

PRIVACY POLICY

NMFG Pty Ltd trading as Needy Money

ACN 113 877 884

Australian Credit Licence 392616

1. Personal Information and its importance

Personal information is information or an opinion about you from which your identity is apparent. Protecting your privacy is fundamental to the way we do business. This document sets out the way we will collect, store, use and share your personal information. It will also provide you with information about what you can do to access the personal information we have about you, the way you can have it corrected, if necessary, and what steps you can take to complain about any action taken by us in relation to the information.

The legal framework under which we deal with your personal information is set out in the Privacy Act, the 13 Australian Privacy Principles (contained in Schedule 1 to the Privacy Act) and the Credit Reporting Privacy Code made under the Privacy Act. These rules apply to information about individuals, not corporations.

2. Why we collect personal information

We collect personal information so that we can:-

- a. accept and process your application for a loan in accordance with the requirements by law;
- b. assess your personal and/or commercial creditworthiness;
- c. make a determination about the risk of you defaulting on your obligations to us;
- d. undertake, where appropriate, risk assessment and management involving securitisation, credit scoring, portfolio analysis, reporting and fraud prevention and claim recovery;
- e. if your application is successful, provide you with a loan and determine on what terms we will do so, or make the appropriate recommendation to you about the availability of a loan;
- f. manage your account with us;
- g. assist in the resolution of any dispute you have with us;
- h. provide you with information about other products or services we currently offer, or may offer in the future or are offered by our commercial partners;
- i. in certain circumstances as disclosed in paragraph 6(l), sell your personal information, or to provide that information to others who might offer services to you, and
- j. satisfy an obligation we may have under the law to collect personal information or make assessments.

We will not use personal information we have collected for a purpose other than that disclosed in this Privacy Policy without your consent, or in circumstances where you would reasonably expect the use for that purpose.

3. If you do not provide us with your personal information

If you do not provide us with your personal information or give us consent to collect it from others, we will be unable to, amongst other things, process your application and make the assessment that we are required to by law. We will therefore not be able to satisfy our internal and external obligations and will not be able to give you a loan or provide a service to you.

4. Where we get personal information

We obtain personal information from any of the following sources:-

- a. you in the process of your loan application or in other communication with you;
- b. publicly available information such as telephone directories, information on websites or from publicly accessible databases;
- c. other credit providers from whom we request information;
- d. credit reporting bodies;
- e. persons or entities you have authorised to provide us with information;
- f. your use of our website with the aid of "cookies", and
- g. marketing or lead generation companies from which we may acquire information in order that we may offer services to you.

Where we obtain personal information which we are either required to collect, or authorised to collect by law, we will advise you of that fact.

5. Sensitive information

"Sensitive information" is information about your 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 or genetic information.

We will not collect, use or disclose any sensitive information about you unless we have your specific consent, and it is necessary to undertake one of the functions referred to above.

6. Exchange of personal information

We may disclose your personal information to:-

- a. such credit reporting bodies, ratings agencies and any business which provide information about the credit worthiness of persons with whom we have a commercial arrangement (more detail about this appears below);
- b. other credit providers;

- c. personal and/or business referees nominated by you, including your employer (in relation to your employment status and income);
- d. our professional advisers, contractors and other service providers (eg. IT consultants);
- e. your legal, financial and other advisers (if any) if permitted by you;
- f. Centrelink, Australian Taxation Office or other Government departments, agencies or bodies, to whom we may be required by law to disclose information supplied by you to us;
- g. our financiers;
- h. our contractors, agents and service providers (including debt collectors) in order that we may deal with you more efficiently or collect monies owing to us;
- i. our ASIC and OAIC approved external dispute resolution service;
- j. payment system operators (if any);
- k. our insurers, insurance underwriters/providers in relation to our insurance policies;
- l. entities who may purchase (or who may be interested in purchasing) any interest in the obligations you may owe us under the credit contract, and entities (either credit licensees (credit providers or credit assistance providers) or lead providers) to whom we may sell your personal information for a fee. The credit licensees or lead providers may either provide a service to you themselves or on-sell your personal information to others on the same basis as your personal information is sold to them;
- m. search agents and search system providers in relation to your residential information and other information in order to contact you, and
- n. real estate agents, employers and others to enable us to be advised of your current employment, residential and other information held by them.

7. Overseas disclosure

We do not intend to disclose your personal information overseas and cannot foresee any circumstance in which the need to do so might arise. We do acknowledge, however, that as part of our backup system, some of your information might be stored overseas (for example if we use "cloud storage"), but the information will not be available to be accessed by any person overseas.

8. Credit reporting

The Privacy Act allows credit providers to disclose some information to credit reporting bodies. The information which is disclosed depends on the level at which we participate in the credit reporting system. The credit reporting bodies are also bound by the Privacy Act and are restricted in the uses to which that information may be put. Each of the credit reporting bodies must have a policy, similar to this one, to explain how it uses your information.

The information we may disclose to a credit reporting body is the following:-

- a. whether we provide you with a loan;
- b. the type of loan provided;
- c. the amount of the loan provided;
- d. the date the loan was supplied;
- e. the date the loan terminated;
- f. the terms of the loan;
- g. whether payments are made on the loan;
- h. if you default in making a payment on the loan (where the amount is \$150 or more and has been outstanding for 60 days or more);
- i. whether you were late in making payments and whether you make those payments up, and
- j. if you commit a serious credit infringement (fraudulent activity or deliberately evading your obligations under the loan terms).

There are three credit reporting bodies with whom we might deal. They are:-

- a. Equifax(formerly Veda Advantage)
 Tel: 13 8332 (Mon – Fri, 8:30am – 6:00pm EST)
 Email: Electronic message at <https://www.equifax.com.au/contact>
 Web: <https://www.equifax.com.au> or www.mycreditfile.com.au.
 Mail: PO Box 964
 North Sydney NSW 2059

- b. Dun & Bradstreet (Australia) Pty Ltd
 Tel: 1300 734806 (Mon – Fri, 8:30am – 5:30pm EST)
 Email: pac.austral@dnb.com.au
 Web: www.checkyourcredit.com.au
 Mail: PO Box 7083
 Sydney NSW 2001

- c. Experian Australia Credit Services Pty Ltd
 Tel: 1300 783 684
 Email: creditreport@au.experian.com
 Web: <http://www.experian.com.au/credit-services/credit-services.html>
 Mail: GPO Box 1969
 North Sydney NSW 2060

9. Access and correction

a. Access

The Privacy Act provides that, subject to some exceptions, you have a right to know what information we hold about you including information we have obtained from a credit reporting bodies. If you wish to access the personal information we hold about you, including information we have obtained from

a credit reporting body, you should make contact with us in any of the following ways:-

Tel: 03 9468 8200

Email: bundoor@needy.com.au

Mail: Level 1, Suite 1
39 Plenty Road
Bundoor VIC 3083

It may be necessary for us to verify your identity before we can provide any information.

We will usually be able to provide this information to you within 30 days of the request. Should we require longer, we will write to you advising you a reason and seeking additional time. We may require you to pay our reasonable costs of providing this information to you. There are restrictions in relation to those costs contained in the law.

If possible, we will provide you with the personal information in the form you request. However, in some circumstances it may be necessary for you to access that information in a method determined by us, but we will always make it as easy as possible for you to access that information.

There may be occasions where we cannot provide you with that information. In such a case we will write to you and give you our reasons.

b. Correction

You can request that any personal information we hold be corrected if it is inaccurate, incomplete or out of date. If you wish to make such a request you should contact us by any of the methods set out above.

If your request relates to information that we have received from a credit reporting body, we will contact the credit reporting body and advise them of your request.

If we agree with you that your information is inaccurate, incomplete or out of date we will make the appropriate changes and will write to you and tell you the changes we have made within seven days of making that change.

If we do not agree that the information is inaccurate, incomplete or out of date, we will write to you giving you the reasons why we have formed the opinion and tell you what steps you can take as a result of our refusal to change the information.

10. Complaints

You are entitled to complain if you believe we have not dealt with your personal information in accordance with the provisions of the Privacy Act (including the 13 Australian Privacy Principles) or any code under the Privacy Act (including the Privacy (Credit Reporting) Code).

If you wish to make a complaint, you should first contact us telling us what the complaint is and we will do our best to resolve the complaint with you.

If we believe that we cannot resolve the complaint within 30 days, we will write to you telling you why and seeking further time.

If you are not satisfied with the resolution of the complaint, you have a right to refer the complaint to our external dispute resolution service, the Credit and Investments Ombudsman ("CIO") or to the office of the Australian Information Commissioner ("OAIC").

The contact details of those two bodies are as follows:-

Credit and Investments Ombudsman ("CIO")

If lodged before 1 November 2018

Phone 1800 138 422 (9:00am to 5:00pm Sydney time)

Fax 02 9273 8440

Mail PO Box A252, South Sydney NSW 1235 or
Reply Paid 252, South Sydney NSW 1235

E-Mail info@cio.org.au

Website www.cio.org.au

Complaint page: <http://www.cio.org.au/complaint-resolution/making-a-complaint/>

Australian Financial Complaints Authority (AFCA)

If lodged on or after 1 November 2018

Australian Financial Complaints Authority

GPO Box 3, Melbourne VIC 3001

Tel: 1800 931 678 (free call)

Email: info@afca.org.au

Web: www.afca.org.au

Office of the Australian Information Commissioner ("OAIC")

Phone 1300 363 992 (9:00am to 5:00pm Sydney time)

Fax 02 9284 9666

Mail GPO Box 5218, Sydney NSW 2001

E-Mail enquiries@oaic.gov.au

Website www.oaic.gov.au

Complaint form: <https://forms.business.gov.au/aba/oaic/privacy-complaint/>

We have a written policy ("Dispute Resolution Policy") in place under which we deal with any complaint made under the provisions of the National Consumer Credit Protection Act. We are required to have that policy as part of our Australian Credit Licence. We can provide you with a copy of that policy on request.

We will manage your complaint, so far as we are able, under the Dispute Resolution Policy. There will, of course, need to be some changes as a result of the type of complaint being made.