

CCC FINANCIAL SOLUTIONS PTY LTD

PRIVACY POLICY AND PROCEDURE

Contents

Purpose	3
Scope.....	3
Responsibilities	3
Senior Management Group (SMG)	3
Supervisor/Coordinator	3
Employees	3
Procedure.....	3
What personal information do we collect and hold?	3
General information.....	3
Credit Reporting Information.....	4
What sensitive information do we collect?	4
When the law authorises or requires us to collect information.....	4
How we collect your information from other sources.....	4
What if you don't want to provide us with your personal information?.....	5
What do we do when we get information we didn't ask for?	5
How do we take care of your personal information?	5
What happens when we no longer need your information?.....	5
Use and disclosure	5
Access and correction	6
Openness.....	6
Subcontractors.....	6
Trans border data flows.....	6
Contacting CCC Financial Solutions Group.....	6
Credit information complaints.....	6
What else can you do.....	6
Related Documents.....	7

Purpose

CCC Financial Solutions Group respects our customer's personal information, and this Privacy Policy explains how this information is handled.

CCC Financial Solutions Group comply with the requirements of the *Privacy Act 1988* (Cth) (the Act) and the *Australian Privacy Principles* (APPs), contained in the Act in all activities involving the collection, use, disclosure and handling of personal information.

This Policy also includes CCC Financial Solutions Group Credit Reporting Policy, which covers additional information on how personal information is collected and managed in connection with your credit facility.

Scope

The Policy covers all business activities of CCC Financial Solutions Pty Ltd - ACN 134 665 142 and all its related companies to the extent that they affect or involve the collection, use, disclosure or handling of personal information.

In this Policy, "we", "us" or "our" means each member of the CCC Financial Solutions Group.

In this Privacy Policy and Procedure, the definition for personal information is taken from the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth):

'personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. *whether the information or opinion is true or not; and*
- b. *whether the information or opinion is recorded in a material form or not.'*

Responsibilities

Senior Management Group (SMG)

- The SMG are responsible for managing the compliance of the Privacy Policy and Procedure.

Supervisor/Coordinator

- It is the responsibility of the Team Leader/Coordinator to ensure that employees within their respective teams comply with this procedure.

Employees

- All employees must comply with this Policy and Procedure and attend training specific to their role.

Procedure

Please note that calls to and from CCC Financial Solutions Group may be recorded.

What personal information do we collect and hold?

General information

Whether for CCC Financial Solutions Group or its clients, CCC Financial Solutions Group will collect personal information by lawful and fair means and not in an unreasonably intrusive way.

Where practicable, CCC Financial Solutions Group will make known the purpose for which it is collecting personal information.

The types of information that we collect and hold may include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth.
- Other contact details such as social media handles.
- Financial details such as your tax file number.
- Other information we think is necessary to carry out our work.

Over the course of our relationship with you, we may collect and hold additional personal information about you, including transactional information, account or policy information, complaints or enquiries about your account.

Credit Reporting Information

We may collect information about you and provide it to credit reporting bodies. This information can include:

- ID information: a record of your name(s) (including an alias or previous name), date of birth, gender, current or last known address and previous two addresses, name of current or last known employer and drivers licence number.
- Information request: a record from a credit reporting body.
- Default information: a record of your consumer credit payments being overdue.
- Serious credit infringement: a record of when a lender reasonably believes that there has been a fraud relating to your consumer credit or that you have avoided paying your consumer credit payments and the credit provider can't find you.
- Personal insolvency information: a record relating to your bankruptcy or your entry into a debt agreement or personal insolvency agreement.
- Court proceedings information: an Australian court judgment relating to your credit.
- Publicly available information: a record relating to your activities in Australia and your credit worthiness.
- Consumer credit liability information: certain details relating to your consumer credit, such as the name of the credit provider, whether the credit provider has an Australian Credit Licence, the type of consumer credit, the day on which the consumer credit was entered into and terminated, the maximum amount of credit available and certain repayment terms and conditions.
- Repayment history information: a record of whether or not you've made monthly consumer credit payments and when they were paid.
- Payment information: If a lender gave a credit reporting body default information about you and the overdue amount is paid, a statement that the payment has been made.
- New arrangement information: If a lender gave a credit reporting body default information about you and your consumer credit contract is varied or replaced, a statement about this.

The credit reporting agencies we use are:

Equifax: <https://www.equifax.com.au/>

Experian: <https://www.experian.com.au/>

Illion: <https://www.illion.com.au/>

What sensitive information do we collect?

Sometimes we need to collect sensitive information about you. This could include information about your health or reasons relating to hardship. Unless required by law, we will only collect sensitive information with your consent.

When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information (ie: we require personal information to verify your identity under Commonwealth Anti-Money Laundering Law).

How we collect your information from other sources

Sometimes we collect information about you from other sources. We may collect information about you that is publicly available (for example from public registers or social media) or made available by third parties. For instance, we do this where:

- We are unable to contact you and need to update your contact details.
- We need information for fraud prevention purposes.
- It can provide insight about your financial needs, such as through property information.
- You have consented to third parties sharing it with us.

- At your request, we exchange information with your legal or financial advisers or other representatives.

We may use or disclose information about you in order to combine the information that we hold with information collected from or held by external sources.

What if you don't want to provide us with your personal information?

If you don't provide your personal information to us, we may not be able to:

- Manage or administer your account.
- Verify your identity or protect against fraud.

What do we do when we get information we didn't ask for?

Where we receive unsolicited information, we will check whether that information is reasonably necessary for our functions or activities. If it is, we will handle this information in the same manner as is set out in this Policy. If it is not necessary, we will ensure we do the right thing and destroy or de-identify it.

How do we take care of 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, interference, loss, unauthorised access, modification or disclosure.

Some of the ways we do this are:

- Confidentiality requirements and privacy training of our employees.
- Document storage security policies.
- Security measures to control access to our systems and premises.
- Only giving access to personal information to a person who is verified to be able to receive that information.
- Ensuring third parties meet CCC Financial Group's privacy obligations.
- Electronic security systems, such as firewalls and data encryption on our websites.

We may store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

What happens when we no longer need your information?

We will only keep your information for as long as we require it for our purposes. We are also required to keep some of your information for certain periods of time under law (ie: under the *Corporations Act 2009 (Cth)* or the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*). When we no longer require your information, we will ensure that your information is destroyed or de-identified.

Use and disclosure

CCC Financial Solutions Group will not use personal information concerning an individual for a purpose other than the primary purpose for which it was collected, unless CCC Financial Solutions Group or its client has obtained the consent of the individual to the use of that information for a secondary purpose, such as direct marketing.

If it is not practicable to obtain the individual's consent and the individual has made known to CCC Financial Solutions Group or its client of their desire not to receive any further direct marketing communications, these activities will cease.

Personal information collected and/or stored for one client is never used for, or disclosed to, another client or to any other third party.

Document uncontrolled when printed. Electronic version on the intranet is the controlled version. Before using a printed copy, verify that it is the current version.	Z:\Policy\CCC Financial Solutions Group\Privacy Policy.docx	Owner: Alicia Labrosciano	Last saved date: 16/10/2020 12:13:00 PM	Page 5 of 7
---	---	---------------------------------	---	-------------

Access and correction

On request by an individual, but subject to the exceptions prescribed by the *Australian Privacy Principals* (APPs), either CCC Financial Solutions Group or its client for whom the information is held will provide the individual with access to their personal information and will allow that individual a reasonable opportunity to correct any inaccuracies or out-of-date information.

A request for access to the personal information held by CCC Financial Solutions Group concerning an individual can be made to the CCC Financial Solutions Group Privacy Committee on the numbers or address mentioned below or, if so specified, to a CCC Financial Solutions Group client.

Openness

On request by individuals, CCC Financial Solutions Group will make known to those individuals the types of personal information it holds, the purpose for which it is held and how CCC Financial Solutions Group collects, holds and uses that information.

Subcontractors

CCC Financial Solutions Group requires strict compliance with the *Australian Privacy Principals* (APPs) by all subcontractors.

Trans border data flows

CCC Financial Solutions Group will not transfer personal information relating to an individual outside of Australia unless the individual has consented to such a transfer or CCC Financial Solutions Group has satisfied itself that the recipient of the personal information will uphold principles for the handling of personal information which are similar to the Australian Privacy Principals (APPs).

Contacting CCC Financial Solutions Group

Any questions or comments concerning CCC Financial Solutions Group privacy policies and practices, any requests for access to an individual's personal information held by CCC Financial Solutions Group and any general privacy inquiries can be addressed to:

The Privacy Officer
PO Box 154
Rundle Mall SA 5000

Phone: 1300 039 998 or (08) 8211 8299

Fax: (08) 8212 1664

Email: enquiries@cccfinancial.com.au

Credit information complaints

If your complaint is about your credit information, we may need to check with credit reporting bodies or the credit provider involved.

What else can you do?

If you are not satisfied with how we manage your Privacy Complaint or our decision after you have been through our internal dispute resolution process, you can contact the Australian Financial Complaints Authority (AFCA).

If your complaint is about how we handle your personal information, you can also contact the Office of the Australian Information Commissioner (OIAC).

AFCA

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

OIAC

Website: www.oaic.gov.au/

Email: enquiries@oaic.gov.au

Telephone: 1300 363 992 (free call)

Related Documents

Dispute Resolution Procedure

Australian Privacy Principles (APPs)

Email and IT Usage Procedure

IT Security Procedure

Privacy Act 1988 (Cth)

Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)

Privacy Regulation 2013 (Cth)