



Privacy and Electronic Consent Policy

MediPay's Commitment to Privacy

This Privacy and Electronic Consent Policy sets out how MediPay Holdings Pty Limited ACN 604 221 276 Australian Credit Licence number 474336, MediPay Financial Services Pty Limited ACN 602 847 987 and MediPay Private Pty Ltd ACN 609 043 629 (**MediPay** or **we** or **us**) collect, hold, use and disclose your personal information.

When you provide your personal information to MediPay, we know that you expect us to protect it and keep it safe. This policy sets out how we collect, use, hold, disclose and safeguard your personal information. We are committed to ensuring that at all times your personal information remains private and protected.

When collecting personal information, we are bound by the Privacy Act 1988 (Cth) (Privacy Act), the Privacy (Credit Reporting) Code 2014, the Australian Privacy Principles and any other laws that govern the handling of personal information. We are also bound by laws such as the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the National Consumer Credit Protection Act 2009 (Cth) and any other requirements of regulatory authorities.

We reserve the right to make changes to this policy. You will need to ensure that the version you refer to on our website has been updated so that you are aware of the most recent version of this policy.

Please note that during the course of our relationship with you, we may tell you more about how we handle your personal information. When you receive this further information, please consider it carefully.

What types of your personal information do we collect and hold?

We collect and hold:

1. **Identification Information.** This includes your name, address, contact details and date of birth and is needed to identify you and protect against fraud and unlawful activity.
2. **Financial information.** Information required for making credit-related decisions. For example credit reports from credit reporting bodies, loan repayment history, employment information, bank account information, assets and liabilities information, court proceedings and insolvency information.
3. **Sensitive Information.** We may collect sensitive information, which includes health information and information about your religion, racial or ethnic origin, political opinions, criminal record and sexual orientation.

How do we collect your personal information?

We collect your personal information:

1. **Directly from you.** This occurs when you complete our online loan application and when you talk to us in person or on the phone. We may record your interactions with us, including your telephone conversations with us and your use of our emails and website.

2. **Electronically.** This occurs through electronic records created when you use our website, tablet or mobile applications. For example information about your location or activity including the date of and time of visits, which pages are viewed, how you as the user navigate through the website and interact with the webpages (including fields completed in form and applications), IP address, telephone number, information about the device used to visit our website and whether you've accessed third party sites.
3. **Third party service providers.** We collect information about you from third parties such as credit agencies, accountants, financial institutions, landlords, agents, advisers, brokers and/or employers.
4. **Public information.** We may also collect information about you that is publicly available, for example from public registers or social media.

How do we hold personal information?

Much of the information we hold about you will be stored electronically in cloud or other types of networked or electronic storage centres. Some information we hold about you will be stored in paper files. 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).

How do we use personal information?

We collect, use and exchange your information so that we can

1. establish your identity and assess applications for products and services;
2. price and design our products and services;
3. administer our products and services;
4. manage our relationship with you;
5. manage our risks and help identify and investigate illegal activity, such as fraud
6. contact you, for example if we suspect fraud on our account or need to tell you something important;
7. conduct and improve our businesses and improve the customer experience;
8. comply with our legal obligations and assist government and law enforcement agencies or regulators, and
9. identify and tell you about other products or services that we think may be of interest to you.

We may also collect, use and exchange your information in other ways where permitted by law.

Who do we exchange your information with?

We may disclose certain credit-related personal information with credit reporting bodies (CRB's). We do this when you apply for credit as we need to know if you're able to meet repayments under your agreement with us. We also want to avoid giving you further credit if this would put you in financial difficulty. One of our checks involves obtaining a credit report about you.

We use information from credit reporting bodies to confirm your identity, assess applications for credit, manage our relationship with you and collect overdue payments. We may also use this information as part of arriving at our own internal assessment of your creditworthiness.

The CRB's we may use include Veda (www.mycreditfile.com.au), Dun & Bradstreet (www.dnb.com.au) and Experian (www.experian.com.au). You can contact those CRB's 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.

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

- permitted identification information e.g. names, date of birth, gender, most recent addresses, employer, passport and driver's licence details;
- 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 for information about you in connection with consumer or commercial credit applications;
- 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 CRB's 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).

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

We may also disclose such information as required by the Privacy Act or any other law.

We store credit-related information with your other information. You can access credit-related information we hold about you, request us to correct the information and make a complaint to us about your credit-related information.

Do we use personal information for marketing?

We will use your personal information to offer you products and services we believe may interest you. These products and services may be offered by MediPay or one of its preferred suppliers. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising. 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.

Can you get access to and correct your information?

You can request access to the personal information we hold about you, and ask for corrections to be made, by contacting us using the contact details set out in this Privacy and Electronic Consent Policy. Please provide as much detail as you can about the particular information you seek, in order to help us locate it.

Is there a fee?

You will not be charged any fees to access your credit-related information if you have not made a request for accessing the information within the preceding 12 months. If you have made an access request within the preceding 12 months, a reasonable cost may be charged.

Can we deny or limit your request for access?

We are not required to provide you access if we are unable to identify you and in certain circumstances we're allowed to deny your request, or limit the access we provide. For example we might not provide you access to commercially sensitive information. Whatever the outcome, we will communicate our decision to you.

Do we transfer your information overseas?

We may disclose your personal information to overseas recipients in order to provide our services and for administrative, data storage or other business management purposes. The countries to which this information may be disclosed include the United States of America, Canada, United Kingdom and countries within the European Union, Philippines, Singapore and New Zealand.

Electronic Communications

1. We receive and send documents electronically and sign documents electronically.
2. We may make all notices and other documents available for a reasonable period of time on a password protected section of our website for retrieval by you or we will send you notices and other documents by email and SMS.
3. If the information is displayed on our website we will promptly send you an email to the email address nominated notifying you that information is available for retrieval on our website and notify you of the nature of that information;
4. we will not send paper copies of notices and other documents;
5. you should regularly check your nominated email address for notices; and
6. You should have facilities to enable you to readily print notices or other documents retrieved from our website or sent to you by email if you desire.

Contact us about our privacy and information handling practices

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Privacy Act, please contact our privacy officer at:

e-mail: care@medipay.com.au

Tel: 1800 810 950

Postal: Suite 3, Level 1, 53 Cross Street Double Bay NSW 2028

Where you express any concerns that we have interfered with your privacy, we will respond to let you know 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 Australian Financial Complaints Authority, or AFCA.

AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

Last updated: 18 March 2018