

# Respecting your privacy

This privacy policy applies to you, if you are an individual who is, or who is the director, partner or proprietor of:

- a broker or an entity that has applied to be appointed as a broker (each a “Broker”) of Professional Lenders Association Network of Australia Pty Ltd as trustee for the PLAN Australia Unit Trust (PLAN Australia) ABN 24 086 084 832;
- a credit representative or a Broker or a Loan Writer that has applied to be appointed as a credit representative (each a “Credit Representative”) of BLSSA Pty Ltd ABN 69 117 651 760 (BLSSA);
- a loan consultant (Loan Writer) of a Broker;
- a referrer (Referrer) to a Broker or a Loan Writer; or
- a third party (Third Party), with whom a Broker shares commissions,

or if you give us information in relation to any product or service administered by PLAN Australia or BLSSA.

We respect your personal information, and this Privacy Policy explains how we handle it. We are grateful for the trust and confidence you have in us to safeguard your privacy. The policy covers BLSSA and PLAN Australia. Each of BLSSA and PLAN Australia is a member of the National Australia Bank Group (the Group) of companies.

In this privacy policy, “we” or “us” means either of BLSSA or PLAN Australia. Each of us is a member of the National Australia Bank Group (the Group) of companies.

**By providing personal information to us, you consent to the collection, use and disclosure of your information in accordance with this Policy and any other arrangements that apply between us.** As some of our related companies may have specific legal requirements, they may have separate, but consistent policies. Please view these if they are more relevant to your relationship with the Group.

## What personal information do we collect and hold?

### General information

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth (this may also include voice biometrics, where permitted);
- other contact details such as social media handles;
- financial details such as your tax file number and bank account, superannuation or insurance policy information;
- credit information such as details relating to credit history, credit capacity, and eligibility for credit (‘credit worthiness’); and
- other information we think is necessary.

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

## Information from a credit reporting body

When we're checking your credit worthiness and at other times, we might collect information about you that you obtain from credit reporting bodies.

## What sensitive information do we collect?

Sometimes we need to collect sensitive information<sup>1</sup> about you. For instance, in relation to some insurance applications we do on behalf of others. This could include things like medical checks, medical consultation reports or other information about your health. 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 which require us to collect personal information, like the National Consumer Credit Protection Act.

## What do we collect via your website activity?

When you use our websites or mobile applications we may collect information about your location or activity including IP address, telephone number and whether you've accessed a third party site.

If you use our website or our programs, we may monitor your use of the website and our programs. This is done to ensure we can verify you and can receive information from us, and to identify ways we can improve our services for you and to understand you better.

We also know that some customers like to engage with us through social media channels. We may collect information about you when you interact with us through these channels. However for all confidential matters, we'll ensure we interact with you via a secure forum.

To improve our services and products, we sometimes collect de-identified information from users of our website or our programs. That information could include IP addresses or geographical information to ensure your use of our web and our programs is secure.

We also collect de-identified information if you use our website or our programs. Although the information collected does not identify an individual, it does provide us with useful statistics so that we can analyse and improve our web services and programs.

Some of this website or program information is collected using cookies. The cookies allow us to track website usage patterns and to compile data that can help us improve our web content.

For more information on how we use cookies and tracking tags see our Cookies Policy [www.advantedge.com.au/cookies](http://www.advantedge.com.au/cookies)

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<sup>1</sup> Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

We also collect de-identified information from the online interactions of users who are not customers that use our online services. Much of this data collection is done through the use of cookies and used to improve our services and enhance users online experience with us e.g. website statistics and does not identify individual customers but does identify internet browser. Where we do identify you (such as where customers are logged onto our online services), we treat any use or disclosure in accordance with this policy.

## How do we collect your personal information?

### How we collect and hold your information

There are many ways we seek information from you. We might collect your information when:

- a Credit Representative fills out an application (the Credit Representative Application) and information supporting the Credit Representative Application. That information may include a credit report about you that you obtain for us;
- a Broker fills out an application (the Broker Application) and information supporting the Broker Application. That information may include a credit report about you that you obtain for us;
- a Loan Writer fills out an application for accreditation (Accreditation Application) to present loan applications to our panel lenders on the Broker's behalf and information supporting the Accreditation Application;
- a referrer notification (Referrer Notification) is filled out to notify us of the Broker's arrangement with a Referrer; or
- a third party notification (Third Party Notification), is filled out to notify us of a Broker's arrangement with a Third Party.

In addition, when you use our website or mobile applications we may collect information about your IP address, location or activity. We also find using electronic means, such as email or SMS, a convenient way to communicate with you and to verify your details, including doing e-verification of identity (e-Know Your Customer). However, we'll never ask you for your security details in this way – if you are ever unsure, just contact us.

We will try to collect personal information directly from you unless it's unreasonable or impracticable. For this reason, it's important that you keep your contact details up-to-date.

### 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, social media or made available by third parties. We do this where:

- we distribute or arrange products on behalf of others, including our trusted partners;
- we can't get hold of you and need to update your contact details;
- we need information from third parties about an application you make through us;
- you have consented to third parties sharing it with us, such as:
  - organisations we sponsor or have loyalty programs with;
  - media organisations, and social networking sites; and

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

Also:

- we may obtain information from the police or from ASIC or other government authorities to check your probity and assist it to assess the broker application or the credit representative application;
- we may obtain information from financial institutions on the Aggregator's panel of financial institutions relating to application conversion ratios, application submission quality and use of online services;
- in the case of the BLSSA, we may obtain information from our insurance broker or the insurer that supplies Group Professional Indemnity Insurance cover to BLSSA's credit representatives relating to your request to opt in to that cover;
- we may obtain information from other sources referred to in the Credit Representative Application, Broker Application, Accreditation Application, Referrer Notification or Third Party Notification, if we consider it necessary;
- if you are the director, partner or proprietor of a Credit Representative, Broker, Loan Writer, Referrer or Third Party, we may collect information about you from the Broker on whose behalf you or the Loan Writer or Referrer conducts business or refers clients or with whom the Third Party shares commissions; and
- we may ask for other information from you from time to time to enable us to improve our services or to review the general needs of Credit Representatives, potential Credit Representatives, Brokers and potential Brokers.

From time to time, we may request information about Brokers and Loan Writers from our panel lenders relating to loan application conversion ratios, use of online services and loan application submission quality.

#### *Customer insights*

We may use or disclose information about you in order to combine the information that we hold about you with information about you collected from or held by external sources. We do this in order to enable the development of consumer insights about you so that we can serve you better. This includes being able to better understand your preferences and interests, personalise your experience, enhance the products and services you receive, and to tell you about products and services that may be of interest to you. Where those insights are provided to others, such insights are based on aggregated information and do not contain any information that identifies you. We may also use service providers to undertake the process of creating these consumer insights.

#### **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:

- consider a Credit Representative Application, Broker Application, Accreditation Application, Referrer Notification or Third Party Notification;
- provide you with the product or service you want;
- personalise your experience with us;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services from across the Group that might better meet your financial, e-commerce and lifestyle needs.

#### **How we collect and hold your credit information**

We will collect your credit information from details included in a Credit Representative Application or Broker Application. In addition to what we say above about collecting information from other sources, other main sources for collecting credit information are:

- other credit providers;
- your referees;
- your agents and other representatives like your accountants or solicitors;
- bodies that issue identification documents to help us check your identity; and
- our service providers involved in helping us to provide credit or to administer credit, including our debt collectors and our legal advisers.

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

Because we are a big organisation, people often share information with us we haven't sought out. Where this happens, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

### When will we notify you that we have received your information?

When we receive personal information from you, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Where we collect your personal information from third parties (and you're not necessarily aware), if that information can be used to identify you, we will take reasonable steps to notify you of the circumstances of that collection. We recommend our customers regularly review our website to review updates to this policy and our Privacy Notice (<http://www.planaustralia.com.au/privacy-policy>).

### 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 and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements of our employees;
- document storage security policies;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites.

We can 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'll only keep your information for as long as we require it for our purposes. We're also required to keep some of your information for certain periods of time under law, such as the Corporations Act, for example. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

## How we use your personal information

What are the main reasons we collect, hold and use your information?

Because we offer a range of services and products, collecting your personal information allows us to provide you with the products and services you've asked for. This means we can use your information to:

- provide you with information about products and services, including financial help, guidance and advice;
- consider a Credit Representative's or a Broker's request for products and services, including eligibility for those products and services;
- process a Credit Representative Application, a Broker Application, an Accreditation Application, a Referrer Notification or a Third Party Notification and provide products and services; and
- administer our relationship with the Credit Representative, Broker, Loan Writer, Referrer or Third Party which includes answering requests and complaints, taking any required legal action in connection with that relationship, conducting market research and generally managing the products and services we supply.

Can we use your information for marketing our products and services?

From time to time, we'd like to share what we know about our products and Group products with you. We may use or disclose your personal information to let you know about products and services from across the Group that might be of interest to you. We will not do this if you tell us not to. Unless you tell us not to, we may disclose your personal information to our related companies or to our trusted partners so they can tell you about their products and services.

We may conduct these marketing activities via email, telephone, SMS, iM, mail, or any other electronic means, including targeted advertising through NAB Group or non-Group websites. We may also market our products to you through third party channels (such as social networking sites) or via other companies who assist us to market our products and services. If you don't want to receive marketing offers in this way, please contact us.

Where we market to prospective customers, we are happy to let them know how we obtained their information and will provide easy to follow opt-outs.

We may also disclose your personal information to companies outside the NAB Group who assist us to market our products and services to you. With your consent, we may disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organisation outside of the Group.

### **Yes, You Can Opt-Out**

You can let us know at any time if you no longer wish to receive direct marketing offers from the Group (see 'Contact Us'). We will process your request as soon as practicable.

We know that you may prefer to receive some types of messages over others, so where possible we will offer you a choice. You can always change your mind or update these choices too.

Where you have subscribed to something specific (like to hear from one of our sponsored organisations) then these subscriptions will be managed separately. If you no longer wish to receive these emails click the unsubscribe link included in the footer of our emails.

## What are the other ways we use your information?

We've just told you some of the main reasons why we collect your information, so here's some more insight into the ways we use your personal information including:

- giving you information about a product or service;
- considering whether you are eligible for a product or service;
- processing your application and providing you with a product or service;
- administering the product or service we provide you, which includes answering your requests and complaints, varying products and services and managing our relevant product portfolios;
- identifying you or verifying your authority to act on behalf of a Credit Representative, a Broker, a Loan Writer, a Referrer or a Third Party;
- telling you about other products or services that may be of interest to you, or running competitions and other promotions (this can be via email, telephone, SMS, iM, mail, or any other electronic means including via social networking forums), unless you tell us not to;
- identifying opportunities to improve our service to you and improving our service to you;
- assisting in arrangements with other organisations (such as loyalty partners) in relation to a product or service we make available to you;
- allowing us to run our business and perform administrative and operational tasks (such as training staff, risk management; developing and marketing products and services, undertaking planning, research and statistical analysis; and systems development and testing);
- determining whether a beneficiary will be paid a benefit;
- preventing or investigating any fraud or crime, or any suspected fraud or crime;
- as required by law, regulation or codes binding us;
- maintaining a database of Brokers, Loan Writers, Referrers and Third Parties, to, amongst other things, track and make payments of commissions and other amounts to them;
- managing our relationship with you;
- managing our relationships with our panel lenders;
- investigating and dealing with suspected or actual unlawful activity;
- assisting in improving industry standards relating to engaging in credit activities; and
- assisting with recovering amounts owing to us; and
- for any purpose for which you have given your consent.

## Who do we share your personal information with

**To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others.** We may share your information with other organisations and Group members for any purposes for which we may use your information.

### Sharing with the Group

We may share your personal information with other Group members. This could depend on the product or service you have applied for and the Group member you are dealing with, but

will not differ from those purposes outlined above. Where appropriate we may integrate the information we hold across the NAB Group to provide us with a complete understanding of your product holdings and your needs.

## Sharing at your request

We may share your personal information with:

- your representative or any person acting on your behalf (for example, accountants or solicitors); and
- your referees to confirm details about you.

## Sharing with third parties

We may share your personal information with third parties outside of the Group, including:

- our panel lenders;
- industry bodies of which we are a member;
- lender's mortgage insurers or title insurers;
- in the case of the Licensee, its insurance broker or the insurer that supplies Group Professional Indemnity Insurance cover to the Licensee's credit representatives, but only if you are considering opting in, or have opted in, to that cover;
- those involved in providing, managing or administering the product or service we provide to you;
- authorised representatives of the Group who sell products or services on our behalf;
- superannuation and managed funds organisations, and their advisers;
- medical professionals, medical facilities or health authorities who verify any health information you may provide;
- valuers, insurers (including lenders' mortgage insurers and title insurers) , re-insurers, claim assessors and investigators;
- brokers or referrers who refer your application or business to us;
- other financial institutions, such as banks;
- organisations involved in debt collecting, including purchasers of debt;
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- organisations involved in surveying or registering a security property or which otherwise have an interest in such property;
- real estate agents;
- organisations we sponsor and loyalty program partners, including organisations the NAB Group has an arrangement with to jointly offer products or has an alliance with to share information for marketing purposes;
- government or regulatory bodies (including the Australian Securities and Investments Commission and the Australian Tax Office) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities);
- media or social networking sites that provide us with opportunities to place messages in front of you;
- our accountants, auditors or lawyers and other external advisers;
- rating agencies to the extent necessary to allow the rating agency to rate particular investments;
- guarantors and prospective guarantors of your obligations to us;
- organisations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;



- organisations that participate with us in payments systems including merchants, payment organisations and organisations that produce statements for us;
- our joint venture partners that conduct business with us;
- organisations involved in a corporate re-organisation or transfer of Group assets or business;
- organisations that assist with our product planning, analytics, research and development;
- mailing houses and telemarketing agencies and media organisations who assist us to communicate with you;
- other organisations involved in our normal business practices, including our agents and contractors as well as our accountants, auditors or lawyers and other external advisers; and
- where you've given your consent.

## Sharing outside of Australia

The Group runs its business in Australia and overseas. Group members may need to share some of your information (including credit information) with organisations outside Australia. Sometimes, they may need to ask you before this happens. You can view a list of the countries in which those overseas organisations are located at [www.nab.com.au/privacy/overseas-countries-list/](http://www.nab.com.au/privacy/overseas-countries-list/)

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

## How do you access your personal information?

How you can generally access your information

We'll always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us in writing to access your personal information that we hold. In some cases we may be able to deal with your request over the phone.

We will give you access to your information in the form you want it where it's reasonable and practical (such as a copy of a phone call you may have had with us – we can put it on a disk for you). We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first.

If we can't give you access, we will tell you why in writing. If you have concerns, you can complain. See 'Contact Us'.

## How do you correct your personal information?

How we correct your information

Contact us if you think there is something wrong with the information we hold about you.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

## How do you make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us.

You can contact us by using the details below:

The Privacy Officer  
Advantagedge Financial Services Pty Ltd  
Level 10, 101 Collins Street  
Melbourne Vic 3000

Telephone: 03 8616 1600

Email address: [privacyofficer@advantagedge.com.au](mailto:privacyofficer@advantagedge.com.au)

If you have contacted us by phone or in person and feel your issue still hasn't been resolved, the next step is to contact our Customer Resolutions team

Complaints and Disputes  
Resolution Officer  
Advantagedge Financial Services Pty Ltd  
P.O. Box 626 Collins Street West  
Melbourne Vic 8007

Telephone: 03 8616 1377 or 03 8616 1000

Email address: [complaints@advantagedge.com.au](mailto:complaints@advantagedge.com.au)

### **Need more help?**

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:

- **Online:** [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)
- **Phone:** 1300 363 992
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- **Fax:** +61 2 9284 9666
- **Mail:** GPO Box 5218 Sydney NSW 2001 or GPO Box 2999 Canberra ACT 2601

### **What if you want to interact with us anonymously or use a pseudonym?**

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way however as we are often governed by strict regulations that require us to know who we're dealing with.

## **Changes to this Privacy Policy**

This Policy may change. We will let you know of any changes to this Policy by posting a notification on our website.

## **Contact Us**

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by using the details below:

The Privacy Officer

Advantagedge Financial Services Pty Ltd

Level 10, 101 Collins Street

Melbourne Vic 3000

Telephone: 03 8616 1600

Email address: [privacyofficer@advantagedge.com.au](mailto:privacyofficer@advantagedge.com.au)