

# Choice Aggregation Services and BLSSA Privacy Notice and Consent

This privacy notice and consent relates to personal information Pennley Pty Ltd as trustee for the Pennley Unit Trust ABN 53 348 526 415 (the Aggregator) or BLSSA Pty Ltd ABN 69 117 651 760 (the Licensee) collects or has collected about you.

This privacy notice and consent:

- replaces any prior privacy notice and consent the Aggregator or the Licensee or both issued or took from you; and
- includes consents from you to allow each of the Aggregator and the Licensee to collect certain information about you.

In this privacy notice and consent:

- the mortgage broker, contracted to the Aggregator or the Licensee and with whom you are associated, is referred to as a Broker; and
- the loan consultant, of a Broker and with whom you are associated, is referred to as a Loan Consultant.

## PRIVACY NOTICE

This privacy notice tells you how the Aggregator and the Licensee collect your information, what each of them uses the information for and who each of them share the information with. If either the Aggregator or the Licensee collects information that can be used to identify you, it will take reasonable steps to notify you of that collection.

### How information is collected from you

Each of the Aggregator and the Licensee will collect your information from you directly whenever it can. It obtains most of the information directly from you through requests you or the Broker or the Loan Consultant make of it or requests it makes of any of you, the Broker or the Loan Consultant. Also, it may:

- obtain information from other sources referred to in those requests, if it considers it is reasonably necessary to do so; and
- ask for other information from you from time to time to enable it to improve its services or to review the general needs of brokers, potential brokers, loan consultants, potential loan consultants, credit representatives and potential credit representatives.

Each of the Aggregator and the Licensee may verify that information from sources referred to in requests any of you or a Broker or a Loan Consultant make of it or in this privacy notice and consent.

### How information is collected from other sources

Sometimes the Aggregator or the Licensee will collect information about you from other sources as the Privacy Act 1988 permits. It will do this only if it's reasonably necessary to do so, for example, where it:

- obtains information from the Broker or the Loan Consultant;
- obtains information from the police or from ASIC or other government authorities to check your probity and assist it to assess the requests any of you or a Broker or a Loan Consultant make of it;
- obtains 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 Licensee, obtains information from its insurance broker or the insurer that supplies Group Professional Indemnity Insurance cover to the Licensee's credit representatives relating to a request by you or a Broker or a Loan Consultant to opt in to that cover;
- can't get hold of you and it relies on publicly available information to update your contact details; or
- at your request, exchanges information with your legal or financial advisers or other representatives.

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

- we distribute or arrange products on behalf of others, including our business 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;
- we need information for fraud prevention purposes;

- we are checking the security you are offering;
- we can learn insight about your financial needs, such as through property information;
- you have consented to third parties sharing it with us, such as organisations we sponsor or have loyalty programs with; or
- 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 about you with information about you collected from or held by external sources.

### **When the law authorises or requires collection of information**

There are laws (like the National Consumer Credit Protection Act) that affect organisations that may require each of the Aggregator or the Licensee to collect personal information about you.

### **How your information may be used**

The Aggregator or the Licensee may use your information for purposes relating to:

- processing requests you make of it;
- managing and better understanding its relationship with you or the Broker or the Loan Consultant including tracking and making payments due to you or the Broker or the Loan Consultant;
- managing its relationship with financial institutions on the Aggregator's panel of financial institutions;
- identifying opportunities to improve our service to you and improving our service to you;
- allowing it to run its business efficiently and to perform administrative and operational tasks;
- preventing or investigating any fraud or crime or any suspected fraud or crime;
- assisting in improving industry standards relating to engaging in credit activities;
- assisting it to recover amounts payable by you or the Broker or the Loan Consultant to it;
- telling you about other products or services it or its related companies make available and that may be of interest to you, unless you tell it not to;
- as required by law, regulation or codes binding it; and
- any purpose to which you have consented.

You can let the Aggregator or the Licensee know at any time if you no longer wish to receive direct marketing offers from it. It will process your request as soon as practicable.

### **What happens if you don't provide information**

If you don't provide your information to the Aggregator or the Licensee, it may not be possible for it to:

- consider a request you or a Broker or a Loan Consultant make of it; or
- provide other services to you or the Broker or the Loan Consultant.

### **Sharing Your Information**

#### Sharing with related companies

Each of the Aggregator and the Licensee may share your information with its related companies for any of the purposes described above. Where appropriate we integrate the information we hold across the National Australia Bank Group (NAB Group), of which we are a member, to provide us with a complete understanding of you and your needs.

#### Sharing with your representatives and referees

Each of the Aggregator and the Licensee may share your information with:

- your representative or any person acting on your behalf (for example, lawyers or accountants); and
- your referees to make reasonable enquiries with respect to a request you or the Broker or the Loan Consultant make of it and any services related to that request.

#### Sharing with third parties

The Aggregator or the Licensee may share information about you with third parties, in relation to: considering a request you or the Broker or the Loan Consultant make of it; administering its arrangements with you or the Broker or the Loan Consultant; or any other purpose noted above. Those third parties may include:

- the Broker or the Loan Consultant;
- financial institutions on the Aggregator's panel of financial institutions;
- other participants in the mortgage industry or with industry bodies of which the Aggregator or the Licensee is a member for general information or to assist with improving industry standards relating to engaging in credit activities;

- 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 or the Broker or the Loan Consultant are considering opting in, or have opted in, to that cover;
- authorities that issue documents you give us to identify you to enable us to verify the status of, and any information contained in, the document;
- 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);
- 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 the information with relevant foreign authorities;
- ratings agencies, but only to the extent necessary to allow the ratings agency to rate particular investments;
- companies we arrange or distribute products for;
- our joint venture partners that conduct business with us;
- organisations that wish to take an interest in the Aggregator's or the Licensee's business or assets;
- organisations involved in a corporate re-organisation or transfer of NAB Group assets or business;
- payment system operators, but only to the extent necessary to investigate or correct payments made by the Aggregator or the Licensee to you or the Broker or the Loan Consultant or payments you or the Broker or the Loan Consultant make to either the Aggregator or the Licensee;
- 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 (e.g. consultants and any independent customer advocates);
- service providers, agents, contractors and advisers that assist it to conduct its business; and
- where you've given your consent or at your request, including to your representatives or advisors.

Also, each of the Aggregator or the Licensee may disclose your information, in relation to other services it provides under its arrangements with you or the Broker or the Loan Consultant, to others including:

- organisations that maintain, review and develop its business systems, procedures and technology infrastructure, including testing or upgrading their computer systems;
- organisations that assist it with product planning, analytics, research and development; and
- mailing houses and telemarketing agencies and media organisations that assist it to communicate with you, including media or social networking sites.

#### Sharing outside of Australia

The Aggregator or the Licensee 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.

#### **Accessing your Information**

You can ask the Aggregator or the Licensee to access information it holds about you. You can find out how to access your information by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the Aggregator or the Licensee using the contact details in the schedule.

#### **Correcting your Information**

You can ask the Aggregator or the Licensee to correct information it holds about you. You can find out how to correct your information by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the Aggregator or the Licensee using the contact details in the schedule.

#### **Complaints**

If you have a complaint against either the Aggregator or a Licensee about a privacy issue, please tell them. You can find out how to make a complaint and how the Aggregator or the Licensee will deal with a complaint by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the Aggregator or the Licensee using the contact details in the schedule.

#### **Privacy Policy**

You can find out more about how each of the Aggregator and the Licensee manages your information by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the

Aggregator or the Licensee using the contact details in the schedule. Also, you can read and obtain a copy of that policy at their website address set out in the schedule.

### **Information about other people**

If you give information to the Aggregator or the Licensee about another person (like your loan writers or referees or the Broker or the Loan Consultant) in relation to a request you make of it, you will let that other person know that:

- the Aggregator or the Licensee has collected their information to assess that application, to manage its relationship with you or the Broker or the Loan Consultant or for any other purpose set out in the privacy notice above;
- the Aggregator or the Licensee may exchange this information with other organisations set out in that privacy notice;
- the Aggregator or the Licensee handles their personal information in the way set out in its Privacy Policy and this privacy notice and consent and they can:
  - access or request a copy of that Privacy Policy or this privacy notice and consent; or
  - access the information the Aggregator or the Licensee holds about that other person, by using the contact details for the Aggregator or the Licensee (as the case may be) set out in the schedule; and
- the Aggregator or the Licensee may not consider the request you make of it, unless it obtains their information.

### **Consent**

You consent to each of the Aggregator and the Licensee:

- collecting information about your membership of a mortgage industry association; and
  - collecting information about criminal records relating to you,
- when you give it that information in a request you make to it or following a request it makes of you.

### **SCHEDULE**

Pennley Pty Ltd atf the Pennley Unit Trust ABN 53 348 526 415 and BLSSA Pty Ltd ACN 117 651 760

The Privacy Officer

Advantage Financial Services Pty Ltd

Level 10, 101 Collins Street

Melbourne Vic 3000

Telephone: 03 8616 1600

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

Our privacy policy can be accessed at <http://www.choiceaggregationservices.com.au/privacy>.