# Privacy policy of Tilmak Pty Ltd Trading As

## The Money Centre Melbourne City

ABN: 74054353954 Australian Credit Licence # 395052

#### General

This privacy policy sets out how The Money Centre Melbourne City complies with obligations under the Privacy Act 1988 (Privacy Act). In this privacy policy, 'personal information' and 'information' are used interchangeably and have the same meaning as defined by section 6 of the Privacy Act.

The Money Centre Melbourne City collects personal information to provide you with the products and services you request as well as information on other products and services offered by or through us.

The Money Centre Melbourne City will act to protect your personal information in accordance with the Australian Privacy Principles (APP) under the Privacy Act (which can be found at: http://www.oaic.gov.au/privacy/) and any applicable industry privacy code.

## Why we collect information

Any information you provide The Money Centre Melbourne City, either using the internet or by any other means, is only collected for purposes which are reasonably necessary for, or directly related to, one or more of The Money Centre Melbourne City business functions or activities. These purposes include:

- to provide customers with the products and services they request and to monitor, evaluate and provide products and services;
- to assist customers with queries, resolve customer complaints, or requests for access to information, or to manage any legal action involving The Money Centre Melbourne City;
- to manage customer relationships or accounts and perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring, staff training, collecting debts and market or customer satisfaction research);
- to provide information on products and services offered by The Money Centre Melbourne City, affiliated product and service providers, and external product and service providers for whom we act as agent (unless the customer has opted out);
- to comply with our legal obligations under acts like the National Consumer Credit Protection Act 2009, the Privacy Act, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, the Pawnbrokers and Second-hand Dealers Act 1994 (WA) or the equivalent pawnbroking and second-hand dealers act in your state or territory;

- to identify customers or to establish their tax status under any Australian or foreign legislation, regulation or treaty or pursuant to an agreement with any tax authority;
- to gather and aggregate information for statistical, prudential, actuarial and research purposes;
- to develop and implement measures to detect or prevent fraud and credit loss; and
- to assist us with marketing and promotional purposes including the disclosure of personal information to third-parties, contractors or organisations who assist us in marketing and promotion of our products and services.

In addition, as required by Part IIIA of the Privacy Act, we may obtain your consent to collect, use and disclose information about you.

If you choose not to provide information which we require for the above purposes, we may be unable to provide you with the goods and services you request from us.

#### What we collect

Personal information collected by The Money Centre Melbourne City generally comprises name, address, date of birth, gender, marital status, occupation, account details, contact details (including telephone, facsimile and e-mail) and financial information. Sometimes we collect a few personal details unlikely to be known to other people to help us identify you over the telephone.

If you are applying for credit we may also collect the number and ages of your dependants, the length of time at your current address, your employer's name and contact details, the length of your employment, proof of earnings and, if you have changed employer in the last few years, details of your previous employment.

#### Disclosure

The Money Centre Melbourne City will not give your information to Government agencies, private sector organisations or anyone else unless one of the following applies:

- you have consented;
- you would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies;
- it is otherwise required or authorised by law;
- by your actions we consider you to have released us from our duty of confidentiality or to have consented to the disclosure of information about you without actually saying so (for example, if you discuss your financial position publicly with the media);
- it will prevent or lessen a serious and imminent threat to somebody's life or health; or
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

• it is reasonably necessary for the prevention or to help identify and/or investigate any actual or suspected fraud, unlawful activity or misconduct.

Depending on the product or service The Money Centre Melbourne City has provided you with, we may disclose information to:

- affiliated product and service providers and external product and service providers for whom we act as agent (so that they may provide you with the product or service you seek or in which you have expressed an interest);
- auditors we appoint to ensure the integrity of our operations;
- any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- your employer(s), referee(s), guarantor(s) or potential guarantor(s);
- if required or authorised to do so, regulatory bodies, government agencies or courts or anyone authorised by any one of them to receive such information;
- participants in the payments system (including payment organisations and merchants) and other financial institutions (such as banks);
- insurers;
- any joint borrower(s) or account holder(s);
- credit reporting bodies or debt collection agencies;
- other financial institutions and organisations at their request if you seek credit from them (so that they may assess whether to offer you credit);
- other parties where you have consented to the disclosure;
- suppliers from whom we order goods or services on your behalf (so that the goods or services may be provided to you); or
- other organisations or individuals specified elsewhere in this policy.

## **Identity Verification and Credit checks**

The Money Centre Melbourne City is required by law to conduct identity verification and credit checks under legislation such as the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (identity verification) and the National Consumer Credit Protection Act 2009 (identity verification and credit checks).

Information you give us when you fill out an application online, including your name, date of birth, residential address and other personal or sensitive information may be used to verify your details and to:

• conduct a credit check with a credit reporting body or any other credit provider with whom you have had dealings, including via e-verification;

- conduct a Politically Exposed Person or identity verification check with a credit reporting body, including via e-verification; and
- for such a credit reporting body or other credit provider to prepare and provide any assessment, report or result from those checks to us.

At the time of your application, we will specifically seek your consent for these verifications and checks to be conducted. If there is a partial or no match, you will have an opportunity to submit further documentation in support of your application to enable us to conduct further checks and properly verify your identity.

Where you have given us consent and provided your login and account information, we may access and collect your financial records from your financial institutions on your behalf via an online portal. This service is provided to remove the need for you to provide the physical financial statements we need to assess applications and comply with our obligations under the National Consumer Credit Protection Act 2009.

Please note that if you fail to meet a payment obligation in relation to credit we have provided to you or commit a serious credit infringement, we may disclose this to a credit reporting body.

You may request a credit reporting agency not to use your credit reporting body information for the purposes of pre-screening of direct marketing by a credit provider or where you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

You have a right to request a copy of your credit reporting information from credit reporting bodies: once a year; or if it relates to our refusal to provide you with credit; or you wish to correct information held on you.

We may disclose information to the following credit reporting body:

#### Equifax Pty Ltd., a wholly owned subsidiary of Equifax Inc.

Equifax's Privacy Policy: <a href="http://www.equifax.com.au/privacy">http://www.equifax.com.au/privacy</a>
Address: Equifax - Public Access,
Equifax Australia Information Services and Solutions Pty Limited,
PO Box 964,
NORTH SYDNEY, NSW 2059

#### Website data

If you visit the Money Centre Melbourne City website to read, browse or download information, our system may record the following information which is provided by your browser:

- the date and time of your visit;
- the type of browser and operating system you are using;

- your Internet Service Provider and top level domain name (for example .com, .gov, .au, .uk etc);
- the address of any referring web site (for example the previous web site you visited); and
- your computer's IP (Internet Protocol) address (a number which is unique to the machine through which you are connected to the internet).

Website data is kept strictly confidential. It is used for internal research purposes only. It helps us monitor which sections of the site are most popular to give us a clear idea of what type of information and services to include on our site. It also informs us which members and subscribers are using the site so that we can customise the website information and presentation.

When you use our web site, we may send you a "cookie" that gives you a unique identification number. A "cookie" is a packet of information that allows the server (the computer that houses the website) to identify and interact more effectively with your computer. A different identification number is sent each time you use one of our websites. These cookies may be Session cookies which only last until you close your browser, or they may be Persistent cookies which are stored longer term on your computer. Cookies do not identify individual users, although they may identify a user's browser type and your Internet Service Provider (ISP).

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our websites or certain website functions may not work properly or at all.

#### **Online forms**

If you decide to complete an online application form, we will collect the information that you enter into the online form and the IP address of your computer. If you cancel your application prior to submission, any information entered on the current screen which has not yet been submitted, will be automatically deleted. Information you have already submitted to us prior to you cancelling your application may be used to contact you about your application, after which it will be automatically deleted. The deletion referred to above will happen within a reasonable period of time but in any event, no longer than 30 business days.

#### Links to other websites

Our websites may contain links to non-The Money Centre Melbourne City websites. While such links are provided for your convenience, you should be aware that the information handling practices of the linked websites might not be the same as ours and we encourage you to read and understand the privacy policies on these websites prior to providing any information to them.

We may disclose the information collected, in an aggregated form only, to third parties including advertisers or potential advertisers.

## **Telephone and Email**

We may monitor and record telephone calls for training and security purposes.

We will preserve the content of any email that you send us if we are legally required to do so. Where appropriate, we may record your email address against the relevant company name on our confidential customer database.

Your email address is used only to send you information that you have requested and as necessary to complete a transaction or application or for marketing and promotional purposes. As part of your use of our email marketing software, The Money Centre Melbourne City allows you to elect to receive, or not to receive, certain information.

The Money Centre Melbourne City will not send you unsolicited email information relating to marketing and promotional purposes where you have opted out of receiving such communication. The Money Centre Melbourne City will not sell, rent or lend our contact lists or our customers' contact lists (including customer data) to third parties.

## **Security of Information**

The Money Centre Melbourne City takes all reasonable care to preserve the security of personal information collected or submitted to us digitally.

The Money Centre Melbourne City regularly reviews developments in security and encryption technologies. As no data transmission over the Internet can be guaranteed as totally secure, The Money Centre Melbourne City cannot guarantee the security of any information you transmit to us or which is generated from our online products or services and you engage with us at your own risk.

Upon receiving your transmission, we ensure that reasonable steps are taken to preserve the security of the information in our customer database.

#### Contact us

If you have any questions or would like further information about our privacy and credit information handling practices and policies, or a hard copy of this policy, or you wish to exercise your right to make a correction, complaint or request access to, or deletion of, any information which we have collected about you, please contact our Privacy Officer at:

The Privacy Officer
The Money Centre Melbourne City

Email: <a href="mailto:cashloans@themoneycentre.com.au">cashloans@themoneycentre.com.au</a>

Our Privacy Officer will attend to your matter within a reasonable period after your communication is received and if access to information has been requested, will give access to

the information in the manner requested by you, for a reasonable fee where it is reasonable and practical to do so.

## **Acceptance and Changes to Privacy Policy**

You acknowledge and accept that your use of The Money Centre Melbourne City website or of products which direct you to this Privacy Policy indicates your acceptance of the use and disclosure of information provided for under this Privacy Policy.

This is the current Privacy Policy. It replaces any other Privacy Policy for the Money Centre Melbourne City website previously published on the Money Centre Melbourne City website. The Money Centre Melbourne City may at any time vary the Privacy Policy by publishing the varied Privacy Policy on the Money Centre Melbourne City website. You accept that by doing this, The Money Centre Melbourne City has provided you with sufficient notice of the variation.