

Bond Free Privacy Policy

Bond Free Pty Ltd (ABN 94 619 224 565), and Group Companies* (**BondFree, we, us and our**) are bound and adhere to the *Privacy Act 1988* (Cth) and the *Australian Privacy Principles* under that Act ("**Privacy Act**") and the *Privacy (Credit Reporting) Code 2014*, as amended from time to time.

This Privacy Policy outlines how we collect, hold, use and disclose your personal information, whether provided to us by you directly or by a third party and whether via the internet or otherwise. This Privacy Policy also incorporates our "Bond Free Credit Reporting Policy". That is, this Privacy Policy also includes information on how we manage your personal information collected in connection with a credit application or a credit facility, referred to throughout as "credit information".

By providing us your personal information, making enquiries of us or using our services you consent to the collection, holding, use and disclosure of your personal information (including your name, address, email address, credit information and any other personal information including sensitive information, you give to us or we otherwise collect) in the ways set out in this Privacy Policy and as permitted by the Privacy Act.

How we collect your personal information and the types of personal information we collect

"Personal information" has the meaning given to that term in the Privacy Act and includes things like:

- ▶ your full name, address and contact details;
- ▶ your ID (eg a copy of your passport or driver's licence);
- ▶ information that can identify you such as your date of birth, telephone number, address and/or email address;
- ▶ financial information about you such as your income; and
- ▶ credit information.

We will not collect, use or disclose your sensitive information (such as information relating to nationality, race or ethnicity, criminal record, political and religious beliefs, sexuality and health information) unless such is necessary for us to perform our services or unless we are permitted or required by law to do so but, where you provide such to us, you consent to its collection, use and disclosure in accordance with this Privacy Policy.

We may collect your personal information from you in a number of ways, including:

- ▶ when you interact with us electronically via our Website, over the phone and/or in person;
- ▶ when you create an account on our Website; and/or
- ▶ when you respond to surveys or fill out a paper or electronic form, such as when you create an account with us

In some cases, we may ask you to give us personal information about other people (such as if you are entering into a tenancy arrangement with another person or other people). In such cases you must not provide us their personal information unless you have

obtained their consent, informed them that their personal information will be provided to us and handled in accordance with this Privacy Policy and provided them with (or directed them to) a copy of this Privacy Policy.

There are some cases where we might collect personal information about you from other people or organisations such as service providers, agents, advisers, employers and family members. We may also collect personal information about you from credit agencies and that is publicly available, such as from social media or public registers (e.g. the Australian Securities and Investments Commission and the Australian Business Register).

Regardless of how we collect your personal information, we will handle it in accordance with this Privacy Policy and the Privacy Act.

How do we use your personal information?

Generally, we will use your personal information to provide our services, undertake our day-to-day business, manage your account and improve the services we provide. We also use your personal information to conduct background checks of your financial situation (e.g. your ability to pay your debts), which allows us to provide our services to you.

Specifically, your personal information may be used by us to:

- ▶ verify your identity;
- ▶ manage our relationship with you, including contacting you;
- ▶ assess your application to use our products and services;
- ▶ assess your credit-worthiness and credit rating;
- ▶ provide our products and services to you;
- ▶ protect us and your account against fraud;
- ▶ prevent or detect money laundering and terrorist financing;
- ▶ assist you with customer support requests;
- ▶ handle complaints;
- ▶ internal operations we conduct, such as record keeping, auditing and training our staff;
- ▶ provide you with suggestions for products and services that might be suitable for you where you have opted-in to receive such;
- ▶ gather statistics and prepare internal reports for regulatory, management and research purposes;
- ▶ collect payments from you;

- ▶ engaging in legal proceedings and/or enforcing judgments and/or orders;
- ▶ comply with our legal and regulatory requirements; and
- ▶ for any purpose for which you have given your consent at the time of collecting your personal information

To whom do we disclose your personal information?

We may disclose your personal information to third parties where it is required for us to deliver our products or services or if requested by you to do so.

We may also disclose your personal information to any of our employees, officers, professional advisers, agents, suppliers or subcontractors in order to provide you with our products or services and for the purposes outlined in this Privacy Policy. This includes disclosures to:

- ▶ credit card companies who might be able to provide credit information about you;
- ▶ credit reporting bodies to assess your financial capability;
- ▶ people nominated by you as referees in support of your application; and
- ▶ any person where permitted or required by law (including legislation, regulations, court orders, subpoenas and warrants).

If there is a sale or transfer of our company, our business or business assets we may transfer our databases and any information (including your personal information) that is contained in these databases to the purchaser or transferee where the purchaser or transferee is either subject to (i) an agreement to maintain confidentiality and/or (ii) the Privacy Act.

Information that we collect will never be transferred or stored overseas/Where we disclose your personal information to a third party outside of Australia we require them to comply with this Privacy Policy and the Privacy Act with respect to their collection, holding, use and disclosure of your personal information]

How do we store your personal information?

We are committed to the security of your personal information. We take reasonable steps to prevent unauthorised access to or disclosure of your information including putting in place and maintaining various physical, electronic and governance procedures. As an example, we use industry standard (SSL) encryption on our Website as a means of securing the transmission of your information from your computer or device to our servers.

Credit Reporting

At various times, such as when we are checking your credit worthiness/assessing your credit situation, we will collect credit information about you from and give credit information to credit reporting bodies. We may collect this information directly from you or from other credit providers and/or credit reporting bodies.

Credit information includes:

- ▶ identification information;

- ▶ details about information requests made about you to credit reporting bodies (eg by a lender);
- ▶ current and historical details about credit applications/credit arrangements you have made/entered into;
- ▶ information/records about your consumer credit payments being overdue;
- ▶ consumer credit liability information;
- ▶ information about serious credit infringements;
- ▶ personal insolvency information; and
- ▶ publicly available information such as court judgements, credit scores/risk assessments about your credit worthiness.

When we disclose credit information about you to a credit reporting body, including in respect of serious credit infringement, the credit reporting body may include it in credit reporting information/reports that they provide to other credit providers/organisations (such as lenders) to assist them in assessing your credit worthiness. You have the right to request credit reporting bodies not to use or disclose the information they hold about you if:

- ▶ you believe you have been (or are likely to be) the victim of fraud; and/or
- ▶ you do not wish the information to be used for direct marketing/pre-screening purposes.

Contact details for the credit reporting bodies we use are detailed below under "Other Contact Details".

How can you gain access to and update/correct your personal information?

We take reasonable steps to ensure that any personal information we hold about you is accurate, complete and up-to-date. However, we require you to inform us of any changes to your personal information. If you are able to access your personal information via your online account that you have with us, we request that you ensure this information is kept accurate, complete, relevant and up-to-date.

You may request details of the personal information that we hold which relates to you. We may charge a small administrative fee to cover the cost of retrieving this information if you make such a request. However, we will advise you in advance if such a cost applies. Where you request access to credit information about you that we have obtained from credit reporting bodies, we will provide you access as soon as possible and request you check with the credit reporting bodies what information they hold about you for the purpose of accuracy.

To request a copy of the information we hold about you, please contact us using the details below. If we refuse to provide you access we will provide you with a written notice that outlines the reasons for the refusal.

If there has been an error made by us or someone else in respect of your credit information, we will assist you to correct the information within 30 days (unless exceptional circumstances arise). However, it would be more efficient for you to directly request correction from the organisation who made the error.

How can you make a complaint about privacy?

If you wish you make a complaint about the way we manage your privacy, please contact us using the details below. You will need to provide us sufficient details to identify yourself and regarding your complaint and include any supporting evidence. We will investigate the issue and determine the steps to be taken to resolve the complaint. We will notify you in writing if we require any additional information and also of the outcome of the investigation. If you are not happy with the outcome of our investigation, you may complain to the Office of the Australian Information Commissioner whose contact details can be obtained from the OAIC website noted below under "Further Information".

Third party sites

Our Website may contain links to the websites of other entities. If you click the links to other entities' websites you should read their privacy policies to find out how they handle your personal information when you visit their sites. We do not accept any responsibility or liability for the privacy of your information, including your personal information on or in respect of any other website and we have no control over (or responsibility for) the privacy practices of those entities.

Changes to this privacy policy

We may, from time to time, update this Privacy Policy so please ensure you review it periodically for changes. If any changes are significant or substantial we will either advise you in writing or post a message to that effect on our Website.

Your continued use of our services and/or our Website, requesting our services or the provision by you of further personal information to us (directly or through an authorised person) after this Privacy Policy has been revised will be deemed to be your acceptance of the revised Privacy Policy.

What other information is collected when you visit our Website?

In addition to your personal information, we may also collect other information that does not identify you when you visit our Website, including:

- ▶ your IP address when you visit our Website;
- ▶ statistical information that helps us understand how people use our Website, such as information about your web browser and operating system and the web page you visited before coming to our Website; and
- ▶ where you have enabled cookies, information about how you use our Website.

Contact us

To access your information or if you wish to make a complaint or if you have any query about this Privacy Policy, please contact us via the details below.

Email	Admin@bondfree.com.au
Phone	+61 1300 980 468
Post	GPO Box 1000 Sydney NSW 2001

Other Contact Details

Contact details for escalating complaints

Financial Ombudsman Service

Website: www.fos.org.au

Phone: 1800 367 287

Email: info@fos.org.au

Contact details for credit reporting bodies

As detailed above, we may collect information about you from/provide information to credit reporting bodies. Listed below are the contact details of the credit reporting bodies we may disclose your information to. Each credit reporting body has a credit reporting policy outlining how they handle your information. This can be found on their websites.

- Equifax Pty Ltd Formerly Known as Veda
Phone number: 13 83 32 Website <https://www.equifax.com.au>

Further Information

For further information about the Privacy Act or to make a complaint to the Privacy Commissioner, please see the website of the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

***(a) Bond Free Pty Ltd registered in Sydney ACAN 619 234 565**

(b) Bond Free Limited registered in New Zealand, Company Number 6269402

- (c) Bond Free LLC registered in Wyoming, United States, company number 572829;
- (d) Bond Free Victoria Pty Ltd registered in Victoria, ACN 604 820 439; and
- (e) Bond Free Limited registered in United Kingdom, Company Number 10728757