kinds of credit products you have had or sought;
- how you have managed your obligations, including such things as your repayment history, arrears you have cleared;
- information contained in a credit report about you which is obtained by us from a credit reporting body (CRB); and
- information about your creditworthiness that has been derived by us from such a credit report about you.

### Why do we collect information and who do we collect such information from?

We may collect, hold, use and disclose personal information and credit related information about you for a range of purposes, including:

- to identify you in accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth);
- learn about and verify your financial situation in accordance with the National Consumer Credit Protection Act 2009 (Cth);
- for the purposes of considering and assessing an application for credit; and
- managing any credit facility we may provide you.

We may also collect, hold, use and disclose your personal information and credit-related information to:

- identify you and verify that your information is correct;
- inform you about a product or service that we think may be of interest to you;
- assist you to apply for and providing our products or services;
- contact and manage our relationship with you;
- help us design and improve our products and services;
- invite you to marketing events and webinars;
- conduct and enhance our overall business to add more value to you and our customers;
- undertake securitisation activities and other activities relating to funding and capital requirements;
- Compiling statistical data e.g. credit scoring information;
- operate, protect, improve and optimise our website, services and business (e.g. perform analytics, conduct research and for advertising and marketing);
- consider and handle any concerns or complaints you or any other person may have;
- protect our business and our customers from fraudulent or unlawful activity; and
- comply with our legal obligations and resolve any disputes that we may have with any of our customers.



We may, from time to time, use your personal information to let you know about products and services that may be of interest. We may contact you by conducting marketing activities via telephone, email, mail, SMS, instant messenger or other electronic means. We may also market our products to you through third-party channels (such as social networking sites). We may also disclose your personal information to third parties who assist us in providing marketing offers to you. You can let us know if you no longer wish to receive marketing offers by contacting us at 1300 990 115 or email: [info@ourmoneymarket.com](mailto:info@ourmoneymarket.com).

We may, on your behalf, collect information held about you for the purposes of helping you obtain a quote for credit from a credit provider (for example, we may collect information about you to help you obtain a quote for credit from our lending entities).

If you apply for credit, we may collect information about you from third parties (for example, any person who referred you to us, from your employer, service providers, agents, advisers or brokers). We may also collect credit-related information about you from other lenders and Credit Reporting Bodies (“CRB”).

We may also collect information about you from third party social media sources.

We also collect information about your interactions with us (for example, transaction history). We may also use third parties to analyse traffic on our website, which may involve the use of cookies.

If you do not provide some or all of the information which we request, we may not be able to provide credit (or any other product or service) to you.

The Privacy Act protects your sensitive information, such as health information that may be collected on hardship applications. If we need to obtain this information, we will ask for your consent.

## Document Verification Service

The documents and details you provided as evidence of your identity may be checked with the relevant government agency via a Document Verification Service. You can find more information about the Document Verification Service at [www.dvs.gov.au](http://www.dvs.gov.au). Verification of the evidence of identity documentation is necessary for us to perform our functions, and activities and provide services.

If you do not provide relevant evidence it will not be possible to verify your identity using the Document Verification System. As a result, we may not be satisfied with your identity and you may not be able to receive services from us.

## How do we use your information?

In addition to the use described in the section of this policy titled "Why do we collect information and who do we collect such information from", we may use and exchange your information so that we can seek access to credit information held by a credit reporting body on your behalf, provide you with credit (and associated services) and to manage our relationship with you, including to:

- identify you and verify your identity;
- verify that your information is correct;

- assess, complete and process your application for credit;
- establish, provide and administer your credit facility;
- comply with legislative or regulatory requirements;
- corresponding with you and contractors in relation to your credit facility;
- undertake internal processes, including product development, risk management and pricing;
- carry out your instructions, or assist with your inquiries;
- collect overdue payments;
- do anything we are required or authorised by law to do; and
- identify and (unless you tell us not to) tell you about our products and services, and those of third parties, that might interest you.

Generally, we will not use or exchange your information for any purpose other than one that is set out in this Privacy Policy, or for a purpose that is disclosed to you or for the purposes to which you have consented.

### Who do we exchange your information with?

We may disclose and exchange your information for any of the reasons mentioned above with third parties.

Third parties may include:

- other persons (for example, your referee or employers) to verify that information you provide is correct;
- any person with whom you make a joint application for credit;
- any person who referred you, or your application for credit, to us;
- our external service providers and contractors (such as any mail house, commercial agent or entities that help us to verify your identity or identify illegal activities and prevent fraud);
- our employees, related entities, assignees, agents and external advisers;
- law enforcement, regulatory, government and dispute resolution bodies;
- any person we consider necessary to execute your instructions;
- any financial institution to or from which a payment is made in relation to any account you have or operate;
- other organisations who provide products or services to you jointly with us, or who we believe can offer products or services that will be of use to you;
- other credit providers and financial institutions;
- CRBs;
- debt collection agencies;
- anyone who obtains an interest in a credit facility we provide to you or is considering doing so, and their advisers;
- organisations involved in a transfer or sale of our assets or business;
- our funders and any organisation providing credit support or repayment support relating to your



credit facility;

- our insurers; and
- third parties authorised by you to receive information held by us.

### **Do we disclose personal information overseas?**

In some circumstances, we may disclose your personal information to recipients located outside Australia for the purposes of processing certain international transactions. Our service providers may be located in the United States and/or India.

The countries we disclose your information to will depend on the details of the transaction you ask us to carry out.

We will take reasonable steps to ensure that the entity to whom we disclose the information stores the information in a secure manner and otherwise complies with the Privacy Act in respect of that information.

### **Which CRBs do we exchange credit information with?**

If you ask OurMoneyMarket Services (in its capacity as a credit representative entity), to obtain on your behalf, your credit history for the purposes of obtaining a quote for credit, or if you are applying for credit from us, you agree that OurMoneyMarket Services as the credit representative entity or OurMoneyMarket Lending as the credit provider, may give a CRB your personal information and credit-related information which may include but is not limited to:

- your full name, including any known aliases, your sex and your date of birth;
- your most recent three addresses;
- the name of your current or last known employer;
- your driver's licence number;
- details of any payment default amount of over \$150;
- the fact that you have applied for credit and the amount;
- the fact that we are a current credit provider to you;
- details of payments that are more than 60 days overdue where debt collection action has commenced;
- advice that payments are no longer overdue;
- the fact that the credit we provide has been paid or discharged;
- that in certain circumstances, you have committed fraud or other serious credit infringement; and
- repayment history information for a 2-year period.

We may obtain a credit report about you from a CRB. A credit report will provide us with information about you that is held by the CRB and which has any bearing on your consumer and commercial creditworthiness. You acknowledge that OurMoneyMarket Services as a credit representative entity, may (if you authorise us to) obtain this information on your behalf, for the purposes of helping you obtain a quote for credit from a credit provider (including OurMoneyMarket Lending). We may then collect this information from the credit



representative entity in our capacity as a credit provider.

We may use the information obtained from this credit report to confirm your identity, assess an application for credit (including arriving at our own assessment of your creditworthiness), manage our relationship with you and collect overdue payments.

The CRBs we may use are:

- Equifax (Equifax Australia Information Services and Solutions Limited), whose privacy policy (which explains how it manages credit information) and contact details are at [www.equifax.com.au](http://www.equifax.com.au);
- Illion (Illion Australia Pty Limited and its related parties, Dun & Bradstreet (Australia) Pty Limited and DBCC Pty Limited) whose privacy policy (which explains how it manages credit information) and contact details are at [www.illion.com.au](http://www.illion.com.au); and
- Experian Australia Credit Services Pty Ltd, whose privacy policy and contact details are set out at [www.experian.com.au](http://www.experian.com.au)

You can ask a CRB not to use or disclose credit information it holds about you for a period of 21 days (called a "ban period") without your consent if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud. When you apply for credit, you are taken to agree to us accessing your personal information (including credit-related information) held with a CRB, even if there is a ban period in place, for the purposes of assessing an application for credit or in order to collect overdue payments.

CRBs may use credit information they hold to respond to requests from us or other credit providers to "pre-screen" you for direct marketing. You can ask a CRB not to do this. However, if you are a borrower you may still receive direct marketing from us (unless you ask us not to by contacting us at 1300 990 115 or email [info@ourmoneymarket.com](mailto:info@ourmoneymarket.com)) that has not been "pre-screened".

As a credit applicant, you agree to us accessing your personal information (including consumer credit and commercial credit information, if applicable) held with a CRB, even if there is a ban period in place, for the purposes of assessing an application for credit or in order to collect overdue payments.

### How do we store information collected?

We keep a hard copy and electronic records on our premises and systems or offsite using trusted third parties. We ensure the personal information we hold on you is secure at all times, including ensuring that it is protected from misuse, interference and loss, unauthorised access, disclosure and modification.

Your information is only accessible by you and those authorised to access it. Employees and third parties who deal with your information are bound by confidentiality obligations and are required to complete training about information security and privacy.

When we no longer need your information, including when we are no longer legally obliged to keep records relating to you, we will destroy it or de-identify it.

## Security

We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

## How can you access, amend and correct your information?

We take all reasonable steps to ensure that the information we may collect, use or disclose is accurate, complete and up-to-date. You have the right to access your information and correct it if it is inaccurate, out-of-date or incomplete.

You may request access to the information we hold about you at any time by contacting us. We will respond to your request within a reasonable time. There is no fee for making a request but we may charge you the reasonable costs of providing our response to a request for access to personal information.

If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act on which we rely to refuse access.

You may also ask us to correct any information we hold about you by contacting us, alternatively you can make any changes to your personal details via your personal OurMoneyMarket account. We encourage you to advise us as soon as there is a change to your contact details, such as your phone number or address. We will deal with your request to correct your information in a reasonable time. If we correct your information and it is the information we have provided to others, we will notify them of the correction where we are required to do so by the Privacy Act. If your request to correct your information relates to information that has been provided to us by a CRB or another credit provider we may need to consult with them about your request. We will correct information, where we decide to do so, within 30 days of your request, or longer if you agree.

If we do not agree with the corrections you have requested, we are not obliged to amend your information accordingly, however, we will give you a written notice which sets out the reasons for our refusal.

There are various ways you can contact us to alert us to changes to vital personal information (such as a residential address, home phone, etc). Our contact details are shown below. Your pro-active approach ensures the information we hold on you remains accurate and up-to-date. You can also request access to this information which we must grant except in limited circumstances.

## Direct marketing and your information

We may use your personal and credit information to advertise or promote products, services, or business or investment opportunities we think may interest you, including by email or telephone. We may also provide your information to other organisations for specific marketing purposes. However, we will not do so where you tell us not to.





You can ask us not to contact you about products and services and not to disclose your information to others for that purpose by calling us on 1300 990 115.

### Questions and complaints

If you have any questions or concerns about this Privacy Policy, you may contact us by emailing us at [info@ourmoneymarket.com](mailto:info@ourmoneymarket.com) or calling us on 1300 990 115.

Additionally, if you believe that in handling your personal information we have breached the Australian Privacy Principles, Part IIIA of the Privacy Act or the Credit Reporting Privacy Code and you would like to make a complaint, you may use these same contact details noted above to lodge a complaint.

Once we receive your complaint, we will respond to you as soon as possible and will let you know if we need any further information from you. We will notify you of our decision within 30 days, however, if we are unable to do so, we will let you know the reason for the delay and the expected timeframe to resolve the complaint.

If you are not satisfied with our response to your complaint, or the way in which we have handled your complaint, you may contact the Australian Financial Complaints Authority, our external dispute resolution scheme, or the Office of the Australian Information Commissioner. The contact details of these entities are as follows:

#### **Australian Financial Complaints Authority**

GPO Box 3  
MELBOURNE VIC 3001  
1800 931 678  
[www.afca.org.au](http://www.afca.org.au)

#### **Office of the Australian Information Commissioner**

GPO Box 5218  
SYDNEY NSW 2001  
1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

Either of these entities may forward your complaint to another external dispute resolution body if they consider that the complaint would be better handled by that other body.