



Privacy Policy

Safe Group of Companies

Safe Group of Companies – Privacy Policy

The policy covers Safe Finance Pty Ltd (ACN 098 751 930), holder of Australian Credit Licence Number 391958, and its related companies (the "*Safe Group of Companies*"). Some of the companies within the *Safe Group of Companies* are credit providers, while others are credit assistants, finance brokers, debt management service providers or general providers of finance-related products or services. We provide a list of the current members of the *Safe Group of Companies* later in this Privacy Policy (the "*Policy*").

This *policy* outlines how members of the *Safe Group of Companies* deal with your *personal information* (including *credit-related information*) as well as their legal obligations and rights in relation to that information.

This *policy* includes our *credit reporting policy*, meaning it covers additional information on how we manage your *personal information* collected in connection with an application for credit. We refer to this type of *personal information* below as *credit-related information*.

If we agree with you to use or disclose your *personal information* in different ways than those stated in this *policy*, then in those circumstances this *policy* is modified accordingly.

If you are a body corporate, while we generally will deal with information in a similar manner to the way we deal with *personal information* (including *credit-related information*) of an individual, we are not obliged to and will not be bound to deal with your information in this way under applicable legislation and will not accept any liability if we fail to deal with information in this way.

1. Our commitment to protect your privacy

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

Any personal information we collect about you will only be used for the purposes we have collected it for or as allowed under applicable law, including the Privacy Act 1988 (Cth) (the "Privacy Act").

Where applicable, we abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and comply with the Credit Reporting Code made under that Act (the "Credit Reporting Code").

2. Why we collect your Personal Information

We collect *personal information* from you for the purposes of dealing with you and to assist us in arranging for the products and services you request to be provided to you. We may also collect your *personal information* for the purposes of direct marketing and managing our relationship with you. This may also entail collecting *credit-related information* when you decide to apply for credit.

3. What Information may we collect?

The type of information that we collect from you will depend on which products and services you choose to enquire about.

We may collect *personal information* (which includes *credit-related information*), *credit eligibility information* and with your consent, *sensitive information*. The meaning of these expressions is explained below.

Where you apply for credit or services from another credit provider, that credit provider will have its own privacy policy relating to the protection of your privacy and you will be bound by that other policy.

Personal Information means information from which your identity is reasonably apparent and includes *credit-related information* and *credit eligibility information*. Examples are:

- identifying information, like your name, address, date of birth and other contact details;
- information about your financial position, like your income, expenses, savings, assets and any (other) credit arrangements;
- your employment details;
- your tax file number;
- your reasons and objectives for applying for a product or service and, where required, other details such as the ages and number of your dependants and cohabitants, the length of time you have lived at your current address, and

- any other information we consider relevant to the assessment of your application and in the case of an application for credit for submission to a lender.

Credit Information includes:

- details of credit applied for and details of the type and amount of credit granted;
- the fact that credit provided to you has been repaid;
- whether or not you have made payments on time;
- default information, being payments overdue for at least 60 days and for which collection action has started;
- information about your creditworthiness;
- details of any new arrangements made with you,
- court proceedings and person insolvency information, and
- if applicable, our opinion is that you have committed a serious credit infringement.

Credit Eligibility Information refers to *credit-related information* received by us from a *credit reporting body* and includes *credit reporting information*.

Credit-Related Information means *credit-related information* and *credit eligibility information*.

Credit Reporting Body refers to an agency that holds *credit-related information* relating to individuals and businesses.

Credit Reporting Information means *credit-related information* provided by a *credit reporting body*.

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 records, or health records.

4. How do we collect your Personal Information?

Where possible, we will collect your personal information from you, but we may also collect personal information about you from credit reporting bodies and other people such as your creditors, financial institutions, other persons whom you have or have had dealings with, including referees, employers, landlords, accountants, lawyers, financial advisers, and financial counsellors. We may also collect personal information about you from lead providers and other organisations where you have provided your consent to them passing on your personal information to us. All telephone calls to and from us are recorded and we take your consent to us recording a telephone call as your consent to us recording all future calls unless you advise us to the contrary.

5. How do we use your Personal Information?

We may use your *personal information* (including *credit-related information*) for the purposes of considering any application made by you for products or services offered by us, including credit, providing you with products and services, acting as a referrer of your business to others, managing our relationship with you and running our business. We may also use your *personal information* for other purposes where required or permitted by law.

6. Use of your Personal Information for Direct Marketing Purposes

We may also use *personal information* for direct marketing to tell you about other products and services offered by us or by our business partners. We may also provide your details to other organisations for specific marketing purposes.

We will consider that you consent to this use, unless you indicate to us that you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You may contact us using any of the methods set out below.

If the direct marketing is via email you may also use the unsubscribe function in the email you receive. If the direct marketing is via SMS, you may reply “stop” and we will remove you from this list.

7. Personal Information About Third Parties

When you apply for credit from us or for the provision of credit assistance by us, we will ask you to provide us with *personal information* about other persons, such as referees and family members whom we may contact. These persons are referred to as "*third parties*". When you provide this information to us you warrant that you are authorised to do so.

When you provide us with *personal information* about *third parties*, you agree to inform each such person about who we are, how to contact us, how to obtain our privacy policy, and that we will use and disclose their *personal information* for the purposes set out in this *policy*, including to contact them to assist us in helping you honour your contractual obligations to us.

8. Contacting Third Parties and use of social media

We may, at any time while we are a credit provider to you or provide you with credit assistance, contact *third parties* to assist us in helping you honour your contractual obligations under any credit contract you have with us.

You also authorise us to use social media to contact you.

In circumstances where you have failed to honour your obligations to us and we are unable, for whatever reason, to contact you by other means, after making reasonable efforts to do so, you authorise us to make contact with:

- persons listed by you as your contacts, connections and friends on social media sites where you are a user, including third parties, and;
- your landlord, employer, accountant, referees, spouse/partner and any other person listed or referred to in any application for credit.

This is so we can establish contact with you for the purpose of assisting you to make sure you honour your contractual obligations to us.

9. Disclosing, Obtaining and Exchanging Personal Information

In addition to our rights to contact third parties as set out in paragraph 8, you agree that we may disclose, obtain and exchange *personal information* about you with:

- prospective lenders;
- corporations which are related to us;
- credit reporting bodies (explained below);
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants;
- persons who provide your bank statements to us where you have authorised that provision;
- mortgage insurers, where lenders mortgage insurance is organised in respect to your credit;
- insurers and re-insurers, where insurance is provided in connection with our services to you;
- debt collecting agencies, if you have not repaid a loan as required;
- any industry body, tribunal, or court or otherwise in connection with any complaint regarding the services we provide to you;
- our professional advisors, such as accountants, lawyers and auditors;
- other credit providers and their professional advisors;
- other brokers, credit assistants and intermediaries;
- your employer;
- the vendor of any goods you intend to purchase using any credit applied for;
- your representative, where authorised by you, or
- government and regulatory authorities, if required or authorised by law.

With your consent we may also disclose your personal information to our referral partners (in which case we will forward details of your application and supporting information and documentation to them). Our referral partners may offer services such as loans, debt management, credit repair, budgeting and rental services. You acknowledge that our referral partners may offer you a product that is not the exact same type of product or amount that you originally applied for from us.

10. Current members of the Safe Group of Companies

As indicated above, we may disclose your *personal information* to organisations which are part of the *Safe Group of Companies* to assist us and them in providing the products or services you request. The current members of the *Safe Group of Companies* include Safe Finance Pty Ltd (ACN 098 751 930), Safe Business Finance Pty Ltd (ACN 131 891 015), Safe Debt Management Pty Ltd (ACN 010 183 294), Safe Financial Group Pty Ltd (ACN 138 086 852) and Eastcoast Capital Pty Ltd, (ACN 100 148 623).

11. Security of your Personal Information and Disclosures Overseas

We take reasonable steps to ensure that your *personal information* held by us is protected from misuse, interference, loss, unauthorised access, disclosure or modification.

We may disclose your *personal information* overseas to persons engaged by us to provide us with services. We will always seek protective measures to ensure our service providers take appropriate steps to protect that information in compliance with the Australian Privacy Principles.

12. Credit Reporting Bodies

A *credit reporting body* collects *credit-related information* about individuals, which is then provided as a report to credit providers and others in the credit industry to assist credit providers in managing credit risk, providing credit, collecting debts and other activities.

If you apply for credit or for credit assistance or apply to be a guarantor, we generally will apply for a credit report from a *credit reporting body* and they will disclose to us, our related corporations and authorised agents, *personal information* about your credit worthiness. *Personal information* obtained by us from a *credit reporting body* will be used by us to assess any application for credit and other permitted purposes.

We may also disclose *personal information* about you to a *credit reporting body*, including that you have applied for credit or credit assistance, repayment history information, credit liability information and that you are in default under a credit arrangement or have committed a serious credit infringement if that is the case. A *credit reporting body* may then include that information in reports it produces to other credit providers and may also use that information to create assessments as to your creditworthiness and create a credit score with regard to you.

The *credit reporting bodies* we currently deal with are:

- Equifax, whose privacy policy is at www.equifax.com.au;
- Equifax New Zealand, whose privacy policy is at www.equifax.co.nz;
- Illion Australia Pty Ltd, whose privacy policy is at www.illion.com.au and
- Experian, whose privacy policy is at www.experian.com.au.

You can view each *credit reporting body*'s privacy policy on its website to learn how it manages *credit-related information*.

We may seek and use commercial *credit-related information* about you to assess an application for consumer credit or commercial credit (as defined in the *Privacy Act*).

13. Credit pre-screening

Credit reporting bodies offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called "credit pre-screening". You have the right to request that a *credit reporting body* does not use your information for this purpose. To opt out of credit pre-screening, contact the *credit reporting body*, using the contact details on their websites noted above.

14. Notifiable matters

In circumstances where you have made an application for consumer credit, we are required, under the *credit reporting code* (which forms part of the *Privacy Act*), to ensure that you are aware of certain specific matters. Details of these matters can be viewed on our website at www.safefinancial.com.au and are also set out in the privacy consent notice we will ask you to agree to at the time you apply for consumer credit.

15. Updating your Personal Information

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. It is important to us that the personal information we hold about you is accurate and up to date. If you wish to make any changes to your personal information, please contact us.

16. Access and correction to your Personal Information and Credit Information

We will provide you with access to the personal information we hold about you on request. We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request you make we may respond to your request immediately. Otherwise, we will endeavour to respond to you within seven days of 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.

If you are an individual, an explanation will be provided to you if we deny you access to the personal information we hold about you.

You can gain access to the personal information held about you by contacting our Privacy Officer whose contact details are set out at the end of this Policy.

You can also request our Privacy Officer to arrange to correct any personal information we hold about you that you believe is incorrect.

17. What happens when we no longer need your personal information?

We take steps to ensure that we keep your *personal information* for as long as we require it for one or more of the purposes described in this policy. We're required by law to retain some information for certain periods of time, such as under the Corporations Act and the Anti-Money Laundering & Counter-Terrorism Financing Act. When we no longer require your *personal information*, we take reasonable steps to ensure that your *personal information* is dealt with in accordance with our internal "Data Retention Policy" which includes provision for your *personal information* to be destroyed, de-identified or rendered inaccessible where required or appropriate.

18. Notifiable Data Breaches

Under the Notifiable Data Breaches Scheme ("*NDB Scheme*") we are required to notify you and the Office of the Australian Information Commissioner ("*OAIC*") of certain data breaches and recommend steps you can take to limit the impacts of a breach (for example, a password change).

The *NDB Scheme* requires us to notify affected individuals about a data breach that is likely to result in serious harm. However, there are exceptions such as, where we have already taken appropriate remedial action that removes the risk of serious harm.

If we believe there has been a data breach that impacts your *personal information* and creates a likely risk of serious harm, we will notify you and the *OAIC* as soon as practicable and keep in close contact with you about the nature of the breach, the steps we are taking and what you can do to reduce the impacts to your privacy.

If you believe that any *personal information* we hold about you has been impacted by a data breach, you can contact us using the contact details set out at the end of this Policy.

19. Privacy and our Website

When you deal with us via our website, we collect additional *personal information* about you.

(a) Public Pages

Anytime you access an unsecured part of our website, that is, a public page which does not require you to log on, we will collect information about your visit, such as:

- the time and date of the visit;
- any information or documentation that you download;
- your browser type; and
- internet protocol details of the device used to access the site.

(b) Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (i.e. pages that you have to provide login details to access), we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (i.e. public pages you can access without providing login details), we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies; however, doing so might prevent you from accessing our website's secured pages.

(c) Email

When we receive emails, we will retain the content and our response to you where we consider it necessary. We may add your email address to our mailing lists.

(d) Third Party Websites

Our website may contain links to *third party* websites. The terms of this *policy* do not apply to external websites. If you wish to find out how *third parties* handle your *personal information*, you must obtain a copy of their privacy policy.

20. Changes to our Privacy Policy

We may change this *policy* from time to time (without notice to you) to suit our business requirements or comply with applicable laws. You may obtain a copy of our current *policy* at www.safefinancial.com.au or request one by contacting us.

21. Complaints and Questions

If you have any questions, concerns or complaints about this *policy*, our handling of your *personal information*, or you believe there has been a breach by us of the *Privacy Act* or the credit reporting provisions of the *Privacy (Credit Reporting) Code*, please contact our Privacy Officer specified below. You can also contact our Privacy Officer if you believe that the privacy of your *personal information* has been compromised or is not adequately protected.

Once a question or complaint has been lodged, our Privacy Officer will respond to you as soon as possible. We will aim to deal with any complaints at the source of your complaint.

If you are not satisfied with the response you receive, please let us know so we can investigate further and respond to you.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints. These include the Australian Financial Complaints Authority, which is our external dispute resolution scheme, and the Federal Privacy Commissioner. Either of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

Australian Financial Complaints Authority

Website: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678

Post: GPO Box 3 Melbourne VIC 3001

Federal Privacy Commissioner

Website: www.oaic.gov.au

Phone: 1300 363 992

Post: GPO Box 5218 Sydney NSW 2001

Our Privacy Officer's contact details are

Email: admin@safefinancial.com.au (marked for the attention of the Privacy Officer)

Post: PO Box 6840, GCMC QLD 9726

Members login: <https://members.safefinancial.com.au/>

This Privacy Policy is current as of 18 March 2025.