

# Privacy Policy

## Who are we?

'We', 'us' and 'our' refer to etika Australia Pty Ltd ACN 629 009 025 and our related businesses in Australia, New Zealand and the United Kingdom. In Australia, including etika Australia Loan SPV Pty Ltd ACN 635 253 646.

## Our commitment to protect your privacy

At etika we commit to ethical practices in everything we do, and we understand how important it is to protect your personal information. This document sets out our commitment in respect to the personal information we hold about you, how we collect, use and disclose your personal information, how we aim to protect your privacy, and your rights in relation to your personal information managed by us.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it for 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 the protection of your personal information. In handling your personal information we will comply with applicable laws, being:

- In Australia: the Australian Privacy Act 1988 and Australian Privacy Principles (APPs);
- In New Zealand: the New Zealand Privacy Act 2020 and New Zealand Privacy Principles,

and any other relevant laws, regulations and codes relating to privacy ('Privacy Law').

## Who does this Privacy Policy apply to?

This policy applies when you sign up for, access, or use our services, features, technologies or functions offered (collectively 'etika Services') both past and present, and in relation to personal information we may otherwise collect during the course of our business as set out in this policy.

## What kind of personal information we collect

When we refer to personal information, we mean information or an opinion from which your identity is reasonably apparent.

The kinds of personal information we may collect and hold about you varies according to the product and service being provided and may include your:

- identification and contact information such as your name, date of birth, gender, address, email address and telephone;
- government identifiers necessary to verify your identity and eligibility for our products and services such as your tax file number, driver licence, passport, and visa particulars;
- financial information such as personal banking details, income, expenses, assets and liabilities, employment and occupation, payment history and transactions with us or third parties;
- credit related information (see also below);
- other details relating to our relationship with you, such as details of agreements or other arrangements you may have with us, billing and shipping information and any information contained in correspondence with us, including if we deal with you in a capacity other than a customer;
- information about you which we are required or authorized to collect by law, including under the Anti-Money Laundering and Counter-Terrorism Financing Act; and
- any other information lawfully obtainable under Privacy Law.

## Credit Related Information

When you apply for, or we provide etika Services to you, we may access your credit related information held with a credit reporting body for the purpose of considering your application for the etika Service(s).

This information means:

- Credit information, which is information which includes your identity; the type, terms and maximum amount of credit provided to you, including when that credit was provided and when it was repaid; repayment history information, default information (including overdue payments); payment information; new arrangement information; details of any serious credit infringements; court proceedings information; personal insolvency information and publicly available information; and
- Credit eligibility information, which is credit reporting information supplied to us by a credit reporting body.

We may also collect and use credit related information as follows:

- by creating and using other analytics including credit scores or risk ratings, which we derive from the information we receive about you; and
- by collecting and using credit related information in providing the etika Services to you, including information regarding the credit you hold with or have received from us, the type and amount of this credit, the terms on

which that credit is provided, when your account was opened and closed, how you repaid that credit, any repayment(s) you have made or missed, any default on your obligations (or a correction of that default) or any serious infringement you commit, or any financial hardship arrangements. We comply with applicable laws including (in Australia) the Australian Credit Reporting Privacy Code; and (in New Zealand) the New Zealand Credit Reporting Privacy Code 2004 that applies to the collection, use and disclosure in our handling of your credit related information.

## Sensitive Personal Information

In some circumstances we may collect sensitive personal information about you, such as when assessing and managing applications for financial hardship. Sensitive information is personal information which includes information about health, racial and ethnic origin, sexual preferences, criminal record, religious or philosophical beliefs, political opinions or associations and trade union memberships or associations. We will only collect sensitive personal information which is relevant to the purpose of which it is collected.

## Why we collect and use your personal information

We only collect, hold and disclose information about you where it is reasonably necessary for us to perform our business activities or required by law. These purposes include but are not limited to:

- assessing your eligibility for, and providing, etika Services;
- managing our products, services or other relationships and arrangements;
- assessing your suitability to be a guarantor;
- communicating with you or your representatives in relation to the etika Services;
- protecting our legitimate interests, for example registering a security interest, making a claim under an insurance policy, or taking or responding to any legal action;
- addressing any complaints or action between you and us;
- in the collection and recovery of money owed to us, including overdue amounts;
- internal operational and administrative processes;
- market research into customer preferences and requirements;
- analysing and improving etika Services;
- developing new etika Services;
- notifying you about changes to our products and services;
- delivering targeted marketing;
- complying with our legal obligations;
- where you apply for a position at etika, evaluating that application;

- identifying, preventing or investigating any known or suspected fraud, misconduct or unlawful activity;
- any purpose which is required or authorized by law;
- entering into a joint venture with a business operated by a third party, or sell or otherwise transfer part or all of the etika business or its assets (including any etika Services) to a third party; and
- other purposes to which you have consented.

You have a choice to supply us with the information we request. In most circumstances it will be necessary for us to hold and process your personal information in order to successfully provide etika Services to you.

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 promotional offers.

## How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. This can include when you:

- visit or log in to our website;
- submit applications and other forms through our online services, by email, SMS, Whatsapp or other direct messaging services, verbally and/or in hard copy;
- contact us for any reason including, but not limited to, requesting further services, updating your personal information, seeking assistance, or reporting issues with our services and interacting with us on social media sites;
- opt in to our marketing communications and;
- apply for a career with etika.

We may also collect information about you from other sources, such as:

- public registers or social media platforms;
- public or commercial information service providers (such as business, government and credit information providers);
- our merchant supplier partners payment service providers;
- external dispute resolution schemes, law enforcement and government bodies; and
- other third parties involved in the provision of etika Services or whom you have authorised to act on your behalf such as your lawyer or accountant, or joint borrower(s) or account holder(s);
- persons providing any security interests on your behalf, including a guarantee.

In addition, we may collect information about you indirectly by creating insights and other information about you in analysing other information which we already hold.

## Cookies

We may also collect information about you from your browser or device. For example, this Site uses cookies which are small data files that allow us to recognise you as a customer if you return to the etika Site using the same computer and browser.

We use cookies to provide our customers with an enhanced user experience and to target advertising to you that we think you may be interested in. For example, cookies allow us to save your password so you do not have to re-enter it every time you visit our site.

Most web browsers automatically accept cookies. If you choose to decline our cookies this may interfere with your use of our Site and Services.

## Do we disclose your personal information?

We may disclose your personal information for purposes for which it was collected or as permitted by Privacy Law.

Parties who we may disclose your personal information to (other than your credit information and credit eligibility information) include:

- our related entities in Australia, New Zealand and the United Kingdom;
- partners, suppliers and service providers who help with our business operations including, identity verification, payment collection, call centre operators, debt recovery, fraud prevention, claims related providers, printing and postal services, and technology services;
- partners and suppliers that are in financial and payment systems such as banks, credit providers and credit card associations;
- our merchant supplier partners to allow them to provide you with goods or services, respond to a complaint or query by you, or assist them to improve the quality and service they provide to you;
- if you are a borrower and another person or persons has or will provide a security interest on your behalf (including a guarantee), to those person(s);
- if you are have or will provide a security interest on behalf of a borrower (including a guarantee), to the borrower;
- auditors, insurers and re-insurers;
- investors, agents or advisers, trustees or

rating agencies;

- your nominated authorised representatives and referees;
- government agencies or officials, law enforcement or other third parties where we are required, compelled or authorised to do so by law;
- organisations that provide products or services used or marketed by us;
- prospective funders or other intermediaries in relation to your requirements;
- other third parties you have consented us to do so.

## Disclosure of your credit related information

If you fail to meet your payment obligations in relation to any etika Services that we have provided or arranged, or you have committed a serious credit infringement, or as otherwise required by law, we may disclose your credit information, credit eligibility information and other personal information to one or more credit reporting bodies. We may also share your credit information and credit eligibility information with:

- our related entities in Australia, New Zealand and the United Kingdom;
- debt collection agents;
- external dispute resolution schemes, or to other persons where directed to do so by such a scheme;
- enforcement bodies in some situations;
- your guarantor(s);
- other persons to whom we are required by law to disclose this information.

### Pre-disclosure steps

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

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

## How safe and secure is your personal information that we hold?

We will take a range of measures and reasonable steps to protect your personal information. Your personal information will always be stored 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.

## Direct marketing

From time to time we may use your personal information to provide you with current information about etika Services, 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 using the unsubscribe function on email communication or by contacting us on the details set out below. 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.

## Access and correction to your personal and credit information

It is important to us that the personal information we hold about you is accurate, up-to-date, complete, relevant and not misleading and take reasonable steps to ensure this. You have a right to access and seek correction of your personal information, including credit-related information that is held by us subject to some exceptions specified under Privacy Law.

We will generally rely on you to ensure the information we hold about you is accurate or complete, and we may ask you to inform us if any of your personal information has changed during the course of our relationship with you.

If at any time you would like to access or amend the personal information we hold about you please contact us on the details set out below. We may need to consult with other finance providers or credit reporting bodies or entities in order to process your request.

There may be situations where we are not required to provide you with access to your personal or credit-related information, for example, if the information relates to existing or anticipated legal proceedings, if your request is vexatious or if the information is commercially sensitive.

A written explanation will be provided to you if we deny you access to the personal or credit-related information we hold about you explaining the reasons for the refusal and details of ways in which you can raise a complaint.

If at any time you would like access to, or have questions about, your credit related personal information you can contact the following credit reporting bodies for more information:

Australia Equifax Pty Ltd  
[www.equifax.com.au](http://www.equifax.com.au)

Illion Australia Pty Ltd  
[www.illion.com.au](http://www.illion.com.au)

Illion New Zealand Limited  
[www.illion.co.nz](http://www.illion.co.nz)

CreditorWatch Pty Ltd  
[www.creditorwatch.com.au](http://www.creditorwatch.com.au)

## Complaints and disputes

If you have concerns or are dissatisfied with the way we have dealt with your personal information, or you have a complaint about our compliance with Privacy Law, you may contact our Privacy Officer on the contact details set out below.

At all times privacy complaints are taken seriously and confidentially in accordance with our Complaints Handling Policy.

In the event you are dissatisfied with the outcome of your privacy complaint, you may refer to the independent privacy regulator by contacting them on the below details:

Australia  
Office of the Australian Information  
Commissioner (OAIC)  
[www.oaic.gov.au](http://www.oaic.gov.au)  
1300 363 992

New Zealand  
Office of the Privacy Commissioner  
[www.privacy.org.nz](http://www.privacy.org.nz)  
0800 803 909

## Further information

Please contact us if you would like more information on our approach to privacy or about the way we manage your personal or credit-related information.

## Change in our privacy policy

This Privacy Policy may be updated from time to time. The updated policy will be available on our website by following the 'Privacy' link. You should review it periodically so that you are aware of any changes.

We may notify you by email or otherwise off material changes which may impact you. You may request this policy in an alternative form by contacting us on the details set out below.

## Contact us

Please direct all privacy related queries and complaints to our Privacy Officer by email to [privacy.officer@etika.com](mailto:privacy.officer@etika.com) or by writing to PO Box 606 North Sydney NSW 2059.

This privacy policy was updated in October 2023.