



## Capitalcorp Client Privacy Principles

### **Our commitment to your right to Privacy...**

At Capitalcorp Financial Services we are serious about protecting our clients privacy. When you appoint us as your agent to arrange finance and insurance facilities we are committed to the highest standards of managing personal information. We will adhere to all applicable Government regulations, the basic Principles detailed below, and to the Capitalcorp Privacy Policy.

1. We will collect only the personal information necessary to provide services, administer those services, and to promote our products to our clients and any individuals whose personal information is collected.
2. We will tell the individuals why we are collecting their personal information and what we will need to do with it, to provide the finance and insurance facilities we are arranging on their behalf.
3. Where required by the National Privacy Principles, we will collect information directly from the individuals with whom we deal. Where we need to collect information from other sources we will tell our clients that we are doing this, and why it is necessary.
4. We will make all reasonable efforts to ensure that personal information is stored securely, protected against misuse or unauthorised access. We will provide ready access to all individuals who wish to correct or update their personal information held by us and, where required by the National Privacy Principles, will provide access to an individual in relation to their personal information.
5. The Capitalcorp Privacy Policy will be freely available to clients and prospective clients through any Capitalcorp branch, and our websites.

Jack Bradford  
General Manager  
Capitalcorp Finance & Leasing Pty Ltd



## **Capitalcorp Financial Services ("Capitalcorp") Privacy Policy**

At Capitalcorp we want you to be confident that the personal information you provide to us is treated with the highest degree of integrity and privacy.

However it is equally important to us that we provide the best possible service across our wide range of financial products and services. To achieve this aim we need to make the most efficient use of your personal information.

### **Who is Capitalcorp?**

Capitalcorp is one of the largest personal and commercial finance facilitators in Australia. We operate branches in all Australian states and territories and offer a wide range of finance and insurance products.

- The Capitalcorp group Parent Company is Capitalcorp Finance & Leasing Pty Ltd, and Capitalcorp Financial Services is a registered business name of the company.

### **What is “personal information”?**

Personal information is any information about you that identifies you or by which your identity can be reasonably determined.

### **Why we collect your personal information?**

Collecting your personal information is essential for Capitalcorp to be able to conduct its business of arranging and/or providing financial products and services on behalf of its customers. The information we collect, either from you directly, or about you from other sources is necessary to enable us to prepare an application on your behalf.

If we do not collect this information we may not be able to fully assess your requirements and facilitate the most appropriate product/s for your particular purpose.

By collecting personal information, we

- Set up and administer products and services
- Determine your requirements and apply, on your behalf, for the appropriate product or service
- Improve our financial products and services
- Identify you and protect you from unauthorised access to your personal information, account or services.

## **How do we collect your personal information?**

Where possible we collect your personal information directly from you.

Collection may take place in a number of ways, such as when you complete an application form for a product or request a product or service over the telephone or internet.

Often personal information is collected during the course of our relationship with you. An example of personal information collection may be when you contact us to discuss your existing loans and/or insurances.

Sometimes personal information may be collected about you from other sources. Examples of where we may receive your personal information from another source and why this would happen are:

- Credit information or payment history we obtain about you from a credit reporting agency or a financier in the course of preparing an application for a loan on your behalf.
- Your employer, in the course of confirming your employment details to support your application.
- Your landlord, in the course of confirming your residence and rent payments to support your application.
- A motor dealer who provides initial information to us about you so we can commence preparing a finance and/or insurance application on your behalf.

In most cases we will require you to specifically consent to any collection, use or disclosure of your personal information by Capitalcorp. Your consent will usually be required in writing but we may accept your verbal or implied consent in certain circumstances.

However, no matter how your personal information is collected it is dealt with by Capitalcorp in accordance with this Privacy Policy.

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

We use the personal information that we collect so that we can conduct our business of facilitating and/or providing financial products and services and to administer and enhance the financial service relationship we have with you.

We may also share the information with other companies in the Capitalcorp group.

## **Direct Marketing?**

From time to time we may use your personal information to provide you with information about our extensive range of financial products and services. Our contact with you will usually be by mail, telephone or email.

If you do not want to receive any of this information just contact us at any one of our branches or by calling 1300 367 937. Once you have told us you no longer wish to receive information about our products and services, we will not send you any further material, unless we are required by law to send such information to you.

You can, however, change your mind about receiving information about our products and services at any time – either way, you just need to let us know.

Capitalcorp does not disclose your personal information to a party outside Capitalcorp for the purposes of allowing them to direct market their products or services to you, unless you have specifically agreed to our doing so.

We will not call personally at your residence or place of work unless you specifically agree to this and we arrange an appointment beforehand.

### **Do we disclose your personal information to anyone?**

To arrange the requested financial and insurance facilities we need to pass the personal information we collect to Credit Providers and Insurers whom we approach on your behalf seeking credit and insurance for you.

To be able to provide your application to the Credit Providers and Insurers we may also need to disclose the information (or part of it) to:

- Credit Reporting Agencies and any current and past credit providers - for the purpose of obtaining details of your current and past credit payment history
- Your referees, employers, landlords etc - for the purposes of identifying you correctly when we seek confirmations from them regarding the details you have provided to us.
- Mail service providers - for the mailing of documents, correspondence and Capitalcorp direct marketing material etc.
- Guarantor/s offered on loan applications - for the purpose of allowing them to fully understand the risks they may be taking.

Capitalcorp may also disclose your personal information to others in certain circumstances. For example:

- If we are required or authorised by law to disclose your personal information. For example to a Court in response to a subpoena or to the Australian Taxation Office following a direction issued under taxation laws.
- We may also disclose your personal information to other parties, but only where you have consented to us doing so. Your consent to the disclosure of your personal information may be given explicitly such as in writing or verbally, or may be implied from your conduct such as when you discuss details of the relationship you have with us publicly with the media.
- Where a Capitalcorp contracted entity is dealing with you then we may need to pass information back to the entity in the course of assessing your application. Each contractor is bound to comply with the provisions of this policy.

### **How do Credit Providers and Insurers deal with the information we give them?**

Prior to actually entering into the finance agreement or insurance policy, you will be asked to give your written consent to allow those organisations to use your personal information. They will provide full detail of how they intend to use and store the information at that time.

## **Ensuring your personal information is up-to-date?**

We rely on the personal information we hold about you to efficiently conduct our business of providing or arranging financial products and services.

For this reason, it is very important that the personal information we collect from you is accurate, complete and up-to-date.

During the course of our relationship with you we may ask you to tell us of any changes to your personal information, however you can contact us at any time to update your personal information or to tell us that the information we hold about you is inaccurate or incomplete.

## **Is my personal information secure?**

The protection of your personal information is a priority for Capitalcorp.

This is why we take all reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure.

We employ a number of means to protect your personal information including:

- Appropriate premises security
- Entering into confidentiality agreements with all employees, contractors and third party organisations
- Password protecting our computer based information to prevent unauthorised computer access
- Providing appropriate protection against "hackers" within our computer systems
- Securely destroying and/or deleting any personal information that is no longer required from our systems
- Requiring any contractors to Capitalcorp adopt the same levels of security as ourselves.

## **Can I access the personal information Capitalcorp holds about me?**

You may request access to any of the personal information we hold about you.

In most cases, details of the personal information we hold about you is freely available by calling 1300 367 937, or visiting us at one of our branches.

If the information you seek is not readily available, for example, archived data, then we will endeavour to provide this to you within 30 days of your request. We reserve the right to charge you a fee for this retrieval.

Capitalcorp may be required by law or by good business practice to retain your personal information for a period of time after you have ceased your relationship with us. After the required time has passed we attend to the secure destruction or deletion of your personal information.

## **Can my request for access to my personal information be denied?**

Capitalcorp is not always required to provide you with access to your personal information upon your request.

We may refuse you access to personal information in a number of circumstances, such as where the information may relate to existing or anticipated legal proceedings with you, where denying access is required or authorised by law, or where the request for access is regarded as frivolous or vexatious.

If we deny your request for access to, or refuse your request to correct your personal information, we will explain why.

### **Do I have to be identified?**

Generally it is not possible for us to do business with you unless we have identified you. This is necessary as standard business practice and also protects you against someone using your name fraudulently to obtain finance or insurance. We will usually ask you for photographic evidence such as a drivers licence or passport. We may also need to carry out a “100 point check” to verify your identity and any information obtained in this activity will be maintained securely in conjunction with any other Personal Information you provide.

We will not use a Tax File Number and if this is provided in any information you give us we will not record it in our files and will remove any reference to it from documents you provide to us.

Wherever it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously, if you request it. For example, when making an enquiry about current interest rates applicable or the type of products or services we offer.

### **Does my personal information leave Australia?**

Capitalcorp does not send personal information outside Australia unless it is authorised to do so by law.

### **Does Capitalcorp collect “Sensitive Information”?**

If personal information concerns particular topics it is regarded as sensitive information.

Sensitive information can be information about your:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Religious beliefs or affiliations
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual preferences or practices
- Criminal record
- Health

Capitalcorp generally has very limited need to obtain such information, however may require some information such as criminal record or health to arrange certain insurance facilities. If such information is needed then it will only be obtained and/or used with specific consent from you. If, in the course of arranging your application or facilities, such information does come into our possession from a third party, we will

seek your consent to collect, store and use this should we consider such use necessary in your application.

### **Access to our services via the Internet**

As much of Capitalcorp business emanates from referrals through our websites, we ensure that any personal information we get online from customers or prospective customers is treated with the same level of care as if it was received via personal contact. Our policies provide:

- If you make a general email enquiry (usually this involves providing only your name, contact details and type of facility required), we will always ask you for your written consent before we commence any actual application activity on your behalf.
- If you make a full online application, your details will be encrypted via our web technology to provide high level protection from unauthorised access to your personal information. We will also ensure that we hold your written consent before commencing any application activity.
- Our Privacy Policy will be available for viewing on our websites.

### **Our Privacy Policy may change for time to time**

Capitalcorp constantly reviews all its policies and procedures to keep up to date with changes in the law, technology and market practice.

As a result we may change this privacy policy from time to time.

This Privacy Policy was last amended on March 8, 2005 and is labelled "Version 2".

### **Concerns or requests for access?**

If you have a question about this Privacy Policy or wish to lodge a request to access your personal information you can contact us in any of the following ways:

- |                |   |                                                                                              |
|----------------|---|----------------------------------------------------------------------------------------------|
| By Visiting    | ⇒ | Any one of our branches                                                                      |
| By Telephoning | ⇒ | 1300 367 937                                                                                 |
| By Writing to  | ⇒ | Capitalcorp Financial Services<br>Compliance Manager<br>PO 6567<br>Upper Mt Gravatt Qld 4122 |

If you believe that Capitalcorp has not protected your personal information as set out in this privacy policy you may lodge a complaint with us in any of the following ways:

- |                |   |                                                                                                      |
|----------------|---|------------------------------------------------------------------------------------------------------|
| By Telephoning | ⇒ | 07 3112 2222                                                                                         |
| By Writing to  | ⇒ | Capitalcorp Financial Services<br>General Manager Operations<br>PO 6567<br>Upper Mt Gravatt Qld 4122 |

### **What if I am not satisfied with Capitalcorp's response?**

If you are not satisfied with the result of your complaint to Capitalcorp, you can refer your complaint to the Federal Privacy Commissioner.

You can contact the Federal Privacy Commissioner:

By Telephone



1300 363 992

By Writing to



Director of Complaints  
Office of the Federal Privacy Commissioner  
GPO Box 5218  
Sydney NSW 1042