

# Privacy Policy

Our Privacy Policy outlines how we collect and hold your personal information and in what circumstances we may disclose that information to third parties. If you have any questions about this policy or about the use of your data, please feel free to contact us.

## **Edstart Australia Pty Ltd**

ABN 48 611 024 205, Australian credit licence 485096

## **Edstart Pty Ltd**

ABN 12 601 641 025

## **Privacy Policy and Collection Notice**

Please read carefully this privacy policy and collection notice about how we collect, use, store and disclose your personal information. We cannot process an application for credit if you do not acknowledge and agree to these terms.

You acknowledge that you have accessed and used Edstart's website.

The Privacy Act 1988 (Cth)(the Act) allows for personal information, including 'sensitive information', 'credit information' and 'credit eligibility information' (which are defined in the Act) about you (as an applicant for credit) to be collected and disclosed provided we have obtained your consent. In this document, and where appropriate a reference to personal information includes 'sensitive information', 'credit information' and 'credit eligibility information'.

This privacy notice tells you how certain organisations collect personal information about you, what they use the personal information for and who they share the personal information with. If any of those organisations collect personal information that can be used to identify you, it will take reasonable steps to notify you of that collection.

We may (from time to time) update, vary, amend or replace this privacy notice by giving you notice about the changes either on our website or by notification to you.

In this notice, a reference to "Edstart", "we", "us" or "our" (including any similar expression) is a reference to Edstart Australia Pty Ltd (ABN 48 611 024 205) and Edstart Pty Ltd (ABN 12 601 641 025). Our contact details specified in the Schedule.

### **Organisations that collect personal information about you**

We will collect personal information about you when you use our website and/or make an application for credit.

### **How we collect personal information from you**

When you use our website, we will collect personal information about you from you. Most personal information that we can collect is collected if you submit an application for credit and any supporting documentation supplied in connection with your application. If your application for credit is approved, then we can also collect personal information about you from the records we maintain about the products and services you receive from us. We can check and verify that personal information from sources referred to in your application for credit and/or in this privacy notice and consent.

### **How we collect personal information from other sources**

We can collect personal information about you from other sources in any manner permitted by the Act. We will only collect personal information from other sources where it is reasonably necessary for us to do so in relation to or in connection with your application for credit. Examples of such sources of personal information include:

- we obtain personal information (including credit information concerning your credit worthiness or history, consumer information and collection of overdue payments information either within or outside of Australia) from a Credit Reporting Body for any purpose described below;
- we obtain personal information about your credit application from any organisation described or referred to in the section titled "Organisations that collect personal information about you";

- if we are unable to contact you and we obtain publicly available personal information about you in order to update our records and your contact details;
- we may obtain personal information from any educational institution or other payee to whom we may need to make current or future payments on your behalf; or
- if there is a need to, we may potentially also exchange information with your legal, financial advisers or other representatives and advisors in relation to or in connection with your credit application.

### **When the law authorises or requires collection of personal information**

There are laws that affect organisations that require us to collect and disclose your personal information. For example, we are required to collect and disclose your personal information for assessment and verification under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth) and any rules, regulations or guidance notes made under or in connection with that Act (“AML/CTF Act”). We are entitled to request personal information from you in regards to compliance with the AML/CTF Act from you even if such information was previously sought and provided. You must comply with any request we make in this regard and if you do not provide the requested information we may be required to take action, including delaying or refusing the processing of any application for credit or disclosing information that we hold about you to our related bodies corporate, service providers or relevant government bodies and regulators including AUSTRAC (which is the body responsible for anti-money laundering and counter-terrorism compliance in Australia).

### **How your personal information may be used**

We may collect and disclose your personal information for purposes including:

- supplying (including procuring the supply to) you with information about credit or related services;
- considering whether you are eligible for credit or any related service you requested in your application;
- processing the credit application and providing you with a credit facility or related service (if we approve your application);
- administering the credit facility or any related service we have provided you, for example, to answer requests or deal with complaints;
- managing current, planned or historical payments to an educational institution, or other payee, on your behalf;
- identifying and verifying your identify (including as part of an application for credit but also subsequently, if we need to);
- telling you about other products or services we or our related companies make available and that may be of interest to you, unless you tell us not to (this relates to direct marketing);
- allowing us to run our business efficiently and to perform administrative and operational tasks;
- preventing or investigating any fraud or crime or any suspected fraud or crime;
- as required by any law, regulation or code binding on us; and
- any purpose to which you have consented.

You can tell us at any time if you no longer wish to receive direct marketing information or offers from us. We will process your request as soon as reasonably practicable after receipt of your request.

Also we may use personal information about you to:

- enable an insurer to assess the risk of providing insurance to the us or to address our arrangements with an insurer;
- consider hardship requests; and
- assess whether to securitise the credit facility and to arrange securitising the credit facility we provide.

### **How we share your personal information**

#### *Sharing information with credit providers*

We can seek from and use or give to another credit provider any information including relating to your credit worthiness, credit standing, credit history or credit capacity. In particular, we or any insurer we use may seek an opinion from a credit provider or a Credit Reporting Body and such person is authorised to provide an opinion on you.

### *Sharing information with third parties*

We may seek from and use or disclose information about you to third parties in relation to: considering your application for credit; administering your credit facility; exercising rights under your credit contract; or, any insurance policy an insurer issues to us relating to the credit we have provided you. These third parties may include:

- your representatives, attorneys, lawyers, accountants and agents that act on your behalf;
- your referees, including your employer or other individuals to confirm your identify and/or other details about you (if and when we need to check these matters);
- any other person with whom you make a joint application for credit;
- any person we consider it necessary to execute your instructions;
- any educational institution or other payee to whom we may need to make payments on your behalf;
- other insurers, re-insurers, claim assessors and investigators;
- other financial institutions including deposit taking institutions;
- organisations in debt collecting, purchasing or factoring debts;
- law enforcement agencies;
- our lawyers, agents, consultants, financial advisers and any other party involved with your credit facility;
- government and/or regulatory bodies including the Australian Taxation Office, the Australian Securities & Investments Commission, the Reserve Bank of Australia, the Australian Prudential Regulatory Authority and the Australian Financial Security Authority as required or authorised by any law. In many cases these organisations may share information with foreign authorities;
- rating agencies, to the extent necessary to allow these agencies to rate particular structured / investment products that we may develop in connection with your credit facility;
- any organisation involved or connected with the securitisation of your credit facility, including credit servicers, trust managers, trustees and security trustees, insurers and re-insurers;
- organisations that provide us, with the infrastructure in order to provide the credit services to you;
- organisations that provide us with product advice, planning, research and development;
- mailing houses and tele-marketing agencies that assist us to communicate with you; and
- service providers including IT and data consultants, agents, contractors and advisers that assist us to conduct our business.

### *Sharing information with Credit Reporting Bodies*

We can give to a Credit Reporting Body personal information (including overdue payments) about you including to allow a Credit Reporting Body to create or maintain a credit information file about you. A Credit Reporting Body may include information about you in reports that it gives other organisations (such as other credit providers) to help them assess your credit worthiness.

We will only share any credit information about you with a Credit Reporting Body if that body has a business operation in Australia and is unlikely to share credit eligibility information with organisations that do not have business operations in Australia.

Some of the information held by a Credit Reporting Body may reflect adversely on your credit worthiness, for example, where you fail to make payments or if you commit a series credit infringement (like obtaining credit by deception / fraud). If information of this nature is held on your credit file then this will likely materially affect your ability to obtain credit from other credit providers in the future.

Currently we deal with the Credit Reporting Bodies disclosed in the Schedule. Each Credit Reporting Body also has a policy about how they handle information about you. You should be able to obtain a copy of their policy by contacting them directly.

If you believe that you have been or are likely to be a victim of fraud (including identity fraud) you can request a Credit Reporting Body not to use or disclose the information they hold about you for a prescribed period of time (currently 21 days).

### *Sharing information with related companies*

We may share information about you with our related companies for the purposes described above.

### *Sharing information outside of Australia*

We may store information about you in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries through an internet connection it is not always practical to know in which country information about you may be held.

We will take reasonable steps to ensure that any overseas organisation that receives your personal information will comply with the Act.

### **If you do not provide personal information**

If you do not provide your personal information to us, it may not be possible:

- to provide you with the product or service you have applied for. For example, if personal information is not disclosed to us we will not be able to process your application for credit. If personal information is not disclosed to an insurer (if we require insurance in relation to your credit facility), it may not be able to process our request for insurance. In that case, we will likely not be able to proceed with your application for credit;
- to manage or administer the credit facility we provide to you;
- to verify your identity or protect against fraud; or
- to let you know about other products or services that might be suitable for your financial needs (unless you opt out of this by telling us that you do not wish to receive such information).

### **Information about other people**

If for any reason you give us personal information about any other person when using our website, for example when you submit an application for credit:

- we are entitled to assume that you have sought their consent to the disclosure of such personal information to us;
- we have collected their personal information to assess a credit application, to manage any credit facility you receive from us and for any other purpose set out in this document;
- we may exchange this personal information with other organisations set out in this document;
- we handle their personal information in the same way as set out in this document and they can:
  - access or request a copy of this privacy notice; or
  - access the information we hold about them, by using the contact details for us in the Schedule; and
- you may not be able to get credit from us or we may not accept your application for credit unless we obtain their personal information.

### **Anonymity and pseudonymity**

Where possible, we will provide information of a general nature such as for example, in relation to the products and services we supply to unidentified individuals via our website. However, we are not able to deal with an application for credit if you do not wish to identify yourself.

### **Information security**

We take reasonable steps to protect all information which we hold (including any personal or sensitive information) from misuse, loss, unauthorised access, modification or disclosure.

### **Marketing and opt-out**

We may also use the information including personal information provided by you for marketing and research purposes, to analyse and improve products and services and to inform you of products and services provided by us, our related entities or preferred suppliers which we consider may be of value or interest to you, unless you tell us (see marketing opt) or have previously told us not to.

### **Using our website and cookies**

We may collect personal information about you when you use and access our website. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

### **Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

### **Accessing your Personal Information**

Unless we are entitled to withhold access to your personal information, you have the right to request access to any personal information held by us which relates to you. We may charge a reasonable fee where access to personal information is provided. Any requests for access to your personal information should be made in writing to the Privacy Officer (specified below). You also have the right to request the correction of any personal information which relates to you that is inaccurate, incomplete or out-of-date.

If you require any further information about our management of personal information or have any queries or complaints, you should contact us using the details specified in the Schedule.

### **Making a complaint**

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

### **Consent and agreement**

By accessing and using our website and in particular, by checking the box that you have "read and understood our privacy policy and collection notice" in your application for credit, you will be taken to have received notification of this privacy policy and collection notice and given your agreement to the matters set out in this document.

Also, accessing and using our website and in particular, by checking the box that you have "read and understood our privacy policy and collection notice" in your application for credit, you also declare that you are over the age of 18 years and that the information contained in the application for credit is true and correct in every respect and it is upon this basis that you make the application.

## Schedule

In this notice and acknowledgement:

**Credit Reporting Body** means:

Equifax Australia Information Services and Solutions Pty Limited

Address: GPO Box 964, North Sydney NSW 2059

Website: [www.equifax.com.au/privacy](http://www.equifax.com.au/privacy)

Online: [www.mycreditfile.com.au](http://www.mycreditfile.com.au)

Equifax Australia's credit reporting policy is set out at [www.equifax.com.au/privacy](http://www.equifax.com.au/privacy)

Including any other Credit Reporting Body that we notify to you in relation to your application for credit or guarantee or loan.

### **Our Contact Details:**

Address: Level 2, 50 Bridge Street, SYDNEY NSW 2000

Telephone: 1300 139 445

Email: [contact@edstart.com.au](mailto:contact@edstart.com.au)