

1 **Who are we?**

'We', 'us' and 'our' refer to Vision Property & Finance ABN 50 867 155 934, Australian Credit Licence 389961 and our related businesses. Our offices are at:

Suite 603, 99 York Street
Sydney 2000
Sydney, Australia

Phone: 02 8354 3000
Email: loans@visionpf.com.au

2 **Introduction**

We know that how we collect, use, exchange and protect your information is important to you, and we value your trust. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. Our commitment in respect of personal information is to not only protect and assure you but also to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law. Important changes were made to these laws that came into effect on 14 March 2014.

[CLICK HERE](#) to read about these changes.

3 **Information we collect**

When we refer to **personal information** we mean information from which your identity is reasonably apparent.

3.1 **Information we collect from you**

We collect information about you and your interactions with us, for example, when you request a home loan assessment, when you phone us, send us information (eg, via fax, post or email), when you use our website or mobile applications. The information we collect from you may include:

- Your identity and date of birth
- Your contact details
- Your financial details (for example, your income, expenses, assets and liabilities and credit history, etc)



- Other personal details such as your gender, marital status, number of dependents and even health information (for example for insurance purposes)
- Your financial objectives

3.2 Information we collect from others

Where reasonable and practical, we will collect your personal information directly from you. Occasionally, however, we will collect information about you from others, such as service providers, existing lenders, agents, advisers, employers, accountants, solicitors or family members. For example, if you apply for credit, we may need to obtain a credit report from a credit reporting body.

3.3 Sensitive information

The Privacy Act also protects your sensitive information, such as health information that is collected on insurance or hardship applications. If we need to obtain this type of information, we will ask for your consent.

4 How and why we use your information

We collect, use, hold and exchange your personal information so that we can:

- Establish your identity
- Assess your current or future requirements for credit, provide you with credit advice, make credit recommendations, manage credit applications with lending institutions we recommend to you, and manage the credit process through to a successful conclusion
- Manage our relationship with you after the settlement of your loan and answer any future questions you may have about the service we have provided to you
- Conduct and improve our business to improve the experience that customers have with us
- Meet our internal administrative, marketing, planning and research requirements
- Communicate information to you about the finance industry with a view to trying to keep you well informed of the marketplace
- Communicate any updates or changes to the products and services that we provide
- Provide relevant information to associated financial planners so that they can make recommendations to you in respect of risk insurance products, such as insurance for

life, permanent disability, income protection and critical illness cover, investment products and services, superannuation, including self-managed super funds

- Meet our legal and regulatory reporting obligations (including, but not limited the administration of our Australian Credit Licence #389961)

5 Who we exchange your information with

We use your information for the purposes set out in Point 4 above. We do not sell, trade, or rent your personal information to others.

Where possible, we will inform you, at or before the time of collecting your personal information, of the types of organisations to which we intend to disclose your personal information. We may disclose your personal information to our related bodies corporate, credit representatives, financial advisers, panel of approved lenders, or financial product suppliers and advisers, service providers and agents that we use in the ordinary operation of our business.

We will only disclose your personal information only for the purposes outlined in Point 4. Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, and
- (b) you have consented to us making the disclosure.

5.1 Disclosing parties include:

We may disclose your personal information with:

- to prospective funders or other intermediaries in relation to your finance requirements (for example mortgage insurers);
- to other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as other finance brokers, lawyers and accountants;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Counter Terrorism Financing Act 2006 (Cth)*;

- to investors, agents or advisers, or any entity that has an interest in our business;
- organisations that provide products or services used or marketed by us;
- to your employer, referees or identity verification services; or
- Those to whom we outsource certain functions, for example, data entry

5.2 Disclosure to overseas recipients

Some of the recipients to whom we disclose your personal information may disclose this personal information to recipients that are based overseas. One such firm we use from time to time is XSource Holdings Pty Limited (**xSource**), a reputable Australian firm engaged by many Australian finance brokers. xSource assists us with data entry and back office processing services. Although XSource Holdings Pty Limited is an Australian company it has outlined to Vision that it may disclose personal information to overseas recipients. xSource advised that these recipients will be employed in its overseas branch offices or subsidiaries. Here is a copy of xSource's privacy policy. [CLICK HERE](#)

6 *How we store your information*


By law, we are required to hold certain information about you, even after you are no longer a Vision customer. We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or exposure by:

- Installing security and access requirements for our IT systems, such as passwords, firewalls and virus scanning software
- Maintaining document storage and destruction policies
- Providing your personal information to you only when we are satisfied as to your identity

We mainly store your information in electronic form. Even if you supply us with paper based information, we will convert those documents to electronic form and either return the paper copies to you, or use our document destruction facilities.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia. We will make every effort to ensure that these servers are hosted by internationally recognised reputable organisations.

We require all staff and credit representatives to maintain the confidentiality of customer information. Access to personal information is restricted to employees whose job responsibilities require access to information.



7 Access to and correction of your personal information

7.1 Access to personal information

Subject to the exceptions outlined below, under Australian Privacy Law we must allow you to access the personal information we hold. To access this personal information please use the contact details specified below. We will respond to you within seven days of receiving your request. We may need to contact third parties to properly investigate your request. We will provide you with the outcome of your request within thirty days. We may charge a fee for our costs in retrieving and supplying the information to you.

As mentioned above, there may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

7.2 Corrections to your personal information

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information at the time of the request otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

We may need to consult with other entities as part of our investigation.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

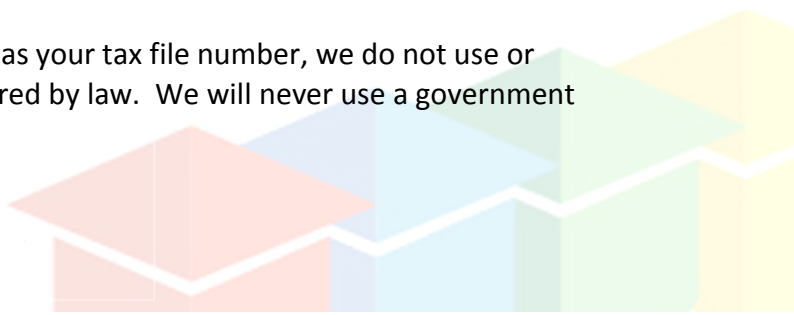
8 Direct marketing

From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting us at the numbers and address outlined in this document. If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

9 Government identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.



We make every effort that, if you send information to us with your Tax File Number on it, we will delete it prior to sending it to any Disclosing Party. We would ask for your assistance in this regard by requesting that you delete your Tax File Numbers from any document prior to sending it to us.

10 Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

11 Contacting us and providing feedback

If you are not satisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our Privacy Officer. We will acknowledge your complaint within seven days of receipt. And we will provide you with a decision on your complaint within thirty days of receipt.

You can make any requests relating to your personal information held by us or any complaints regarding treatment of your privacy by contacting:

The Privacy Officer
Vision
Suite 603, 99 York Street
Sydney 2000

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted via the Office of the Australian Information Commissioner website (www.oaic.gov.au) or on 1300 363 992.

12 Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy policy from time to time or as the need arises.

You may request this privacy policy in an alternative form.

This Privacy Policy was amended on 19 March 2015.

