

Privacy Policy (“Policy”)

This Policy was last updated on 28th February 2017.

ProAMS Services Pty Ltd ACN 608 317 700, Hardy Advisory Pty Ltd ACN 165 215 823 and Geoff Hardy Advisory Pty Ltd ACN 607 690 228 (“we”, “our” or “us”) are committed to protecting the personal and credit related personal information (“**credit information**”) that we may collect and hold about you. This Policy sets out our policies relating to management of your personal information and credit information. These policies are based on the requirements of the *Privacy Act 1988* (Cth) (“**Act**”) (including Australian Privacy Principles (“**APPs**”) and Part IIIA (Credit reporting)).

By voluntarily supplying us with your personal or credit information, you are agreeing to be bound by this Policy.

Any amendments to this Policy will be notified to you by posting an updated version on our website.

Please note that our website contains links to other websites. When a user has clicked on a link to another site, they leave our site and are no longer protected by this Policy.

Collection of information

The personal and credit information we may collect and hold about you includes:

- Contact and identification information such as your name and current or previous address, date of birth, driver’s licence number, telephone numbers and email address;
- financial information, including bank account details and credit card details;
- business details, including Australian Business Number (“ABN”);
- tax file number;
- your employment information including your superannuation fund details;
- type and amount of credit sought;
- publicly available information about an individual’s creditworthiness;
- default information;
- repayment history information;
- payment information in relation to an overdue payment; and
- other information we may be required by law to collect to perform our services or voluntarily provided by you.

Cookies

We may use “cookies” or similar technologies to collect data. A cookie is a small file, typically of letters and numbers, downloaded on to a device when you access our website. Our website collects the following information from users:

- your server address;
- your top level domain name (for example, .com, .gov, .au etc);
- the date and time of your visit to the site;
- the pages you accessed;
- the previous site you have visited; and
- the type of browser you are using.

Means of collection of personal and credit information

Your personal and credit information may be collected in a number of ways, including:

- directly by our staff when you seek, or enquire about, our services;
- when you use our website or complete a form on our website;
- when you apply to be employed or engaged by us;
- when you apply to provide services to us; or
- through the provision of our services.

In some circumstances, where it is unreasonable or impracticable to collect information from you, we may collect information about you from a third party source. For example, we may collect information from a publicly maintained record, your employer or from a government body.

In addition to the methods above, we may collect credit information from other credit providers, subject to any restrictions at law. We do not collect any credit information from credit reporting bodies.

You need not provide all the information requested by us, but this may prevent us from providing some or all of our services to you or our clients.

Use, disclosure & purpose

We collect, hold and disclose your personal and credit information for the following purposes:

- as a necessary part of providing our services;
- to promote and market our services to you or provide you with information that we believe may be of interest to you (unless as directed otherwise);
- to personalise and customise your experiences with our website and service offerings;
- to help us research the needs of our clients and to market our services with a better understanding of your needs and the needs of clients generally;
- to allow us to provide advertising material to you regarding us, our clients, and other business partners (unless as directed otherwise); and
- other purposes related to any of the above.

We will only use your information for the purpose(s) for which it was collected (“**primary purpose**”) or a purpose related to the primary purpose, if this use would be reasonably expected by you, or otherwise, with your consent.

We may disclose your information to necessary third parties, who assist us to provide, manage and administer our goods and services. Information provided to third parties will be dealt with in accordance with that entity’s privacy policy. People we may disclose your information to include:

- third parties that provide goods and services to us or through us;
- third parties, such as marketing and digital agencies, who may send to you our e-newsletters on our behalf; and
- our website host or software application providers.

We may disclose your personal information to overseas third parties located in the Philippines so that such parties may provide administrative services to us. We will take reasonable steps to ensure that your personal

and credit information will receive protection similar to that which it would have if the information were in Australia.

We do not disclose your credit information to any credit reporting bodies. Any credit information we collect and/or hold about you will be dealt with in accordance with this Policy.

Quality, access to & correction of information

You are entitled to have access to and seek correction of any personal information that we may hold about you. We require that requests for access to or to update or correct your personal information to be in writing outlining the details of your request. Such requests should be addressed to the Privacy Officer via the details provided in this Policy.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information.

We will respond to your request for access to your personal information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. We will, on request, provide you with access to your personal information or update or correct your personal information, unless we are lawfully excluded from granting your request, including if:

- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your personal information in a manner, as requested by you, providing it is reasonable to do so.

Your request for correction will be dealt with within 30 days, or such longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

We will accept your request for correction of your credit information where we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Upon accepting a request for correction of your personal information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which your information is held, to correct your personal information.

If your request for correction of credit information is accepted we will provide written notice of this correction to any entity to which we have disclosed this information previously, to the extent that this is practicable.

Storage and Security

Your personal and credit information will be stored as physical files in a secured area, on our electronic data base system and on computers with appropriate back up and security systems. Any personal or credit information which is collected via our website, or which is held on our computer systems, is protected by safeguards including physical, technical and procedural methods.

We take reasonable steps to hold information securely in electronic or physical form. We are committed to keeping secure the data you provide to us and we will take all reasonable precautions to protect your personally identifiable information from loss, misuse, interference, unauthorised access or alteration.

We aim to achieve this through:

- imposing confidentiality requirements on our employees;
- implementing policies in relation to document storage security;
- implementing security measures to govern access to our systems;
- only providing access to personal information once proper identification has been given;
- controlling access to our premises; and
- implementing website protection measures.

Dealing with us anonymously

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym. You can deal with us anonymously or using a pseudonym when making a general enquiry about the services that we can offer to you including via telephone or our website.

At the time you engage our services, it is no longer practicable for you to deal with us anonymously or using a pseudonym.

Complaints

If you believe that we have breached a term of this Policy or the Act you may submit a written complaint. The written complaint may be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 30 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

Contact us

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your information is collected or used; or
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

If you do not wish to receive direct marketing from us, please contact our Privacy Officer via the details below.
Our contact details are as follows:

Phone: 1300 724 446

Privacy Officer contact: Daniel Hardy

Postal address: 25A King William Road, Unley South Australia 5061

For more information on privacy see the Office of the Australian Information Commissioner's website at:
<http://www.oaic.gov.au>.