

# Finkey Privacy Policy and Credit Reporting Policy

In this Privacy Policy, 'us', 'we' or 'our' means Finkey Capital Pty Ltd ABN 37 662 168 916 an is an authorised holder of Australian Credit Licence no.550288. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information (including for consumer or commercial credit). We are bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) ('**Privacy Act**').

We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy. By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

We may collect, use, disclose, hold or manage personal information or do any things set out in this document on our own behalf or as agent of a principal (whether disclosed or not). The information given in this document is given by both us and any principal (whether disclosed or not). Principal's identity is available on request.

## **What personal information do we collect?**

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number and other contact details;
- age or date of birth;
- credit card information;
- bank details;
- identification information, such as your driver's licence or passport number;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites,
- ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;

- information you provide to us through customer surveys;
- current and historical energy usage, load and consumption data, meter type and model and other statistics on your use of energy products and associated metering software, including products and software which are financed by us, where we have obtained your consent; or
- any other personal information that may be required in order to facilitate your dealings with us.

**We will only collect sensitive information with your consent.**

How do we collect personal information?

We may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:

- submit any enquiry;
- register on our website or app;
- communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites; or
- interact with our sites, social media, services, content and advertising.

If you do not provide the information requested by us, we may not be able to provide you with our services.

There may be occasions when information is collected from third parties, such as a partner or spouse who contacts us on your behalf, from our accredited vendors, from our contractors who supply services to us, through our business partners, from credit reporting bodies or from a publicly maintained record. If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described in this Privacy Policy. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy. The individual must also provide the consents set out in this Privacy Policy in respect of how we will deal with their personal information.

We also collect information obtained as a result of credit checks that you authorise us to carry out, as detailed further in our Credit Reporting Policy.

**How do we use your personal information?**

We use your personal information for the purpose for which it has been provided, for reasonably related secondary purposes, any other purpose you have consented to and any other purpose permitted under the Privacy Act. This may include using your personal information for the following purposes:

- to enable you to access and use our financial products and services and related products and services;

- to become eligible and enable you to use our financial products and services your information will be forwarded to one of our accredited Vendors;
- to improve our products and developing new products;
- to determine your eligibility for other products and services provided by us, based on your usage of existing products and services;
- to be used for identity verification purposes, which may involve the use of third party systems, and matching information with Official Record Holders;
- to operate, protect, improve and optimise our website, app, business and our users' experience and our products and services, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

### **Do we use your personal information for direct marketing?**

We and/or our carefully selected business partners may send you direct marketing communications and information about our financial products and services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the Privacy Act. By providing us with your personal information, you consent to us and our business partners using your information to contact you on an ongoing basis for this purpose, including by mail, email, SMS and telephone. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g., an unsubscribe link).

### **To whom do we disclose your personal information?**

We may disclose personal information for the purposes described in this Privacy Policy to:

- our employees and related bodies corporate;
- your agents;
- referrers and other intermediaries;
- credit and debt agencies
- third parties for securitisation purposes
- third party organisations that carry out functions on our behalf;
- third party suppliers and service providers (including providers for the operation of our websites, platform, CRM, application processing and/or our business or in connection with providing our products and services to you);

- professional advisers, dealers and agents;
- payment systems operators (e.g. merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case-by-case basis.

### **Disclosure of personal information outside Australia**

We may disclose personal information outside of Australia to credit check companies and cloud services providers located in the US, UK, Philippines, Singapore, Spain, Costa Rica, Finland, Mongolia, Israel, Bulgaria, Canada, India, Japan, Mexico and New Zealand.

When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we may not be required to ensure that overseas recipients handle that personal information in compliance with Australian privacy law. Where possible, we will endeavour to take reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles. You accept that we will not be liable for the information once it is disclosed overseas, and you waive your right to make any claim against us under the Australian privacy law in the event of any breach.

### **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 may 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.

## **Security**

We may hold your personal information in either electronic or hard copy form and your personal information may be stored on behalf of third- party service providers. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

Measures that we may take to protect your personal information include, but are not limited to:

- using appropriate information technology and processes;
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do;
- protecting paper documents from unauthorised access or use through security systems we deploy over our physical premises;
- using computer and network security systems with appropriate firewalls, encryption
- technology and passwords for the protection of electronic files;
- securely destroying or “de-identifying” personal information if we no longer require it
- subject to our legal obligations to keep some information for certain prescribed periods; and
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

## **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 or correcting your personal information**

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

### **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.

### **Contact Us**

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

The Privacy Officer  
Finkey Capital Pty Ltd  
**Phone:** 1300 346 539  
**Email:** [privacy@finkey.co](mailto:privacy@finkey.co)  
**Mail:** Suite 81/26-32 Pirrama Rd, Pyrmont NSW 2009

If you require further information about Privacy laws generally, please contact:

The Privacy Commissioner  
Office of the Federal Privacy Commissioner  
**Mail:** GPO Box 5218, Sydney NSW 1042  
**Phone:** 1300 363 992  
**Fax:** (02) 9284 9666  
**Internet:** [www.oaic.gov.au](http://www.oaic.gov.au)

See the separate Finkey Statement of Notifiable Matters

## **You Accept ALL Our Terms**

By checking any box or highlighting any responsive buttons titled 'I accept the Privacy Policy, Privacy Statement and Electronic Communication Consent', 'I accept all Privacy, Terms and Conditions, Terms of Use, Consents, Advice, Statements, and Notices available on Finkey's website [finkey.co](http://finkey.co), clicking any 'acknowledgement' or 'acceptance' buttons after inputting your personal information, clicking buttons labelled 'apply', 'apply now', 'submit', 'submit application', 'agree', 'send', or providing consent to your Vendor, third-party or accredited organisation obtaining your contact information to recommend you to Finkey, you agree to the collection, use and disclosure of your personal information as outlined in this statement.