

ProLoan (Aust) Pty Ltd Privacy Policy



1. Introduction

ProLoan (Aust) Pty Ltd (ABN 98 005 189 097) (referred to as 'ProLoan', 'we', 'our', 'us') is bound by the Privacy Act 1988 ('Privacy Act'), including the Australian Privacy Principles ('APPs'). ProLoan recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by ProLoan must abide by this Policy.

Copies of this Policy are available free of charge for download from our website (www.proloan.com.au) or by contacting our Privacy Officer.

In this Policy:

- 'Disclosing' information means providing information to persons outside ProLoan;
- 'Personal information' means information or an opinion relating to an individual, which can be used to identify that individual;
- 'Privacy Officer' means the contact person within ProLoan for questions or complaints regarding ProLoan's handling of personal information;
- 'ProLoan Network Member' means a financial planning or accounting practice that has entered into a sub-referral agreement with ProLoan;
- 'Sensitive information' is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information; and
- 'Use of information' means use of information within ProLoan.

2. What kinds of personal information do we collect and hold?

If you are a ProLoan Network Member, or a staff member of a ProLoan Network Member, we may collect and hold personal information about you including your full name, employer or business name and contact details.

If you are a client of a ProLoan Network Member, we may collect and hold personal information about you including your:

- Full name;
- Contact details;
- Employment or professional details; and
- Financial information including loan and other bank account details; balances, transaction history, income, assets and liabilities.

3. How do we collect personal information?

If you are a member of staff or a principal of a ProLoan Network Member we generally collect your personal information from you directly when you complete the sub-referral agreement. We may also collect personal information about you from a third party, such as an identity verification service.

If you are a client of a ProLoan Network Member, we generally collect personal information about you from a third party which usually will be Westpac Banking Corporation, your accountant, financial adviser or an identity verification service.

Your personal information will be collected through our interactions with you, or these third parties, in the course of providing you (or your accountant or financial planner) with our services, including when you visit our website, call us or send us correspondence. When we collect personal information about you from a third party, we will take reasonable steps to ensure that you are made aware of this Policy.

We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

ProLoan will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If you do not provide us with the personal information we request, we may not be able to provide you with our products or services, or meet your needs appropriately. ProLoan does not give you the option of dealing with it anonymously, or using a pseudonym. This is because it is illegal or impractical for ProLoan to deal with individuals who are not identified.

4. Unsolicited personal information

ProLoan may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to ProLoan's purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.



5. Who do we collect personal information about?

The personal information we may collect and hold includes (but is not limited to) personal information about the following individuals:

- Clients or potential clients of any ProLoan Network Member;
- Individuals who are staff members or principals of ProLoan Network Members;
- Visitors to our website; and
- Service providers or suppliers.

6. Why does ProLoan collect personal information?

We collect and hold personal information about you so that we may:

- Provide ProLoan Network Members with our products and services, including to administer ProLoan Network Memberships and assist ProLoan Network Members to help their clients to structure or restructure their finances, insurances or investments;
- Review and meet the ongoing needs of ProLoan Network Members and their clients;
- Calculate and pay commissions and other remuneration due to ProLoan Network Members;
- Provide you with information we believe may be relevant or of interest to you;
- Let you know about other products or services we offer, send you information about special offers or invite you to events;
- Consider any concerns or complaints you may have;
- Comply with relevant laws, regulations and other legal obligations; and
- Help us improve the products and services offered to our clients and enhance our overall business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise or an exemption in the Privacy Act applies.

7. Who do we disclose personal information to?

We may disclose personal information to:

- A related entity of ProLoan;
- Members of the ProLoan Network;
- An agent, professional advisor or service provider we engage to carry out our functions and activities including our lawyers, accountants, IT contractors, and marketing companies;
- Organisations involved in a transfer or sale of our assets or business;
- Financial institutions involved in managing our payments, such as banks;
- Regulatory bodies, government agencies, law enforcement bodies and courts; and
- Anyone whom you authorise us to disclose it to.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues and will make third parties aware of this Policy.

8. Sending information overseas

We currently do not disclose personal information to overseas recipients.

We will not disclose your personal information to overseas recipients without your consent unless:

- We have taken reasonable steps to ensure that the recipient does not breach the Privacy Act, or the APPs; or
- The recipient is subject to a similar information privacy regime.

9. Management of personal information

ProLoan recognises the importance of securing the personal information of our clients.

We will take steps to ensure your personal information is protected from misuse, interference or loss, unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- Passwords are required to access the system and passwords are routinely checked;
- Data ownership is clearly defined;
- We change employees access capabilities when they are assigned to a new position;
- Unauthorised employees are barred from updating and editing personal information;
- All computers which contain personal information are secured electronically; and
- Print reporting of data containing personal information is limited.

10. Direct marketing

ProLoan may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- The personal information does not include sensitive information and;
- You would reasonably expect us to use or disclose the information for the purpose of direct marketing and;
- We provide a simple way of opting out of direct marketing and;
- You have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

11. How we use cookies

A cookie is a small file sent to your browser from a web server to be stored on your computer. A cookie cannot give access to your computer or any information stored on your computer. We use cookies to allow the ProLoan website to respond to you as an individual by gathering and remembering information about your preferences when using the ProLoan website so when you next visit the website your preferences for using the website are already set. Cookies are also used to personalise the content you view on the website. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. To view more information regarding cookie settings please visit:

- For Microsoft Internet Explorer: www.microsoft.com/info/cookies.msp
- For Google Chrome: www.google.com/support/chrome/bin/answer.py?answer=95647
- For Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Enabling%20and%20disabling%20cookies>
- For Apple Safari 5: <http://docs.infoapple.com/article.htmPpath=Safari%205.0/en%2019277.html>

12. Online advertising we use

We may use Google AdWords Remarketing to advertise ProLoan across the Internet. AdWords remarketing will display relevant ads tailored to you based on what parts of the ProLoan website you have viewed by placing a cookie on your machine. This cookie does not in any way identify you or give access to your computer. The cookie is used to say "this person visited this page, so show them ads relating to that page". Google AdWords Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

13. How to opt out of remarketing and advertising

If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting Google's Ads Preferences Manager at www.google.com/settings/ads/ads/preferences. You can also opt out of any third-party vendor's use of cookies by visiting www.networkadvertising.org/choices/



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14. Identifiers

We do not adopt identifiers assigned by the Government (such as driver's licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

15. How do we keep personal information accurate and up-to-date?

We are committed to ensuring that the personal information we collect, hold, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us if any personal information we hold about you needs to be updated. If we correct information that has previously been disclosed to another entity, we will notify the other entity of the correction within a reasonable period. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We will not charge you for correcting your personal information.

16. Accessing your personal information

Subject to exceptions in the Privacy Act, you can access the personal information that we hold about you by contacting the Privacy Officer. We will generally provide access within 30 days of your request. If we refuse to provide you with access to the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required.

17. Notifiable data breaches

Changes to the Privacy Act that take effect from 22 February 2018, require us to notify you if your personal information is involved in a data breach that is likely to result in serious harm to you. This is referred to as an "eligible data breach".

This notification must include recommendations about the steps you should take in response to the breach. We must also notify the Australian Information Commissioner of eligible data breaches. In the event of a suspected data breach, we will conduct an assessment to determine whether the breach is likely to result in serious harm and as a result, require notification.

18. Updates to this policy

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

19. Our responsibilities

It is the responsibility of management to inform employees and other relevant third parties about this Policy. Management must ensure that employees and other relevant third parties are advised of any changes to this Policy. All new employees are to be provided with timely and appropriate access to this Policy, and all employees are provided with training in relation to appropriate handling of personal information. Employees or other relevant third parties that do not comply with this Policy may be subject to disciplinary action.

20. Making a complaint

If you have any questions about this Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

- Telephoning – (03) 9863 3105
- Writing to – ProLoan Privacy Officer, Level 2, 431 St Kilda Road Melbourne VIC 3004
- Emailing – hello@proloan.com.au

If you are not satisfied with our response to your complaint, you can also send your complaint to the Office of the Australian Information Commissioner (OAIC) by:

- Telephoning - 1300 363 992
- Post - Director of Privacy Case Management
Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001
- Fax + 61 2 6123 5145