



## Privacy Policy

### Privacy Policy

Purple Circle Financial Services Pty Ltd  
ABN 21 611 305 170 Australian Credit License 486 112

#### Privacy Policy

This Policy applies to Purple Circle Financial Services Pty Ltd (Purple Circle) and all our Credit Representatives/Authorised Representatives (Representatives) and their staff. The privacy of your personal information is important to us. We are committed to respecting your right to privacy and protecting your personal information. We are bound by the National Privacy Principles in the Privacy Act 1988. Our staff and Representatives are trained to respect your privacy in accordance with our standards, policies and procedures.

#### About this Privacy Policy

This Privacy Policy outlines how we manage your personal information. It also describes generally the sorts of personal information held and for what purposes, and how that information is collected, held, used and disclosed. Our Privacy Policy applies to all your dealings with us, our website and our Representatives. We encourage you to check our website regularly for any updates to our Privacy Policy. We receive services to support the broking services we give you. We receive mortgage aggregation services from Specialist Financial Group. Sometimes they collect personal information about customers to manage customer enquiries or complaints, commission payments or file reviews. If you want to find out how they manage your personal information, please click on the link below:

<https://www.specialistfinancegroup.com.au/privacy-dispute-policies>

If you have any questions about this, please do not hesitate to contact us.

#### Collecting your personal information

##### *Credit Services*

As a credit service provider, we are subject to certain legislative and regulatory requirements under the National Consumer Credit Protection Act 2009 and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. These require us to obtain personal information about you including (but not limited to):

- your name, contact details, date of birth;
- length of time at your current address;
- information regarding your dependents and cohabitants;
- your occupation and employment history;
- your bank accounts;
- assets and existing finance; and
- proof of earnings, expenses and identity.

If you do not provide your information to us, it may not be possible to provide you with our services.

If you want to make purchases from (or through) us we will also collect your payment information. We will also collect this information if we need to make payments to you.

If you apply for employment with us we will collect information about your work history and ask your referees about you. If you apply to become a Purple Circle Representative we will collect information to enable us to assess whether you meet accepted industry standards.

### **How your personal information is collected**

We collect personal information directly from you whenever we can, like from enquiries we make of you when you seek our advice. We may verify that information from sources referred to in the responses to those enquiries or in this Privacy Policy.

Sometimes we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- we collect information from third parties about a loan or lease in relation to which you seek our services; or
- we exchange information with your legal or accounting or other representatives.

You have the right to refuse us authorisation to collect such information from a third party. If you give us information about another person (like your co-applicant) in relation to the services we provide, we require that you let that other person know that you have provided their personal information and direct them to our website for a copy of this Privacy Policy.

### **Credit Information**

You can appoint us as your agent and authorise us to obtain your credit information (including both consumer and commercial credit reporting and eligibility information) from a credit reporting body on your behalf. You can also authorise us to use that information to assist us to provide you with credit assistance.

### **Sensitive information**

We will only collect sensitive information about you with your consent. 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 record, or health.

We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising and dealing with you.

### **Unsolicited personal information**

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we'll determine whether or not it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we'll destroy or de-identify that personal information as soon as practicable.

### **Dealing with us anonymously**

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you make general inquiries about financial advisers near to your location, interest rates or current lender promotional offers.

### **Using your personal information**

#### *Credit Services*

We collect your personal information for the purpose of providing you with credit services such as:

- giving you information about loan/lease products or related services;
- considering whether you are eligible for a loan or lease or any related service you requested;
- recommending a suitable credit contract, an increase to your credit limit and/or that you retain your existing credit contract;
- assisting you to apply for a credit contract or an increase in your credit limit;
- recommending a suitable consumer lease or to retain your existing consumer lease;
- assisting you to apply for a consumer lease;
- to verify your identity.

We may use your personal information to tell you about other service providers, with whom we have arrangements, that supply goods or services that may be of interest to you.

We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. If you do not wish to receive information relating to other products and services please contact us at any time.

If you apply to become a Representative or apply for employment with us we will collect information about you to assist us to decide whether to appoint you.

We collect payment information in order to process your payments.

## **Disclosing your personal information**

### *Credit Services*

In order to provide you with credit services and to operate our business activities we will need to disclose your personal information to third parties. The organisations that we are likely to disclose information about you to include:

- our Representatives and their staff;
- the mortgage aggregator through whom we submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel;
- lenders and lessors;
- lender's mortgage insurers and other loan or lease intermediaries;
- anyone who represents you such as settlement agents, real estate agents, lawyers and accountants;
- valuers;
- your referees, like your employer, to confirm details about you;
- referrers that referred your business to us;
- guarantors and prospective guarantors of your loan or lease;
- to companies that provide information and infrastructure systems to us;
- agents, contractors, insurers, professional advisers and external service providers;
- Government and regulatory authorities and other organisations, as required or authorised by law such as under the Anti-Money or Laundering and Courter Terrorism Financing Act 2006 or in accordance with a subpoena or summons issued by a court;
- associated businesses that may want to market products to you;
- to anyone, where you have provided us consent.

In certain circumstances we may need to collect your tax file, Medicare or pension card number. We do not use or disclose this information other than for the purpose it was collected, authorised by law or if you have asked us to disclose this information to a third party. We will never use a government identifier to identify you.

We may also disclose your personal information to any other organisation that may have or is considering having an interest in our business. For example, a potential purchaser/organisation involved in the proposed sale of our (or our Representatives) business for the purpose of due diligence, corporate re-organisation and transfer of all or part of the assets of our business. Disclosure will be made in confidence and it will be a condition that no personal information will be used or disclosed by them.

We may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

Where your personal information is disclosed we will seek to ensure that the information is held, used or disclosed consistently with the National Privacy Principles.

## **Keeping your personal information accurate and up-to-date**

We aim to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. We will take reasonable steps to make sure this is the case. This way we can provide you with better service. If you believe your personal information is not accurate, complete or up to date, please contact us. If we refuse to correct your personal information we will provide you with our reasons within 30 days.

## **Protecting your personal information**

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse and loss and unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements for our employees, contractors and external service providers;
- Representative standards and rules for document storage and systems access;
- security measures to ensure the physical security of personal information held on our premises and systems; and
- deleting, de-identifying or destroying your personal information when records are no longer required.

We may use cloud storage to store personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

## **Your privacy on the Internet**

### *Our Website*

We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place including the use of firewalls. User identifiers, passwords or other access codes may also be used to control access to your personal information.

### *Links to Other Sites*

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

### *Cookies*

We may use cookies on our website. Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time.

## **Gaining access to your personal information**

You can gain access to your personal information. This is subject to some exceptions allowed by law. We may refuse to provide you with access, such as where the information relates to existing or anticipated legal proceedings, if the request is vexatious or if the information is commercially sensitive. If access is refused, we will give you a notice explaining our decision to the extent practicable and your options to make a complaint.

We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information.

We will provide you access within 30 days if it is reasonable and practicable to do so, but in some circumstances it may take longer (for example, if we need to contact other entities to properly investigate your request).

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

## **Notifying you of certain data breaches**

A data breach occurs when personal information held by us is lost or subjected to unauthorised access or disclosure. If we suspect or know of a data breach, we will take immediate steps to limit any further access or distribution of the affected personal information or the possible compromise of other information.

When we have reasonable grounds to believe that a data breach is likely to result in serious harm – for example identity theft, significant financial loss or threats to physical safety we will notify individuals at

likely risk as soon as practicable and make recommendations about the steps they should take in response to the data breach. We will also notify the Office of the Australian Information Commissioner. Notifications will be made using our usual method of communicating with you such as by a telephone call, email, SMS, physical mail, social media post, or in-person conversation. If we are unable to contact you, (or your nominated intermediary) by any of the above methods we will publish a statement on the front page of our website and place a public notice on our reception desk.

### **Resolving your privacy concerns**

If you have any issues you wish to raise with us or would like to discuss any issues about our Privacy Policy, please contact our Privacy Officer. Our Privacy Officer will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing within 30 days of the determination of our Privacy Officer. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner at:

Ph: 1300 363 992

e: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Mail: GPO Box 5218

SYDNEY NSW 2001

You can learn more about the Privacy Act and your rights at [www.privacy.gov.au](http://www.privacy.gov.au)

### **Contacting Us**

#### **Privacy Officer**

**14A Porter Street, Beaconsfield, WA 6162**

[1300 366 406](tel:1300366406)

[compliance@purplecfs.com.au](mailto:compliance@purplecfs.com.au)

[www.purplecfs.com.au](http://www.purplecfs.com.au)

### **Updates**

We may review and amend this Privacy Policy from time to time to address changes to laws and to reflect our current operations and practices. You may obtain a copy of the current version on request.