

**CREDIT CLEAR PTY LTD
PRIVACY POLICY**

1 PURPOSE OF OUR POLICY

- 1.1 Credit Clear Pty Ltd ABN 48 604 797 033 (which, for the purpose of this Privacy Policy includes any of its Related Bodies Corporate, as that term is defined in the *Corporations Act 2001 (Cth)*) (**we, us or our**) has developed this Privacy Policy to inform individuals about how we manage the Personal Information that we collect about individuals that is necessary and incidental to:
- (a) providing the system and services that we offer, primarily the Credit Clear platform (**Credit Clear**); and
 - (b) the normal day-to-day operations of our business.
- 1.2 This Privacy Policy follows the standards of the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988 (Cth)* (**Privacy Act**).
- 1.3 By providing personal information to us, each individual is taken to have read, and consented to the collection, use disclosure and handling of their personal information in accordance with this Privacy Policy.

2 WHO AND WHAT THIS POLICY APPLIES TO

- 2.1 This Privacy Policy deals with how we handle “personal information” as that term is defined in the Privacy Act and includes information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable (**Personal Information**).
- 2.2 We handle Personal Information in our own right and also for and on behalf of our customers and users.
- 2.3 Our Privacy Policy does not apply to information we collect about businesses or companies, however it does apply to Personal Information that we collect about the people in those businesses or companies.

3 THE INFORMATION WE COLLECT AND WHY IT IS COLLECTED

- 3.1 In the course of business it is necessary for us to collect Personal Information. We aim to collect personal information only if it is reasonably necessary to providing the service, product or information that an individual has requested from us.
- 3.2 The types of Personal Information we may collect includes:
- (a) **Personal Details.** details such as an individual’s name, location, date of birth, physical location, language, family details and other Personal Information that allows us to identify the individual;
 - (b) **Contact Information.** information such as an individual’s email address, telephone & fax number, third-party usernames, residential, business and postal address and other information that allows us to contact the individual;
 - (c) **Financial Information.** financial information related to an individual such as any debts owed to our customers, bank or credit card details used to transact with us and other information that allows us to transact with the individual and/or provide them with our services;
 - (d) **Statistical Information.** information about an individual’s online and offline preferences, habits, movements, trends, decisions, associations, memberships, finances, purchases and other information for statistical purposes; and

- (e) **Information an individual sends us.** personal correspondence that an individual sends us, or that is sent to us by others about the individual's activities.

3.3 We may also collect other Personal Information about an individual if it is necessary to manage our relationship with them, which we will maintain in accordance with this Privacy Policy.

3.4 We may also collect information that is not Personal Information about an individual such as information regarding their computer, network and browser. This may include their IP address. Where information that is not Personal Information is collected the APPs and this Privacy Policy do not apply.

4 HOW INFORMATION IS COLLECTED

4.1 In the course of providing our products and services (including the Credit Clear platform), we collect Personal Information in a variety of ways. Unless it is unreasonable or impracticable to do so, we collect personal information from individuals directly including by using cookies on our website.

4.2 In some cases however, we will collect information about individuals from a third party.

4.3 Most Personal Information will be collected in association with our customers using Credit Clear to manage their relationship with individuals, and as a result information may be collected from an individual's use of Credit Clear, an enquiry about Credit Clear or generally dealing with us. However we may also receive Personal Information from sources such as advertising, information that is in the public domain (including online and information that an individual posts online (including social media content)), public records, mailing lists, contractors, staff, recruitment agencies and our business partners. In particular, Personal Information is likely to be collected as follows:

- (a) **Using Credit Clear.** When an individual enters Personal Information into Credit Clear for any reason.
- (b) **Registrations/Subscriptions.** When an individual registers or subscribes for a service, list, account, connection or other process whereby they enter Personal Information details in order to receive or access something, including a transaction;
- (c) **Contact.** When an individual contacts us in any way, including to make an enquiry about our services, or to engage with our business or its employees in the course of receiving services from us;
- (d) **Access.** In some cases you may be required to validate your identity in order to use Credit Clear. When an individual accesses us through the internet we may also collect information using cookies (an individual can adjust their browser's setting to accept or reject cookies) or analytical services; and/or
- (e) **Pixel Tags.** Pixel tags enable us to send email messages in a format customers can read and they tell us whether mail has been opened.

4.4 As there are many circumstances in which we may collect Personal Information both electronically and physically, we will endeavour to ensure that an individual is aware of when their Personal Information is being collected. At the time of collection, or as soon as practicable after we have collected it, we will take such steps as are reasonable in the circumstances to notify an individual of the collection and of matters relevant to the collection, unless it is obvious from the circumstances that the individual would know or would expect us to have the information.

5 WHEN PERSONAL INFORMATION IS USED & DISCLOSED

5.1 We collect, hold, use and disclose Personal Information primarily to:

- (a) provide products or services to our customers;
- (b) enable individuals to manage their affairs with our customers; and
- (c) contact individuals for business purposes and manage our relationship with individuals, your organisation or our customer.

5.2 Personal Information is also collected, held, used and disclosed to enable us to operate our business. This may include the following purposes:

- (a) enabling the individual to manage its affairs with our customer;
- (b) the provision of goods and services between an individual and us;
- (c) verifying an individual's identity;
- (d) communicating with an individual about:
 - (i) their relationship with us;
 - (ii) our goods and services;
 - (iii) our own marketing and promotions to customers and prospects;
 - (iv) competitions, surveys and questionnaires;
 - (v) investigating any complaints about or made by an individual, or if we have reason to suspect that an individual is in breach of any of our terms and conditions or that an individual is or has been otherwise engaged in any unlawful activity; and/or
 - (vi) as required or permitted by any law (including the Privacy Act);
- (e) assisting individuals with enquiries or complaints; and
- (f) developing and improve our products, client service and relationships.

5.3 We may disclose an individual's Personal Information to:

- (a) external providers of services that we use to provide business or administrative services to our business or manage our business systems (for example, file storage service providers, database and mailing service providers, marketing service providers, providers of payment processing and identity verification services and IT technicians who may need access when providing on-site support (although it is our practice for them to work under supervision) and other professional service providers as required from time to time); or
- (b) our professional advisors and agents.

5.4 If an individual is a debtor of one of our customers, that individual's Personal Information will also be disclosed to the relevant customer. Where Personal Information is provided to us by a third party (such as our customer) that third party will always have access this information as the master record holder.

5.5 We may disclose an individual's Personal Information to these third parties so that they can assist us with providing the best possible service to our customers.

5.6 Those people or companies will be permitted to access only the Personal Information they need to deliver the service to us, you, or our customers, or where required by law or our

reporting requirements. We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

- 5.7 If we sell or otherwise transfer part or the whole of our company or our business (or part of our business) to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your Personal Information that is collected by us may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the business.
- 5.8 We may utilise third party service providers to communicate with an individual and to store contact details about an individual, which may result in Personal Information being in transit or disclosed outside of Australia. Such service providers may be located in the United States, New Zealand or Singapore.
- 5.9 Generally speaking, the Personal Information that we collect and hold about you will be stored as follows:

Country in which the individual is located	Country in which Personal Information is stored
Australia and New Zealand	Australia
South East Asia	Singapore

- 5.10 Except as set out in numbered paragraph 5.8 or 5.9, unless we have consent, or the disclosure is required or authorised by law, we will not disclose an individual's Personal Information to any entity outside of Australia that is in a jurisdiction that does not have a similar regime to the APPs or an implemented and enforceable privacy policy similar to this Privacy Policy. We will take reasonable steps to ensure that any disclosure to an entity outside of Australia will not be made until that entity has agreed in writing with us to safeguard Personal Information as we do.
- 5.11 When an individual provides us with their Personal Information, they give us their consent to disclose their personal information outside of Australia for the purposes described above and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with the Privacy Act.
- 5.12 We will not otherwise disclose information about individuals unless the disclosure:
- (a) is required or authorised by law; or
 - (b) that individual have consented to our disclosing the information about them.

6 SECURITY OF PERSONAL INFORMATION

- 6.1 We will take all reasonable steps to protect an individual's Personal Information from unauthorised access, modification or disclosure and from misuse, interference and loss. This includes appropriately securing our physical facilities and electronic networks.
- 6.2 Credit Clear uses encryption to transfer Personal Information. Despite this, the security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. Each individual that provides information to us via the internet or by post does so at their own risk.
- 6.3 We are not responsible for the privacy or security practices of any third party (including third parties to whom we disclose personal information, including our customers). The collection, use and disclosure of an individual's Personal Information by such third parties is subject to their own privacy and security policies.

6.4 If an individual suspects any misuse or loss of, or unauthorised access to, their Personal Information, they should let us know immediately.

7 We will retain the Personal Information that we collect as required by law, and then take reasonable steps to destroy or permanently de-identify that Personal Information if it is no longer needed.

8 HOW TO ACCESS AND/OR UPDATE INFORMATION

8.1 Subject to the APPs and other exceptions required by law, an individual has the right to request access to, or correction of, the Personal Information that we hold about them. We will respond to a written request within a reasonable period of receiving their written request (subject to appropriate verification of the individual's identity).

8.2 We aim to ensure that the Personal Information we collect and hold is accurate, complete and up to date. It is an individual's responsibility to provide us with accurate and truthful Personal Information, and properly update the information with us. We cannot be liable for any information that is provided to us that is incorrect. If an individual believes that the Personal Information we hold is inaccurate or incomplete, they need to contact us and we will use all reasonable efforts to correct the information. If we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the Personal Information claiming that you believe the information is inaccurate, incomplete or out of date.

8.3 We will give each individual access to, or correct, their Personal Information unless there is a lawful reason for refusing the request for access or correction. If we refuse a request we will give the individual; a written notice explaining our reasons for that refusal and how they may complain about that refusal.

8.4 We may charge an individual a reasonable fee for our costs incurred in meeting any of their requests to disclose the Personal Information we hold about them.

9 COMPLAINTS AND DISPUTES

9.1 If an individual has a complaint about our handling of their Personal Information, they should address their complaint in writing to the details below. Complaints should set out the details of the complaint and contact details of the individual making the complaint.

9.2 Our Privacy Officer will review complaints, acknowledge requests and ask for any other applicable information. Our Privacy Officer will then investigate the issue and advise the complaint in writing of the outcome.

9.3 If we have a dispute regarding an individual's Personal Information, we both must first attempt to resolve the issue directly between us. If the issue is not resolved, the individual can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at www.oaic.gov.au.

10 CONTACTING US

10.1 All correspondence with regards to privacy should be addressed to:

Attn: Privacy Officer
Credit Clear Pty Ltd
Level 4, 6 Riverside Quay
Southbank VIC 3006
Australia
Email: info@creditclear.com.au

11 AMENDMENTS TO THIS POLICY

- 11.1 We reserve the right to make changes to this Privacy Policy. We will post the changes on our webpage at <http://www.creditclear.com.au/privacy>. Please refer back to this Privacy Policy to review any amendments.
- 11.2 We may do things in addition to what is stated in this Privacy Policy to comply with the APPs, and nothing in this Privacy Policy shall deem us to have not complied with the APPs.