



CREDIT INFORMATION (PRIVACY) MANAGEMENT POLICY FOX FINANCE GROUP PTY LTD

Australian Credit Licence No.: 382952

This policy has been developed to appropriately acknowledge the importance of, and assist in providing a framework for, the appropriate level of protection for consumer identification and credit information protection. The policy represents Fox Finance Group Pty Ltd's (and its businesses Fox Car Loans, Fox Home Loans, Fox Business Loans and Fox Wealth Solutions) commitment to compliance with the privacy laws and privacy code obligations, as a credit assistance provider.

Concerning the collection, holding, use and disclosure of credit related personal information

We provide this policy in accordance with the Privacy Act, detailing the lawful approach we take in the collection of information in our role as credit assistance providers and in regard to the management and use of all information collected from our potential consumers and actual consumer, and all subsequent dealings with consumer representatives, credit reporting bodies, and other entities listed in this policy.

Introduction

In the course of our business, we provide assistance in regard to consumer credit, as defined in the Privacy Act. This credit being requested wholly or primarily for personal, family, or household purposes and, as a matter of business policy, no other use unless authorised.

Please note, this credit being requested wholly or primarily for personal, family and/or household purposes, or primarily for business purposes.

In the course of our business we seek to establish your credit worthiness. That means:

- (a) your eligibility to be provided with consumer credit;
- (b) your history in relation to consumer credit; and
- (c) your capacity to repay an amount of consumer credit, if we were to successfully proceed to facilitate a loan for you.



The kinds of credit information we collect and hold

In accordance with the industry's mandatory Credit Reporting Privacy Code, Obligation 5.1, we collect and hold credit reporting information, credit identification information, credit capacity information and personal information collected and held under Section 18 of the Privacy Act prior to 12 March 2014 and, thereafter, under PART 111A of the Privacy Act.

In accordance with Section 6 of the Privacy Act, we may collect and hold the following personal information:

1. identification information;
2. consumer credit liability information;
3. repayment history information;
4. a statement that an information request has been made to a credit reporting body, by a credit provider or credit assistance provider, in relation to your application for credit;
5. the type of consumer credit or commercial credit, and the amount of credit sought in an application that you have made to us or to a credit provider, in connection with which that credit provider has made an information request concerning you;
6. overdue and default information concerning your current and/or previous loans;
7. payment information about you, including information concerning late payments on previous loans;
8. information about new arrangements you may have made involving an existing credit contract;
9. court proceedings (civil) information about you;
10. personal insolvency information about you, as included on the National Personal Insolvency Index, which relates to bankruptcy, debt agreements, personal insolvency agreements and Sections 50 and/or 188 Bankruptcy Act directions and/or authorities;
11. publicly available information concerning your activities in Australia and your credit worthiness, including information recorded on the National Personal Insolvency Index;
12. any opinion that we might reach that you have committed a serious credit infringement in relation to consumer credit with which you have previously been provided, with the circumstances specified on the file; and
13. unsolicited information that we may deem relevant to keep on file.

Explanation of some of the key elements listed above is as follows.

Identification information about you

To assist in protecting you against identity theft and to assist in reducing the opportunity for fraud, we may ask you for some or all of the following identification information:



- your full name;
- any alias or previous name/s;
- date of birth;
- sex;
- current address;
- 2 previous addresses (if any);
- name of current employer; or
- name of last known employer; and
- driver's licence number.

Consumer credit liability information

We collect and hold consumer credit liability information, including:

- the name of any past or current credit provider;
- whether or not that/those credit provider/s holds an Australian Credit Licence;
- the type of consumer credit;
- the day on which the consumer credit was entered into;
- the terms or conditions of the consumer credit which relate to the repayment of that credit and anything that may be prescribed by regulation;
- the maximum amount available under the consumer credit; and
- the day on which the consumer credit was/is to be terminated, or otherwise ceases to be in force.

Repayment history information

During the course of our conduct of a preliminary assessment to determine your suitability for a loan, the following information about you as a consumer may be collected and held:

- whether or not you have met repayment obligations in the past;
- the date/s on which repayments may be due on any existing loan; and
- if, in the past, you were late with any repayments and whether or not you eventually made the repayment in a timely manner.

Overdue and Default information

We may collect and hold information about any repayment that was, or is overdue, under Section 88 of the National Credit Code, Regulation 86 of the National Consumer Credit Protection Regulations 2010 and Section 6Q of the Privacy Act.

How we collect credit information

We collect credit information from 6 possible sources:

1. from you;
2. from the documentation we request and you provide;
3. from credit reporting bodies;



4. from people or organisations you permit us to contact, to verify your credit relevant details;
5. from credit providers; and
6. from information about you publicly available, including court and tribunal reports and decisions.

Please note, depending on circumstances, we may choose not to seek information from all these sources to assess your application.

How we hold credit information securely

In all circumstances, we take reasonable steps to protect your information from misuse, loss, interference, unauthorised access, modification or unauthorised disclosure. Hard copies are held in a locked environment, with other security protection after business hours and electronic copies are held in a secure environment, with the application of appropriate passwords and other computer and software security techniques.

Overseas information transfers

We use several overseas based service providers to store information, which involves the transfer of consumer identification and/or credit information from us to that provider. These providers are located in the USA & Philippines

The credit reporting body

We provide information to and request information from Veda, a credit reporting body. If you have a need to contact that body, the contact details are:

Telephone: 1300 762 207

Website: www.mycreditfile.com.au

You may contact the body if:

- (a) you believe that the information they have on their file about you needs amendment or correction; and/or
- (b) you want the body to hold off disclosing any information from the their file about you because, on reasonable grounds, you believe that you have been, or are likely to be, a victim of fraud; and/or
- (c) you do not want the body to use their credit reporting information for the purposes of pre-screening for direct marketing by a credit provider.

Transfer of information between us and Veda, the credit reporting body

This information transfer is permitted under Division 2 of Part 111A of the Privacy Act 2012. The information involved is the credit-related personal information that a credit reporting body may provide about you, to assist us to assess your credit



worthiness. This information is relevant for use in establishing your eligibility for consumer credit.

Please note that the company may contract with Veda to have part or all of this information provided, from time to time, in accordance with company policy. This information has been provided to Veda by credit providers with whom you have had contact, and includes:

- (a) information about you after you turned 18, except identification information;
- (b) credit applied for and/or supplied in Australia;
- (c) your repayment history; and
- (d) any default information.

Use of credit eligibility information

In accordance with Section 21G, we use credit eligibility information for the following purposes:

- 1. credit related purposes involving you; or
- 2. permitted reporting of information to a credit reporting body; or
- 3. for a use prescribed by a court, or tribunal, or regulations.

We will disclose this information to:

- 1. credit providers (lenders) with whom we are in contact on your behalf;
- 2. credit reporting bodies;
- 3. a company related to us;
- 4. the external dispute resolution scheme we subscribe to; or
- 5. as authorised under Australian law, regulation, court or tribunal.

How you may access credit eligibility information that we hold about you

First contact the Privacy Compliance Manager, Sharon Wells, phone: 1300 665 906, email sharon@foxfinancegroup.com.au, post to Suite 13, The Corporate Centre, 13 Norval Ct, Maroochydore, Qld, 4558, or fax no. 1300 665 990.

In accordance with Section 21T and Code Obligation 19, at your request, we will:

- (a) give you access to any credit information we hold about you;
- (b) respond to your request within a reasonable period and provide the access within 30 days of your request;
- (c) provide the information in a clear manner and provide reasonable explanations and summaries of the information, to assist you to understand the impact of the information; and
- (d) deny access, only if such would be unlawful, required under Australian law, or by a court or tribunal, or would prejudice an official enforcement body investigation.



Following your successful request, access will be provided by the Privacy Compliance Manager, who will facilitate the provision of a print out of your information stored in the Fox Finance Group Specialist Storage System. This print out may be emailed, faxed or posted to you. Any denial of access will be in writing, with the reason/s explained and details of the company's internal disputes resolution process, relevant external resolution scheme and the Australian Privacy Commission, to which you may lodge a complaint if not satisfied with the company's explanation.

How you may seek the correction of credit information and credit eligibility information that we hold

Once you have inspected the personal credit information we hold on file about you, you may inform our Privacy Compliance Manager if you have discovered any information that is inaccurate, out-of-date, incomplete, irrelevant or misleading.

The Privacy Compliance Manager will be pleased to amend the file within 30 days but, in most cases, will require appropriate evidence from you to support your request. Please note that, in the exercise of this correction duty, the Privacy Compliance Manager is lawfully entitled to consult with a credit reporting body and/or relevant credit provider. You, and any entity consulted in the process, will be informed in writing of any correction.

How you may complain about our failure to comply with this Division, or the relevant registered CR code

There are 3 ways you may complain:

1. Verbally, or in writing, to our Privacy Manager.
2. If you are not satisfied with the Privacy Manager's response, you can complain verbally or in writing to our Internal Disputes Resolution Manager.
3. If you are not satisfied with the Internal Disputes Manager's response you can lodge a complaint either with the Australian Privacy Commission, contact details -GPO Box 5218

Sydney NSW 2001

Phone: 02 9284 9753

Enquiries: 1300 363 992ORWith the external disputes resolution scheme of which we are a member, contact details:

Credit and Investments Ombudsman Ltd

PO Box A252

Sydney South NSW 1235

Phone: 02 9273 8400

Fax: 02 9261 2798

Email: info@cio.org.au

There is no charge for lodging a complaint.



How we will deal with such a complaint

We will write to you acknowledging receipt of the complaint. After appropriate investigation, the Privacy Manager will write to you as soon as practicable after a decision has been reached, outlining the decision and the reasons for reaching it.