

# Privacy

## Our commitment

At First Preference Finance Solutions we recognise that your privacy is very important to you. We handle personal information provided by and about people every day. By personal information we mean information or an opinion about a person whose identity is apparent or can reasonably be ascertained.

We are bound by, and committed to supporting, the National Privacy Principles (NPPs) set out in the Privacy Amendment (Private Sector) Act 2000. Our aim is to both support, and ensure that we comply with, the NPPs that form the basis of laws introduced to strengthen privacy protection for the general public. The information set out below is largely a summary of our obligations under the NPPs.

We believe that this Policy will address any potential concerns you may have about how personal information you provide to us is collected, held, used, corrected, disclosed and transferred. You can obtain more information on request about the way that we manage the personal information we hold. If you seek any further information please contact us in one of the ways set out below.

## Collection

As a finance broking business we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with advice that may be dependent on us obtaining certain personal information about you, including (but not exclusively):

- employment details and employment history;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover, estate planning and superannuation;
- information about your employment history, employment circumstances, family commitments and social security eligibility.

Failure to provide the personal information may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Generally collection of your personal information will be effected in either face to face interviews, over the telephone, e-mail or by way of facsimile. From time to time additional and/or updated personal information may be collected through one or more of those methods.

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- recommendations of finance and loan products
- preparation of relevant and required finance applications
- reviewing your finance positions including outstanding borrowing amounts

## Use and Disclosure

We will not use or disclose Personal Information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We may be required under the Rules of MIAA (Mortgage Industry Association of Australia) to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you. However, you may contact us to request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

#### Sensitive Information

Some personal information is specifically defined in the Act to be sensitive information. This information cannot be collected unless your consent is given or it is required by law. Sensitive information includes information (or an opinion) about someone's health, religious, political or philosophical beliefs, sexual preferences, criminal record or membership of political, trade union, professional or trade associations.

First Preference Finance Solutions collects sensitive information where insurance cover is applicable, both at the initial application for membership stage and at the time when a claim is made and being processed.

#### Access and Correction

Your personal information is generally held in your client file. Information may also be held in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable cabinets which are locked out of hours. Access to our premises is controlled by only allowing personnel with security passes to gain entry. All computer based information is protected through the use of access passwords on each computer and screen saver passwords. Data is backed up each evening and stored securely off site.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure storage facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

You may at any time, by contacting us, request access to your personal information and we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information we hold about you is inaccurate, incomplete or outdated, you may contact us and provide evidence of the inaccuracy or incompleteness or out datedness. We will, if we agree that the information requires correcting, take all reasonable steps to correct the information. If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

#### Identifiers

We will not adopt as our own any identifiers that you may provide to us such as TFNs, Medicare numbers etc.

#### Anonymity

You will only be able to interact with us without identifying yourself when making general inquiries on the telephone. You will need to identify yourself appropriately if you require information about your personal investment details.

#### Sending Data Overseas

We will not send any personal information about you overseas unless you consent to this, or we reasonably believe that the other country has privacy laws substantially similar to our own, or we provide the information in other circumstances giving like protection.

#### Complaints Resolution

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us, and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner on 1300 363 992 or visit the Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au) who may investigate your complaint further.

#### Contact Us

If you seek any further information from First Preference Finance Solutions about the privacy policy please contact our Privacy Officer at:

PO Box 1066 Canning Bridge WA 6153 PH: 08 9315 0444