

This policy provides information as to the kind of personal information that we collect and the way we use it. In this privacy policy, the terms “we”, “us”, “our”, “WCF Medical” are references to WCF Medical Pty Ltd ACN 609 032 242 trading as “MacCredit”. In the context of the provision of credit facilities, WCF Medical Pty Ltd is a credit representative number 484002 appointed under the Australian Credit Licence of Australian Finance Group ACN 066 385 822 (“AFG”).

The term “Website” means the website under the domain name [maccredit.com.au](http://maccredit.com.au) and unless the context requires otherwise, includes any other sites operated by us where this privacy policy is accessible. The term “you”, “your” and “user” refers to you as the user of the Website and/or as our customer. If you are our customer, additional information about our handling of your personal information may apply, for example under a privacy declaration or terms and conditions applicable to the product or service you apply for or obtain from or through us.

We are committed to respecting the privacy and protecting the personal information of our users and customers. We are bound by privacy principles under the Privacy Act (1988) (Cth) which are applicable to private sector organisations, and other laws which govern the handling of personal information. We sometimes handle personal information relying on exemptions under these laws, for example in relation to employee records. Any permitted handling of personal information under such exemptions will take priority over this privacy policy to the extent of any inconsistency.

## **1 Information collection and use**

We may collect various types of information from you. Some of this information is personal information, some is non-personal. Collection of non-personal information is dealt with in section 7 below.

We may collect personal information (being information about you from which your identity is apparent or can reasonably be determined) for purposes including:

1. responding to your queries;
2. arranging and/or providing financial products and services for you, including assessing applications for finance;
3. establishing, managing, administering, evaluating and improving our products or services, including credit scoring, portfolio analysis, research, planning, service development, security and risk management;
4. identifying you and investigating and protecting against fraud and unlawful activity;
5. complying with laws which apply to us (including counter-terrorism financing and anti-money laundering laws), assisting regulatory authorities and protecting our lawful interests; and
6. subject to our legal obligations and your requests to opt-out, to provide you with promotional information about financial and investment products and services on an ongoing basis, by any means including telephone, email and other electronic messages (we

may also share your personal information with our related bodies corporate and joint promotion partners for this purpose).

We may not be able to do these things without your personal information. For example, we may not be able to provide you with our services or respond to your queries.

If you do not wish your personal information to be used or disclosed for the promotional purposes described above, please contact us to express your wish to opt out.

The types of personal information collected may include your name, address, postal or email details, financial details, credit related personal information (see section 6 below) and other information that we may consider necessary. 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 and expenses. As we sometimes assist with finance in relation to health and medical matters, we may collect information related to these matters in connection with relevant finance applications and enquiries.

Where reasonable and practicable to do so, we will generally collect your personal information directly from you. Collection can occur in a number of ways, including when you apply for or request information in relation to a product or service, including where you do so over the telephone or internet. Personal information may also be collected during the course of our business relationship with you, for example when discussing your existing financial position or through your use of our services. We may record your interactions with us, including your telephone conversations with us and your use of our emails and website.

Occasionally we may collect personal information about you from other sources including public sources, information brokers and third parties such as those described in the 'Disclosure of personal information' section below. For example, we may collect such information from a credit reporting agency or financier in the course of assessing your application for a loan, your employer (to confirm details of your employment position to support your application) or your landlord (to confirm details of your residence and rent payment). Some of the personal information we collect from you is collected to meet our obligations under the National Consumer Credit Protection Act 2009 (Cth) and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

## **2 Disclosure of personal information**

Depending on the circumstances, we may disclose your personal information to AFG; agents, loan managers and related service providers who assist in the management and administration of your loans and loan applications; other service providers including organisations that provide archival, auditing, debt collection, banking, insurance, marketing, advertising, valuation, mailhouse services, authentication, document management, technology and data processing services; government bodies including courts and tribunals; your executor, administrator, trustee, guardian or attorney; your agents, such as financial or legal advisers. We may also disclose personal information to

lenders, prospective funders or other intermediaries in relation to your finance requirements; to anybody who represents you, such as finance brokers, lawyers and accountants; to anyone, where you have provided us consent to do so; to associated businesses that may want to market products to you; to investors, agents or advisers or any entity that has an interest in our business; for any of the purposes for which we may collect, use or disclose information that is set out in this policy.

We may also disclose such information as required or permitted by any law, for example in response to a subpoena or to the Australian Taxation Office, following a direction issued under taxation laws.

Some of the third parties to whom we may disclose personal information may be located in Belgium, Singapore, USA or other countries. We will comply with our obligations under the Privacy Act in relation to these disclosures.

We exchange this credit information for the purposes of arranging and assessing your application for finance and managing that finance.

This credit information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store the credit information we hold about you.

### **3 Links to other websites**

This Website may contain links to other third party websites. You should not assume that any linked website is operated or controlled by us. We are not responsible for the privacy practices of such other sites. We encourage you to read the privacy policies of every website that collects personal information.

### **4 Accessing and correcting your personal information**

To make a request to access or correct any personal information we hold about you, please contact us as set out below. We may need to verify your identity. Please provide as much detail as you can about the particular information you seek, in order to help us locate it. We may charge a reasonable fee for providing access, within legal limits.

We will provide our reasons if we deny any request for access to or correction of personal information. Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

### **5 Information security**

We take care to protect your personal information and employ a range of technical and administrative procedures to protect such information from unauthorised disclosure or loss. We keep personal information in physical and electronic records, both at our own premises and with the assistance of our service providers.

If you are considering sending us any personal information through the Website or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP).

## **6 Credit Reporting**

This section applies in addition to the other sections of this Privacy Policy where you apply for or obtain credit from or through us.

We may collect, hold, use and disclose certain credit-related personal information about you including:

- permitted identification information e.g. names, date of birth, sex, 3 most recent addresses, employer and driver's licence number;
- your applications for credit – the fact that you have applied for credit and the amount and type of credit;
- the identity of your current and previous credit providers;
- records of previous requests made by credit providers to credit reporting bodies ("CRBs") for information about you in connection with consumer or commercial credit applications, guarantees and securitisation arrangements;
- repayment history;
- separate from repayment history, information about defaults (where repayments are more than 60 days overdue, in certain circumstances);
- where those default repayments are no longer overdue, or new payment arrangements have been agreed;
- our or another credit provider's opinion that you have committed a serious credit infringement (that is, acted fraudulently or shown an intention not to comply with your credit obligations);
- the start and end dates, credit limits and certain terms and conditions of your credit arrangements;
- information about court judgments against you;
- publicly available information relevant to your credit worthiness;
- certain insolvency information from the National Personal Insolvency Index;
- information derived by CRBs from the above information (e.g. assessments and ratings in respect of your credit worthiness); and
- information we derive from the above information (e.g. our own assessments and ratings in respect of your credit worthiness),

("Credit related personal information").

This information may include information about your arrangements with other credit providers as well as those with which we are involved. We may disclose some of these types of

information to CRBs, including information about defaults and serious credit infringements. CRBs may use credit-related personal information to maintain records on individuals which they may share with other credit providers for those providers' own credit assessments. The CRBs we may use include:

- Veda, PO Box 964 North Sydney 2059, [www.mycreditfile.com.au](http://www.mycreditfile.com.au), 1300 762 207
- Dun & Bradstreet, Level 7, 479 St. Kilda Road Melbourne 3004, [www.dnb.com.au](http://www.dnb.com.au), [pacaustral@dnb.com.au](mailto:pacaustral@dnb.com.au), 1300 734 806
- Experian, GPO Box 1969, North Sydney NSW 2060, [www.experian.com.au](http://www.experian.com.au), 1300 784 134
- Tasmanian Collection Service, 29 Argyle Street, Hobart, [www.tascol.com.au](http://www.tascol.com.au), [enquiries@tascol.com.au](mailto:enquiries@tascol.com.au), (03) 6213 5555

You can contact those CRBs or visit their websites to see their policies on the management of credit-related personal information, including details of how to access your credit-related personal information they hold. You also have the right to request CRBs not to:

- use or disclose your credit-related personal information, if you have been or are likely to be a victim of fraud; and
- use your credit-related personal information to determine your eligibility to receive direct marketing from credit providers.

## **7 Collection of non-personal information**

- We collect non-personal information about users of the Website, including information on which areas of the Website are most often accessed and how long visitors visit those areas, and other information such as browser type, operating system, to help us manage and improve the Website.
- We store information that we collect through cookies, log files, and/or third party site traffic software to create profiles of users generally.
- Further information is provided below.
- "Cookies" are packets of information that enable our servers to identify and interact more effectively with users' computers. We utilise cookies which enable us to monitor such traffic patterns and to improve users' future experiences of the Website. A cookie does not identify the user personally but it does identify their computer. Users can set their browser to notify them when they receive a cookie and this will provide them with an opportunity to either accept or reject it in each instance. Rejecting cookies may have the effect of limiting access to or functionality of parts of the Website.
- Cookies used may be "session cookies", which terminate once a user closes their browser. We also may use "persistent cookies" which is a small piece of text stored on a user's computer for a defined period of time, after which the cookie is erased.
- In some cases third parties may use cookies and other technologies such as web beacons and JavaScript on the Website in connection with online services like banner advertising,

website analytics and surveys. This may allow them to collect information about your use of our website (including your computer's IP address) which they may store in the United States or other countries. The use of these technologies allows them to deliver customised advertising content, measure the effectiveness of their advertising, evaluate users' use of the Website and other websites and provide other services relating to website activity and internet usage. Those third parties may also transfer the information they collect to others where required to do so by law, or where those others process the information on their behalf. The services we may use from time to time include Google Analytics, Google AdSense, DoubleClick, Yahoo, Adobe and Microsoft. You can find more details in the privacy policies for those services, including information on how to opt-out of certain conduct.

- Like most standard website services we use log files. This includes internal protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyse trends, administer the site, track users' movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personal information.

## 8 Other

- In the event that any part of our business or its assets is ever sold, acquired, merged, liquidated, reorganised or otherwise transferred, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained therein to a third party acquiring the assets. While any transaction of this sort is being considered, we may also make limited relevant personal information available to prospective purchasers and legal and financial advisors and other relevant parties on a confidential basis.

## 9 Changes to this policy

- We reserve the right to make changes to this policy. Such changes will be posted on this website and we will publish the effective date when the statement is updated.
- If you have bookmarked this policy (or the Website) you will need to ensure that the bookmarked version has been updated so that you are aware of the most recent version of this policy.
- Last update: 4 February 2016

## 10 Contacts

- If you have any questions, concerns or feedback about privacy, please contact our Privacy Officer as set out below:
- **Address:** 12a/31-33 Chaplin Drive, Lane Cove NSW 2066  
**Phone:** 02 9424 3700  
**Email:** admin@maccredit.com.au

## 11 Dispute Resolution

- We take your privacy concerns seriously. Where you express any concerns that we have interfered with your privacy, we will respond to let you know who will be handling your matter and when you can expect a further response. We aim to resolve your concerns in a fair and efficient manner. If however you are unsatisfied with our response, you can lodge a dispute with our external dispute resolution scheme, The Credit Investment Ombudsman (“CIO”), which provides a free independent industry dispute resolution service.
- CIO’s contact details are:  
**Phone:** 1800 138 422  
Mail: Credit and Investment Ombudsman Ltd  
PO Box A252  
South Sydney, NSW 1235
- Further contact details and information about the services CIO offers are available from CIO’s website ([www.cio.org.au](http://www.cio.org.au))