



Privacy Policy – MAPLE COMMERCIAL FINANCE PTY LTD (ACN 639 196 802)

1. Our commitment to privacy

Maple Commercial Finance Pty Ltd (ACN 639 196 802) (**we, us, our**) is committed to protecting the privacy and security of your personal and credit-related information. This policy explains how we manage personal information (including credit-related information) about individuals, including customers and prospective customers, guarantors and prospective guarantors, and brokers, in accordance with the Privacy Act.

If you have any questions about our Privacy and Credit Reporting Policy, please contact us using the details under "Contact details" below.

1.1 What is personal information

"**Personal information**" means information or an opinion about an individual or reasonably identifiable individual, whether or not the information is true. It does not include anonymous information that cannot reasonably identify a specific individual.

1.2 What is credit-related information

There are three types of credit-related information:

- "**Credit information**" means personal information we collect in connection with a credit application or credit facility we provide, including information that identifies you, the amount you've borrowed, repayment information, default information, personal insolvency information.
- "**Credit reporting information**" is your credit report and credit score, produced by a credit reporting body.
- "**Credit eligibility information**" is your credit reporting information and any further information a credit provider derives from your credit reporting information, has bearing on your creditworthiness, and is used/could be used in establishing your eligibility for consumer credit.

We deal with credit-related information for purposes related to the provision of commercial credit only.

2. What information do we collect from you

2.1 Personal information

The type of information we collect depends on the nature of our relationship and dealings with you. The following table describes the types of information we normally collect about our customers and guarantors. This may include:

| | |
|--|--|
| Identification information | Your name and date of birth, information to verify your identification (such as passport, driver's licence, utility bills) |
| Contact information | Your postal or email address, telephone numbers |
| Billing and financial information | Your assets, debts, income, expenses, securities, transactional and account information, billing address, bank account and payment information |
| Employer information | Your employer's name and contact details |



We will also collect any additional information about you that is reasonably necessary to allow us to deliver our services and respond to enquiries.

We also collect personal information about our brokers for the purposes of assessing eligibility and monitoring the ongoing suitability of brokers, including broker accreditation details, firm details, personal insolvency, criminal history and compliance records.

2.2 Credit-related information

We may also collect your credit-related information for the purpose of assessing an application for credit, under which you are a borrower or a guarantor. This includes:

- (a) the type and amount of credit sought in an application made by you or by a person for whom you are, or propose to be, a guarantor;
- (b) details about your credit liabilities, including the nature and maximum amount of credit provided to you;
- (c) any defaults by you or a person for whom you are or propose to be a guarantor for;
- (d) information about your repayment history in relation to other credit facilities;
- (e) whether, in the opinion of another credit provider, you have committed a serious credit infringement; and
- (f) details about credit-related court proceedings and personal insolvency.

2.3 Sensitive information

We will not normally collect sensitive information from you, unless required by law or with your consent when you are applying for a loan with us or have related dealings with us. The kinds of sensitive information we collect may include professional membership information and criminal record information.

3. How we collect your information

There are a number of ways in which we may collect personal and credit-related information, depending on our relationship with you.

Most of the time, we will collect information about you through a third party broker through whom you have applied for a loan for or for which you are listed as a guarantor. We will also collect information about you from your authorised agents, commercial and business information providers, public registers maintained by the Australian Securities and Investments Commission, or other publicly available information.

We may also collect credit-related information about you from credit reporting bodies and will obtain your express consent to do so where required by law.

3.1 Online activity

We may also collect information from you when you visit our website. This is collected for the purposes of producing website statistics and improving your web browser experience. The types of information collected include:

- (a) your device's IP address;
- (b) dates and times of visits to each page;
- (c) search terms and pages visited on our website;
- (d) geographic location;
- (e) device type and browser used; and
- (f) whether you've accessed a third party site.



No attempt is made to identify individual users from this information. Where you are identifiable (because for example, you are logged into your account), we will handle your personal information in accordance with this policy.

Some of this information is collected using cookies. A cookie is a small data file placed on your computer or device by a website. Cookies may be accessed at a later time by our web server. Cookies store information about your use of our website and also allow us to provide you with a more personalised service when using our website.

If you do not wish to have cookies placed on your computer or device, you should set your browser preferences to block all cookies before accessing our website. However, blocking cookies may limit your experience on our website.

3.2 Third party links

Our website contains links to the websites of third parties. If you access those third party websites, they may collect information about you. We do not collect information about you from the third parties that operate a linked website. You will need to contact them about their Privacy Policy.

3.3 Information you provide about other people

If you provide personal information to us about another individual, you must ensure that:

- you are entitled to disclose that information to us; and
- without us taking any further steps, we may collect, use and disclose such information for the purposes described in this policy.

3.4 Anonymity and pseudonym

If you have a general enquiry, you may deal with us anonymously or by using a pseudonym. However, we will let you know where it is impracticable for us to deal with you in this way.

4. How we hold your information

We store your personal information (including credit-related information) in paper-based, electronic and other forms. We also use secure cloud-based storage facilities to store the information we hold about you.

We take reasonable steps to protect the personal and credit-related information which we hold about you from misuse, interference or loss, as well as unauthorised access, modification or disclosure. This includes restricting access to personal information to employees who have business reasons to do so and auditing and monitoring of staff access to personal information.

If we no longer require your information, and are not required by law to keep it, we will take reasonable steps to destroy or de-identify it.

5. How we use or disclose your information

5.1 How we use your personal information

The main purposes for which we may collect and use your personal information include to:

- (a) provide you with information about our products and services;
- (b) assess your eligibility for a product or service;
- (c) administer our products and services;
- (d) produce website statistics and improve your web browser experience (see "Online activity" section above);
- (e) open and maintain an account for you or an entity connected with you, including providing you with statements as required;



- (f) conduct market research and analysis relating to our products and services;
- (g) respond to your specific requests or complaints;
- (h) notify you of any products that may be of interest to you (unless you opt out of such communications – see "Direct marketing" section below);
- (i) audit and monitor the services we provide to you, including to manage risk;
- (j) enable us to manage complaints and legal proceedings;
- (k) investigate, identify or prevent any actual or suspected fraud or unlawful activity;
- (l) update the personal information we hold about you;
- (m) meet our obligations under law, for example, under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) or Australian taxation laws; and
- (n) enable us to manage and recover debts.

5.2 How we use your credit-related information

We may collect and use your credit-related information to:

- (a) assess your application for credit, or whether we accept you as a guarantor in relation to such an application;
- (b) assist you in avoiding a default on your credit obligations; and
- (c) manage credit we provide to you and the guarantee related to that credit; and
- (d) any other purpose permitted by law.

5.3 Direct marketing

We may notify you of products or services that may be of interest to you, where we are permitted to do so by law. We may do so using telephone, SMS, mail or email. You have the option of requesting not to receive marketing communications from us at any time.

5.4 Disclosure of personal and credit-related information to third parties

We may disclose personal and credit-related information to third parties where permitted by law including:

- (a) suppliers, lenders, credit or equity providers (including insurance providers) and service providers, professional advisers, dealers and agents;
- (b) our existing or potential agents or business partners;
- (c) representatives or other persons authorised by you to receive information held by us (e.g., under powers of attorney);
- (d) a guarantor or a person who has provided security for credit, where you are the borrower or associated with the borrower and have consented to it (unless we are enforcing a guarantee for credit);
- (e) credit reporting bodies (see "Disclosure to credit reporting bodies" below);
- (f) a debt collection agency for the purposes of collecting overdue payment; and
- (g) other persons, including government regulatory bodies and law enforcement agencies, as required or permitted by law.

5.5 Disclosure to credit reporting bodies

We may share information about you to a credit reporting body if you are applying for credit or have obtained credit from us or if you are a guarantor or prospective guarantor.



We may disclose your personal and credit-related information to the following credit reporting bodies:

Equifax Australia Information Services and Solutions Pty Limited
Equifax Public Access
PO Box 964
North Sydney NSW 2059
138 332
www.mycreditfile.com.au

To read the relevant credit reporting bodies' privacy policy, visit their website.

5.6 Disclosure outside of Australia

We currently do not share any of your information with organisations outside Australia. We will only disclose personal information to an overseas recipient if we are permitted by law to do so.

6. Request for access and correction

We will take reasonable steps to ensure that the personal information and credit-related information we collect remains accurate, up to date and complete.

You have the right to seek access to, or correction of, your personal and credit-related information held by us. We may require evidence of your identity as part of the process of providing you with access to or correction of your information.

If you request access or correction to your personal information, we will:

- give you access to or correct your personal information held by us, within 30 days (unless we refuse or unusual circumstances apply); and
- if you have requested access to credit-related information, inform you that you should also request access to credit reporting information about you held by credit reporting bodies, to make sure you have the most up-to-date information.

If we can't give you access to or correct your information, we will explain the reasons why in writing.

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in providing you with access.

7. Complaints

If you have a complaint about the way we have handled your personal information (including credit-related information), please contact us on our "Contact details" below. We will investigate your complaint and endeavour to resolve any issues to your satisfaction.

If you are unsatisfied with the way we have handled your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

7.1 Your right to refuse pre-screening for marketing purposes

You have the right to request that a credit reporting body does not use your credit reporting information for the purpose of pre-screening for direct marketing. You also have the right to request that a credit reporting body does not use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud (for example, if you suspect someone used your identity to apply for credit). These requests should be made directly to the credit reporting body.

If you have concerns about how a credit reporting body has handled your credit-related information, you should contact them directly.



8. Contact details

To request access or correction to your personal information and credit-related information, make a complaint, or to request more information about our information handling practices, please contact the Privacy Officer at

Phone: (02) 8311 2373

Email: privacy@maplecommercial.com.au

If you want more information about Australian privacy laws, please contact the OAIC at:

Mail: GPO Box 5218, Sydney NSW 1042

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: <http://www.oaic.gov.au>

For contact information for the relevant credit reporting bodies, see paragraph 5.5 "**Disclosure to credit reporting bodies**".

9. Changes to this privacy policy

This policy was last updated on in December 2021 and is subject to change.

Any changes to our policy will be published on our website. You may obtain a copy of our current policy from our website or by contacting us on the details above. It is your responsibility to check the website from time to time to determine whether there have been any changes.