

Financial Freedom Privacy Policy 2021

We have endeavoured to keep our privacy policy and terms & conditions in plain English to ensure it is easy to read and comprehend for all of our customers.

Our Privacy Commitment

Financial Freedom Australia Pty Ltd (Financial Freedom) is committed to protecting your privacy. This privacy policy has been developed to ensure that your personal information is kept secure and confidential. We are committed to complying with the Privacy Act 1988 (Cth) (Privacy Act) which sets out a number of Australian Privacy Principles (APPs).

Further information on privacy can be obtained from the website of the Office of the Australian Information Commissioner at www.oaic.gov.au. This policy applies to any dealings and interactions with us – in person, online, over the phone, fax or mail, web chat or any other form of communication).

What kinds of information do we collect and hold?

The kinds of personal information we collect, and hold can include:

- your contact details and other identifying information such as name, date of birth, address, phone number and email address;
- your current financial status, credit history, number of dependents, employment status and other such information;
- your financial information including your occupation or business activities, income, expenses, repayment capacity, assets, liabilities and other related information;
- your credit information such as credit history, credit worthiness and credit eligibility information;
- your government identifiers such as your tax file number, drivers license number, Medicare number and/or pension card number and other such information
- your payment information such as BSB and account number, credit card number or alternative payment method details.

We do not generally collect sensitive information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership status of professional or trade associations, membership status of a trade union, or details of health, disability, sexual orientation, or criminal record. If we need to obtain this type of information, we will ask for your consent, except where otherwise permitted by law.

How do we collect and hold personal information?

Financial Freedom collects personal information in a number of ways. These include:

- Directly from you, during our interactions with you or when you access or use our online services such as our website, portal or social media and through the use of cookies;
- Directly from your creditors or any other relevant third party authorised by you;
- Via third party information service providers.

We endeavour to maintain the relevance, reliability, accuracy, completeness, and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

You may choose to contact us anonymously where it is lawful and practicable to do so – for example, if you telephone us requesting our postal address. You will also be able to use our public website anonymously. However, if you do not identify yourself, we will only be able to give you general information and we may not be able to provide the full services you need. Please note that calls between clients and the contact centre may be monitored and/or recorded for our records, as well as for training and quality purposes.

Your personal information will be held in numerous ways including:

- Physically at our premises (securely);
- Electronically;
- On a private cloud securely; and
- On our website.

We take reasonable steps to protect and secure your personal information in ways including:

- Using secure servers to store personal information;
- Using unique usernames, passwords and other protections including firewalls on systems that can access personal information; and
- By maintaining physical security over our paper and electronic data stored at our premises, by using deadlocks and alarm monitoring security systems.

Why do we collect, use or disclose personal information?

We collect, use and disclose your personal information for the purpose of efficiently and effectively carrying out services including:

- Helping you with your budgeting needs;
- Dealing with lenders and other creditors on your behalf;
- Providing debt management and personal financial management services, and payment arrangements;
- Administering our products and services;
- Manage our relationship with you;
- Manage our risks and help identify and investigate illegal activity such as fraud;
- Conduct and improve our businesses and improve the customer experience;
- Comply with our legal obligations and assist government and law enforcement agencies or regulators;
- Identify and tell you about other products or services that we think may be of interest to you.

If at any stage you wish to stop receiving direct marketing material, you may contact us with this request by using our contact information below.

How is your information kept up to date?

It is important that the information we hold about you is current. To ensure we are able to maintain relevant, reliable, accurate, complete and current personal information we request that you:

- Inform us of any errors in your personal information as soon as possible;
- Update us with any changes to your personal information as soon as possible.

How can you access your information we hold?

You have a right to access your personal information, subject to certain exceptions allowed by the law. You may request access to your personal information or for your personal information to be corrected by using the contact details in this section. We may not disclose personal information to you without proof of identity.

We will never charge you for placing a request to access your personal information, and, in most circumstances, we will not charge you for providing such access. However, if you request information which is of a particularly large volume or is otherwise onerous, Financial Freedom reserves the right to charge a reasonable fee to compensate us for time spent servicing your request.

If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

We may deny access to personal information if:

- The request for information is frivolous or vexatious;
- Providing access would have an unreasonable impact on the privacy of another person;
- Providing access would pose a serious and imminent threat to the life or health of any person or to public health or public safety;
- The information is 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 authorised by or under an Australian law or an order of a court or tribunal;
- We have reason to suspect that unlawful activity; or misconduct of a serious nature, that relates to our function or activities has been or may be engaged in and the giving of access would be likely to prejudice the taking of appropriate action in relation to the matter;
- providing access would be likely to prejudice enforcement related activities conducted by or on behalf of an enforcement body, or an enforcement body requests that access not be provided on the grounds of national security;
- providing access would reveal evaluative information generated by us in connection with a commercially sensitive decision-making process;
- there are other legal grounds to deny the request.

Do we disclose your personal information?

The organisations which we disclose information may include:

- Compliance consultants to ensure that our representatives are meeting our compliance standards;
- Your professional advisors, including your solicitor or accountant, as authorised by you;
- Our external service providers and other third parties that assist us to provide our services to you;
- Your lenders and other creditors;
- Government and regulatory authorities and other organisations, as required or authorised by law – for example, to government or regulatory bodies for purposes related to the prevention of money laundering, public health or safety, the prevention or detection of unlawful activities or to protect public revenue;
- Third parties for the purpose of resolving complaints or disputes, including beyond the end of your contract;
- Product planning and development officers;
- Research bodies for the purpose of improving our current and future services;
- Third parties for the purpose of securing credit on your behalf, as authorised by you;
- Your creditors with whom we are making payment arrangements, or other services as authorised by you; and
- Relevant authorities, if we have reason to believe that you or another person is in danger.

We may need to transfer some of your information overseas if we are making an arrangement with an overseas creditor on your behalf. The information we may transfer includes your identifying details, such as name, date of birth and address; details of other payments you are required to make; and information about changes in your personal and financial situation, only to the extent that is necessary to create the payment arrangement.

From time to time, Financial Freedom uses overseas third-party service providers to assist with activities such as data collection, processing, analysis and storage, marketing optimisation, contract provision and sending surveys or emails to many clients at once.

We may disclose information to the following credit reporting bodies:

Illion

Phone: 13 23 33

Website: www.illion.com.au

Experian

Phone: 1300 783 684

Website: www.experian.com.au

Equifax

Phone: 1300 921 621

Website: www.equifax.com.au

Our website security

On our websites you may apply for services or communicate with us via web message. You may also access site information without revealing your personal identity. We use multiple levels of security to protect the information you provide us online.

The application information we accept online relies on industry standard “Secure Sockets Layer” (SSL) encryption to secure your transaction information and communication. Financial Freedom’s computer system uses software programs to create summary statistics, which are used for such purposes as assessing which information is of most and least interest to members, determining technical design specifications, and identifying system performance or problem areas.

Our websites utilise cookies to provide you with a better user experience. Cookies are small pieces of information that a site or its service provider transfers to your computer’s hard drive through your web browser. Cookies enable us to recognise your browser, and capture and remember certain information. Most browsers allow you to disable cookies. Please refer to the help menu on your browser for more information.

We use first-party cookies and third-party cookies to help us compile and monitor aggregate data about site traffic and site interaction. This will allow us to offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers may use the information collected on our behalf to help us conduct and improve our business.

Third party vendors, including Google, show our ads on websites and may serve these ads based on a user’s prior visits to our website (for example, through remarketing to site visitors who have not made contact with us, limiting marketing which existing clients receive, or remarketing to a visitor who has made an enquiry but not attended an appointment with us). We may also use data from Google Analytics to optimise our ad campaigns based on your prior visits to our website.

You may opt out of Google’s use of cookies by visiting the Google advertising opt-out page (<https://www.google.com/settings/ads/plugin>).

You may opt out of our use of Google Analytics by visiting the Google Analytics opt-out browser add-on (<https://tools.google.com/dlpage/gaoptout>).

Who to contact?

You may make a complaint or request to access or correct personal information held by us with the following contact information:

Financial Freedom Australia

PO Box 2284, Milton QLD 4064

www.financialfreedomaustralia.com.au

Request/Correct personal information:

enquiries@financialfreedomaustralia.com.au

Make a complaint:

complaints@financialfreedomaustralia.com.au

How can you make a complaint to an external body?

If you are dissatisfied with our response to your complaint, you can also contact the following external sources:

Australian Financial Complaints Authority

Phone: 1800 931 678 (free call)

Email: info@afca.org.au

Website: www.afca.org.au

Postal Address: GPO Box 3, Melbourne VIC 3001

Office of the Australian Information Commissioner

Phone: 1300 363 992

Website: www.oaic.gov.au