

PRIVACY POLICY

Your privacy is important

Common Cents Advisory, understands that the details you provide us with are not only private and personal but that how we collect, use, hold, exchange and protect your information is important to you. It's imperative that you feel secure whenever you deal with us. It's also important that you understand how we protect your privacy, as well as how, when and where we may use your personal information. This Privacy Policy is our commitment to you on what our policies towards your privacy are. You can be confident in the fact that we abide by and are bound by the Privacy Act and the Australian Privacy Principles (**APPs**) for the protection of personal information.

What information do we collect?

We collect personal information. Personal information means any information or opinion about you as an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. For example identity and contact details, marital status and financial information.

We may also collect sensitive information for specific purposes. For example, information about your health to enable the credit provider to assess an application you make for mortgage protection insurance and calculate any premiums. If we need this type of information, we will ask for your consent.

How do we collect your personal information?

We will always aim to collect your personal information directly from you. If for some good reason, we are unable to do so, we may involve another organisation. For example, we may need to request a credit report from a credit reporting body when you apply for a credit facility. Before doing so or prior to collecting the information we need, we will inform you of the type of organisations we intend to disclose your personal information to. We may also collect your personal information through third parties who undertake the collection on our behalf

Why do we collect your personal information?

We collect and receive personal information directly from you or from other business referrers in order to conduct our business so that we can:

- submit your application for credit to a supplier via our Aggregator partner National Mortgage Brokers Pty Ltd;
- identify and tell you via direct marketing communications about other products or services offered by us or a third party that may interest you (unless you tell us not to);
- administer our customer relationships;
- for internal purposes, including for reporting and analytical purposes;
- meet our legal and regulatory reporting obligations;
- establish a customer marketing program;
- system development testing purposes;
- ensure your security when visiting our website and to learn which areas of the site are of most interest to you (see the section 'cookies' below); and
- any other purpose related to the above.

Direct Marketing

As stated above, we may use the information we gather to provide you with targeted communications about products and services we think will be of interest to you. We may also send you details of offers or services provided by our business partners and related entities. These direct marketing offers and promotions are designed to make your life easier, not harder.

You may at any time choose not to receive these communications. Doing so will not cost you anything, and we commit to ensure you stop receiving any unwanted communications as soon as possible. If you do not want to receive such marketing communications, please write to us at the following address:

The Privacy Officer at:
Common Cents Advisory
74 Macgregor Street
Malvern East VIC 3145

or email the Privacy Officer at broker@commoncentsadvisory.com

Why do we exchange your information with another organisation?

As a Mortgage Broker, we aim to provide you with products and services which suit your requirements. That means we partner with other organisations who provide and support the products and services we offer. In order to submit your application to a supplier for consideration, we will need to provide such supplier with your personal information that we hold.

As you will appreciate, in certain circumstances we may be compelled by law to disclose your personal information to various authorities. For instance, we may be required under the *Anti-Money Laundering and Counter-Terrorism Financing Act* to disclose details of financial transactions and we may also be compelled under tax laws to provide such information to regulators.

Other organisations which we may exchange your personal information with may include:

- credit providers;
- credit reporting bodies;
- government and law enforcement agencies;
- our suppliers, associates, service providers or contractors (including, for example, call centre, stationery printing houses, mail houses, information technology, marketing agencies, and marketing research companies etc);
- any person who proposes to guarantee or has guaranteed repayment of any credit provided to you;
- mortgage insurers, brokers, originators and/or managers, financial consultants, accountants, lawyers or real estate agents;
- National Mortgage Brokers Pty. Ltd., our aggregator partner;
- those in connection with funding financial accommodation by means of an arrangement involving securitisation;
- third parties to enable them to contact you to offer their products and services or to determine if you would be interested in the products and services; and
- any person considering acquiring or taking an interest in our business.

This is to your benefit, and helps us to provide the products and services you would expect from Common Cents Advisory.

Before we disclose any of your personal information to any other organisation, we will take reasonable steps to ensure that:

- The organisation has the same commitment as us to the protection of your personal information; AND
- You have consented to us doing so.

By consent, we mean approval in writing, orally, or implied from your dealings with us.

Disclosure of personal information overseas

We may hold or process your information on servers located overseas for filtering, hosting or storage purposes, reporting and analytical purposes and for system development testing purposes. If we do this, we make sure that such organisations have the appropriate data handling and security arrangements in place to ensure compliance with this Privacy Policy. Australia's Privacy Act may not apply to such overseas organisations.

Access to and correction of your personal information

It is important for us, and for you, that the information we hold is accurate and up to date. In this, we rely on you to help us. We ask that you contact us whenever there are any changes to your personal information, so that we can update our records.

The personal information we hold about you is yours to access and correct, and as such we can provide you with general information, such as your name, address and contact details quite easily. There is no fee for making the initial request. More detailed information may not be as easy for us to access, and if necessary, in some cases there may be an access charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is an access charge, we'll give you an estimate up front and confirm that you'd like us to proceed. Generally, the access charge is based on an hourly rate plus any photocopying costs or other out-of-pocket expenses. You'll need to make the payment before we start.

The process of providing you with access to or correcting your personal information may take up to 30 working days from the date of your request. If we refuse to give you access to or correct your information, we must give you written notice setting out the reasons for the refusal and the mechanisms available for you to complain about the refusal.

If you need to access or correct your detailed information, just write to us at the following address:

The Privacy Officer at:
Common Cents Advisory
74 Macgregor Street
Malvern East VIC 3145

or email the Privacy Officer at broker@commoncentsadvisory.com

Security and storage of your personal information

How long do we keep information about you?

By law, we are required to hold certain information about you, even after you are no longer a customer. We may also hold certain information about you if it is needed for a purpose which you are aware of or reasonably expect us to hold the information. When your information is no longer needed or required to be held by law, it will be destroyed or de-identified.

How safe and secure is the information we hold about you?

We will take great care to protect your personal information by storing it in a secure environment, and when the information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorized access, modification or disclosure.

What are 'cookies' and how do they work?

Cookies are small data files that are downloaded from our web servers, and stored on your hard drive. A cookie is a string of letters and numbers that uniquely identify the computer you are using, and the customer number and access code you may have used to register at the site. Cookies are used on the Common Cents Advisory's web site. We track a visitor's journey through our site. This allows us to see at a glance which pages and information is of most interest to visitors. This type of cookie contains no personal information at all; simply a record of your journey through the site. Most browsers can be configured to refuse to accept cookies. You can also delete cookies from your hard drive. However, doing so may hinder your access to valuable areas of information within our site.

If you have a privacy complaint

Common Cents Advisory values our customers. We will always aim to be fair and responsive. If you have a complaint, including a complaint about Common Cents Advisory's compliance with the APPs, you have the right to expect that we will handle it in a friendly and professional way. When we receive a complaint, we look on it as valuable feedback that may help us to improve the services we offer and to ensure your needs are met in a satisfactory and appropriate manner. If you wish to complain, at any time, about the handling, use or disclosure of your personal information, or about Common Cents Advisory's compliance with the APPs, just write to us at the following address:

The Privacy Officer at:
Common Cents Advisory
74 Macgregor Street
Malvern East VIC 3145

or email the Privacy Officer at broker@commoncentsadvisory.com

We will make all efforts possible to investigate your complaint, and advise you of the outcome as soon as possible. If the matter is not resolved to your satisfaction, you can then refer your complaint to the Australian Information Commissioner, who can be contacted at:

Office of the Australian Information Commissioner (OAIC)
Level 3
175 Pitt Street
Sydney NSW 2000

More information

You can request further information about the way we manage the personal information that we hold by writing to:

The Privacy Officer at:
Common Cents Advisory
74 Macgregor Street
Malvern East VIC 3145

or email the Privacy Officer at broker@commoncentsadvisory.com