

# Privacy Policy

This privacy policy refers to Key Strategy Solutions Pty Ltd ACN 134 911 603 as a Credit Representative Number 384896 of **Vow Financial Pty Ltd ACN 138 789 161, Australian Credit Licence 390261**, and its related businesses.

We want you to be confident that the personal information you provide to us is treated with the highest degree of integrity and privacy. However, it is equally important to us that we provide the best possible service across our wide range of products and services. To achieve this aim we need to make the most efficient use of your personal 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. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

In handling your personal information, we are committed to complying with the Privacy Act and Australian Privacy Principles.

## What is “personal information”

**Personal information** is any information or opinion about you in which you are identified, or in which your identity can reasonably be ascertained from the information or opinion. It does not matter whether the information or opinion is true or not, or whether it is recorded in a material form or not. The personal information we hold about you may include credit information.

**Credit information** is information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

The kinds of personal information we may collect about you include your name, date of birth, address, account details, occupation, and any other information we made need to identify you.

If you are applying for finance we may also collect the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details and proof of earnings, expenses and other financial information. If you apply for any insurance product through us we may also collect your health information. We will only collect health information from you with your consent.

## Collection of information

We collect personal information for the purposes of assessing your application for finance and managing that finance. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

Collecting your personal information also allows us to identify and protect your personal information, including account information and services, from unauthorised access. We will only collect such personal information if it is necessary to provide our products and services.

Where possible we collect your personal information directly from you. You provide this information to us when request products and services or make an enquiry. We may also collect your personal information from credit reporting bodies, finance brokers and other people such as accountants and lawyers.

In most cases we will request your consent to any collection and take reasonable steps to ensure that you are made aware of who we are, the purpose of the collection, how you can access your information and who we may disclose your information to.

It will typically 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.

## **Use and disclosure of personal information**

We may use or disclose personal information for the primary purpose for which it was collected. We may also use the information for a related purpose and where it would reasonably be expected by you that we use the information in such a way. This information is only disclosed to third parties in the circumstances covered in this policy or as otherwise notified to you at the time of collection of the information.

We may need to disclose aspects of your personal information to:

- to prospective funders or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as 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 Courter Terrorism Financing Act 2006 (Cth)*;
- to investors, agents or advisers, or any entity that has an interest in our business; or
- to your employer, referees or identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

1. the person or organisation has a commitment to protecting your personal information at least equal to our commitment; or
2. you have consented to us making the disclosure.

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 may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

## **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 telephoning us on 1300 887 630. 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.

## **Ensuring your personal information is up-to-date**

We rely on the personal information we hold about you to efficiently conduct our business of providing or arranging products and services. For this reason, it is very important that the personal information we collect from you is accurate, complete and up-to-date.

During the course of our relationship with you we may ask you to tell us of any changes to your personal information. We also invite you to contact us at any time to update or correct your personal information.

## **Security and storage**

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

## **Access and correction to your personal information**

You may request access to any of the personal information we hold about you. In most cases, details of the personal information we hold about you is available by contacting us.

If the information you seek is not readily available, for example, archived data, then we will endeavour to provide this to you within 30 days of your request. We reserve the right to charge you a fee for this retrieval.

We may be required by law or by good business practice to retain your personal information for a period of time after you have ceased your relationship with us. After the required time has passed we attend to the secure destruction or deletion of your personal information.

We are not always required to provide you with access to your personal information upon your request.

We may refuse you access to personal information in a number of circumstances, such as where the information may relate to existing or anticipated legal proceedings with you, where denying access is required or authorised by law, or where the request for access is regarded as frivolous or vexatious.

If we deny your request for access to, or refuse your request to correct your personal information, we will explain why and will keep a record of your request on our file.

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.

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

### **Using 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.

### **Collection of sensitive information**

Personal information concerning particular topics is regarded as sensitive information. Sensitive information includes 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;
- membership of a trade union;
- sexual preferences or practices;
- criminal record; and
- health.

We generally have very limited need to obtain such information, however if such information is needed then it will only be obtained and/or used with your consent. If, in the course of arranging your application or facilities, such information does come into our possession from a third party, we will seek your consent to collect, store and use this should we consider such use necessary in your application.

### **Our Privacy Policy may change from time to time**

We constantly review all our policies and procedures to keep up to date with changes in the law, technology and market practice. As a result we may change this Privacy Policy from time to time.

This Privacy Policy was last amended in 23 March 2017.

## Complaints

If you are dissatisfied 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 complaints officer on **Vow Financial Pty Ltd** Level 11/ 1 Chifley Square Sydney 2000 Phone: 1300656922 or Key Strategy Solutions Pty Ltd on 1300 887 630

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## Contacting us

If you require further information regarding our Privacy Policy, please contact us at the following address, P O Box 165 OATLANDS NSW 2117.

Should you wish find out more about the privacy legislation or the Australian Privacy Principles, we recommend that you visit the Federal Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au).