

Trans Pacific Holdings (Aust) Pty Ltd (TPH)

The kinds of personal information we collect and hold

We generally collect and hold the following kinds personal information relating to our clients:

- name, date of birth, address, telephone number, email address or other contact details;
- information that we require to identify our clients, including details of our clients' passport or driver's licence;
- information relevant to the financial services that we provide to our clients, including information about our clients' financial position, such as:
 - details of our clients' assets and liabilities, including our clients' investments and any existing debts;
 - details of our clients' income, including our clients' employment status, occupation and the name of our clients' employer;
 - proof of our clients' financial position, including for example pay slips or tax statements;
 - other details relevant to a finance application that we are submitting for our clients, such as our clients' family details, number of dependants;
 - credit information, including credit information contained in credit reports from credit reporting bodies that our clients authorise us to obtain on our clients' behalf;
 - information about the products and services our clients would like to obtain through us or that we provide or have provided to our clients;
 - records of our interactions with you, including by telephone, email and online
 - your enquiries or complaints

We may also collect and hold sensitive information about our clients, including information relating to:

- our clients' citizenship or country of birth
- criminal records
- information where our clients are a politically exposed person under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006;
- membership of professional or trade associations or unions; or
- Health Information.

We collect and hold Health Information where we offer products with an insurance component to our customers. We do not use or share that information for any purpose other than the underwriting or administration of a customer's policy, claim or account, or as otherwise disclosed to the client when the information was collected.

Additionally, in the course of our business we collect and hold personal information about: •contacts at our business partners and affiliates, including broker groups or brokers that operate under the TPH brand or insurers whose products we deal with. The kinds of information we collect include:

- business address and contact details, including telephone numbers and email addresses;

- where relevant, information about broking activities carried out by individual brokers, such as details of any loans or other products that have been originated by those brokers;
- job applicants or individuals who provide contracted services to UFS. This will include letters of application, details of work history and referees.
- persons who apply to utilise TPH as an origination of finance contracts UFS will collect information to consider whether to recommend or approve their application, including professional qualifications, work history, background checks and any other information we consider relevant to that assessment.

The purposes for which TPH collects, holds, uses and discloses personal information

TPH collects, holds, uses and discloses personal information about its clients in order to:

- provide them with finance broking and related services and products;
- assisting in applications for finance, guarantees or related insurance proposals;
- sourcing and arranging finance and insurance;
- maintaining our clients' contact details;
- to send you marketing about other products and services that we think may be of interest to you;

UFS also collects, holds, uses and discloses personal information about:

- contacts at its business partners and affiliates in order to manage and improve its relationships with those entities and joint activities that it carries out with them;
- individuals at broking groups or individual brokers in order to provide aggregation services to those individuals and to manage those services, including to determine remuneration payable to the individuals;
- job applicants and individual contractors to assess whether to engage them to provide services to TPH

How personal information is collected, used and disclosed

Whenever it is reasonable and practicable to do so, we collect personal information about our clients directly from our clients, or our clients' appointed agent. This includes that we collect personal information of:

- clients or persons applying to become TPH brokers in application forms and other documentation that they complete and provided to us, including forms that are completed online;
- job applicants and individual contractors, in application forms or letters received from them; or
- other persons through our website.

However, we may also disclose our clients' personal information to, and collect further personal information about our clients from:

- referrers who refer our clients' applications to us in order for us to contact our clients about providing services to our clients;
- third parties identified in our clients' application for finance or any related guarantee or related insurance proposal;
- third parties identified in applications for finance for a company of which our clients are a director or otherwise an interested party or any related guarantee or related insurance proposal;
- guarantors or proposed guarantors identified in our clients' application for finance;

- one or more of the credit providers we apply to in order to arrange finance on our clients' behalf;
- Credit Reporting Bodies, where our clients have authorised us to obtain credit reports on our clients' behalf;
- our clients' car or finance broker;

How we hold personal information

We use security procedures and modern technology to protect the personal information that we hold. Much of the information we hold is stored electronically on servers owned by TPH that are located in company premises or in secure data centres located in Australia. Access to and use of this information within TPH is appropriately limited to protect from misuse or unlawful disclosure of the information.

How you can access and seek correction of your personal information

You can contact us to request access to the personal information that we hold about you. Generally, we will give you access to your personal information. However, there may be exclusions that apply that permit us to not provide you with access in some circumstances. If access is denied, we will provide you with the reason why unless, having regard to the grounds for refusal, it would be unreasonable for us to do so. You may make a complaint about a refusal to the Office of the Australian Information Commissioner.

You can also contact us to request that we correct personal information that we hold about you.

Any request to access or correct information should be made to TPH Privacy Officer using the contact details set out below and will be dealt with in accordance with the Privacy Act.

Mark O'keeffe 0433 899 790 email mark@tphasutralia.com.au

Disclosing your information overseas

If you are a client and have been resident in New Zealand, we are likely to disclose your personal information to an overseas recipient located in New Zealand in order to obtain credit information about you from New Zealand sources.

Marketing

We may use and disclose your personal information to inform you about other products and services we think may be of interest to you in the future, and we may also disclose your personal information to UFS' related bodies corporate, third party affiliates or other partners (together referred to as "the Related Companies") so that they may use and disclose the information to inform you about their products and services, including for direct marketing by TPH or the Related Companies.

respect your right to ask us not to use your information for direct marketing and UFS and the Related Companies will not send you information about products and services if you so request by contacting UFS using the contact details set out below.

Complaints

If you have a complaint about the way we have dealt with your personal information or think that we have breached the Australian Privacy Principles, you may make a complaint by contacting our Privacy Officer at the contact details listed below.

We will respond to complaints within 30 days.

If your concern is not resolved to your satisfaction, you may refer your complaint to the Office of the Australian Information Commissioner by visiting www.oaic.gov.au, calling 1300 363 992 or by emailing enquiries@oaic.gov.au.

Cookies

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. Cookies are generally used on the TPH site to:

- access online services - if you visit the TPH website and log into our secure areas we will use cookies to enable us to authorise your access
- manage advertising - we use advertising companies to deliver our online advertising. When you see one of our ads on a third party website, cookies are sometimes used to collect information about what pages you visit and the type of software you are using
- traffic monitoring - we use tracking companies to gather information about how people are using the TPH site, this information includes time of visit, pages visited, and some system information about the type of computer you are using. We use this information to enhance the content and services offered on the site.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences).

If you disable the use of cookies on your web browser or remove or reject specific cookies from this website or linked sites then you may not be able to gain access to all of the content and facilities in this website.

Dealing with TPH

If you visit the TPH website to browse, read or download information, our system will log these movements. These web site logs are not personally identifiable and UFS makes no attempt to link them with the individuals who browse the site.

Your account information is password protected and we recommend you do not divulge your password to anyone. To further protect your personal information, your log-in time will automatically expire after a certain period of inactivity.

TPH cannot guarantee or accept responsibility for the privacy practices or the content of web sites to which we provide links.

Contact Us

If you have any questions regarding our privacy policy or handling of information, please contact our Privacy Officer at the details below:

The Privacy Officer of Trans Pacific Holdings (Aust) Pty Ltd of 55 Wyuna Avenue Freshwater NSW 2096 Ph 0433 899 790 Fax 02 8088 6394 email mark@tphasutrialia.com.au

TPH Credit Reporting Policy

Part IIIA of the Privacy Act regulates the handling of credit information by certain types of organisations, including credit reporting bodies and credit providers.

TPH is deemed to be a credit provider under the Privacy Act only while it acts as an agent for a credit provider in performing a task that is reasonably necessary in processing an application for credit made to that credit provider.

The only circumstance in which TPH acts as an agent of a credit provider is where TPH obtains and verifies certain identification information about clients on behalf of a credit provider for the purposes of the Anti-Money Laundering and Counter Terrorism Financing Act 2006.

This involves the collection of "Credit Information" for the purposes of the Privacy Act, however, limited to "identification information". We do not collect or hold any other Credit Information, Credit Eligibility Information or CP derived information in our capacity as a credit provider.

However, where our clients have authorised us, we may request on our clients' behalf to obtain our clients' Credit Reporting Information from Credit Reporting Bodies. These requests will be made in the capacity of an access seeker authorised by our clients and we will not be acting as a credit provider for the purposes of such requests.

How we collect Credit Information

Whenever it is reasonable and practicable to do so, we collect the identification information about our clients directly from our clients, or our clients' appointed agent.

The purposes for which we collect, hold, use and disclose Credit Information

The purpose for which we collect, hold, use and disclose our clients' identification information is to verify our clients' identity for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 in connection with our clients' application, as authorised agent of a credit provider.

How we hold Credit Information

We use security procedures and modern technology to protect the Credit Information that we hold, including Much of the information we hold is stored electronically on servers owned by TPH that are located in company premises or in secure data centres located in Australia. Access to and use of this information within UFS is appropriately limited to protect from misuse or unlawful disclosure of the information.

How you can seek access to your Credit Eligibility Information or correction of your Credit Information or Credit Eligibility Information

We do not hold Credit Eligibility Information about you in our capacity as a credit provider under the Privacy Act. However, you can contact us to request that we correct Credit Information that we hold about you. You can also seek access to personal information generally that we hold about you as set out in our Privacy Policy above.

Any request to access or correct information should be made to TPH Privacy Officer using the contact details set out in our Privacy Policy above and will be dealt with in accordance with the Privacy Act.

Complaints

If you believe that the privacy of your Credit Information has been compromised, or if you believe that we have breached Division 3 of Part IIIA of the Privacy Act or the Credit Reporting Code of Conduct (Credit Related Complaint) you may make a complaint by contacting our Privacy Officer at the contact details listed below. If you wish to make a Credit Related Complaint, you must specify the nature of the complaint.

If you make a Credit Related Complaint, we will:

- within 7 days after your complaint is made, give you a written notice that:
- acknowledges you making the complaint; and
- sets out how we will deal with the complaint; and
- investigate the complaint.

If we consider that it is necessary to consult a Credit Reporting Body or credit provider about the complaint, we will do so.

After investigating your complaint, we will, make a decision about the complaint and give you a written notice that:

- sets out the decision; and
 - states that, if you are not satisfied with the decision, you may;
 - access a recognised external dispute resolution scheme of which we are a member. As set out above, TPH is a member of the Credit Ombudsman Service Limited; or
 - make a complaint to the Office of the Australian Information Commissioner,
- within 30 days commencing on the day on which your complaint is made or where we agree to a longer period in writing.

Definitions

For the purposes of this Privacy Policy and Credit Reporting Policy:

Credit Reporting Information about an individual means Credit Information, or CRB Derived Information, about the individual.

Credit Eligibility Information about an individual means:

- Credit Reporting Information about the individual that was disclosed to a credit provider by a Credit Reporting Body; or
- CP Derived Information about the individual.

CP Derived Information means any personal information about you:

- that is derived from Credit Information or CRB Derived Information about you that was disclosed to a credit provider by a Credit Reporting Body; and
- that has any bearing on your credit worthiness; and
- that is used, has been used or could be used in establishing your eligibility for consumer credit.

Credit Reporting Body means an organisation or an agency prescribed under the Privacy Act that carries on a business or undertaking that involves collecting, holding, using or disclosing personal information about individuals for the purposes of, or for purposes including the purpose of, providing an entity with information about the credit worthiness of an individual.

- that is derived by Credit Reporting Body from Credit Information about an individual that is held by the Credit Reporting Body; and
- that has any bearing on that individual's credit worthiness; and
- that is used, has been used or could be used in establishing that individual's eligibility for consumer credit.

Credit Information about an individual is personal information that is:

- identification information about the individual;
- consumer credit liability information about the individual;
- repayment history information about the individual;
- a statement that an information request has been made about an individual by a credit provider, mortgage insurer or trade insurer;
- the type of consumer credit or commercial credit, and the amount of credit, sought in an application;
- that has been made by the individual to a credit provider; and

- in connection with which the provider has made an information request in relation to the individual;
- default information about the individual;
- payment information about the individual;
- new arrangement information about the individual;
- court proceedings information about the individual;
- personal insolvency information about the individual;
- publicly available information about the individual:
- that relates to the individual's activities in Australia or the external Territories and the individual's credit worthiness; and
- that is not court proceedings information about the individual or information about the individual that is entered or recorded on the National Personal Insolvency Index; or
- the opinion of a credit provider that the individual has committed, in circumstances specified by the provider, a serious credit infringement in relation to consumer credit provided by the provider to the individual.

Health Information means:

- information or an opinion about:
- the health or a disability (at any time) of an individual; or
- an individual's expressed wishes about the future provision of health services to him or her; or
- a health service provided, or to be provided, to an individual;

that is also personal information; or

- other personal information collected to provide, or in providing, a health service; or
- other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

Personal information is information or an opinion about 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,

and includes "sensitive information" (as defined in the Privacy Act).

