Privacy Policy

Privacy Commitment, respecting your privacy

This Privacy Policy is relevant to TL & Co Finance Brokers Pty Ltd

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information that you may provide to us.

Our Privacy Policy ensures your right to privacy as we recognise that any personal information we may collect about you will only be used for the purposes indicated in our policy. It is important to us that you are confident that any personal information we collect from you or is received by us, will be treated with appropriate respect ensuring protection of your personal information.

If you are in a country that is a member of the European Economic Area (EEA), the EU General Data Protection Regulation 2016/679 (GDPR) governs the way we collect, use, hold, process and disclose your personal information. Under GDPR, we are a data controller. We make decisions on how and why your personal information is processed.

This Policy also includes our credit reporting policy, that is, it covers additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information below as **credit information**.

TL & Co Finance Brokers is committed to complying with the Privacy Act 1988 (Cth), the Australian Privacy Principles and any other relevant laws when handling your personal information. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au.

Who is TL & Co Finance Brokers?

We help individuals, families, and investors find the right home loan to suit their needs and financial goals.
My services include:

- Home Loans: Assistance with purchasing your first home or your next property.
- Refinancing: Reviewing your existing home loan to see if you could secure a better rate or more suitable loan features.
- Investment Loans: Helping property investors explore financing options to grow their portfolios.
- Loan Comparisons: Comparing loan options from a range of lenders to find a suitable solution.
- First Home Buyer Support: Guiding first-home buyers through the lending process and explaining available grants and government schemes.
- Pre-Approvals: Helping clients understand their borrowing capacity and prepare for purchasing a property.
- Personalised Guidance: Managing the application process, liaising with lenders, and keeping clients informed from application through to settlement.
- Our goal is to make the home loan process simple, transparent, and stress-free by providing personalised advice and support every step of the way.

You appoint us as your Agent (Access Seeker) to obtain your credit information from a credit information from a credit reporting body on your behalf and for the purpose of assisting you with your finance application. You authorise us to disclose any credit information we obtain to prospective financiers in connection with your finance application.

By providing personal information to us, you consent to the collection, use and disclosure of your information in accordance with this Policy and any other arrangements that apply between us.

What personal information do we collect and hold?

General information

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- Loan account numbers and loan account balances;
- other contact details such as social media handles; and
- other information we think is necessary relating to the services we provide.

Over the course of our relationship with you, we may collect and hold additional personal information about you, including transactional information, complaint or enquiries about products or services.

When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws which require us to collect personal information. For example, we require personal information to verify your identity under Australian Anti-Money Laundering law.

What do we collect via your website activity?

If you're an internet customer of ours, we monitor your use of internet services to ensure we can verify you and can receive information from us, and to identify ways we can improve our services for you.

If you start but don't submit an on-line application, we can contact you using any of the contact details you've supplied to offer help completing it. The information in applications will be kept temporarily then destroyed if the application is not completed.

We also know that some customers like to engage with us through social media channels. We may collect information about you when you interact with us through these channels. However, for all confidential matters, we'll ensure we interact with you via a secure forum.

To improve our services and products, we sometimes collect de-identified information from web users. That information could include IP addresses or geographical information to ensure your use of our web applications is secure.

We also collect de-identified information if you use one of our calculators or other programs. Although the information collected does not identify an individual, it does provide us with useful statistics so that we can analyse and improve our online services.

We also collect de-identified information from the online interactions of users who are not customers that use our web services. Much of this data collection is done through the use of cookies and used to improve our services and enhance users web experience with us e.g. website statistics and does not identify individual customers but does identify internet browser. Where we do identify you (such as where customers are supplying us with information), we treat any use or disclosure in accordance with this policy.

How do we collect your personal information?

How we collect and hold your information

Unless it's unreasonable or impracticable, we will try to collect personal information directly from you (referred to as '**solicited information**'). For this reason, it's important that you help us to do this and keep your contact details up-to-date.

There are a number of ways in which we may seek information from you. We might collect your information when you fill out a form with us, when you've given us a call or used our website. We also find using electronic means, such as email or SMS, a convenient way to communicate with you and to verify your details[1].

How we collect your information from other sources

Sometimes, we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- we collect information from third parties about the loan or lease made available to you arising out of the services we provide you;
- we can't get hold of you and we rely on public information to update your contact details; or
- we exchange information with your legal or financial advisers or other representatives.

What if you don't want to provide us with your personal information?

If you don't provide your information to us, it may not be possible:

- for us to give you the credit assistance you seek from us;
- to assist in finding a loan or lease relevant to your circumstances;
- verify your identity or protect against fraud; or
- to let you know about other products or services that might be suitable for your financial needs.

How we collect and hold your credit information

We will collect your credit information in the course of you answering the enquiries we make of you relating to the credit assistance you seek from us. In addition to what we say above about collecting information from other sources, other main sources for collecting credit information are:

- your co-loan applicants or co-borrowers;
- your guarantors/proposed guarantors;
- your employer, accountant, real estate agent or other referees;
- your agents and other representatives like the person who referred your business to us, your solicitors, conveyancers and settlement agents;
- organisations that help us to process credit applications;
- organisations that check the security you are offering such as valuers;
- bodies that issue identification documents to help us check your identity; and
- our service providers involved in helping us to process any application you make for credit through us.

What do we do when we get information we didn't ask for?

Sometimes, people share information with us we haven't sought out (referred to as 'unsolicited information'). Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

When will we notify you that we have received your information?

When we receive personal information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

How do we take care of your personal information?

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- document storage security policies;
- security measures for access to our systems; and
- only giving access to personal information to a person who is verified to be able to receive that information.

We may store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

What happens when we no longer need your information?

We'll only keep your information for as long as we require it for our purposes. We may be required to keep some of your information for certain periods of time under law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

Sensitive Information

Sensitive information is any information about a person's racial or ethnic origin, 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 or health information.

We will not ask you to disclose sensitive information, but if you elect to provide sensitive information it will be captured and stored.

How we use your personal information

What are the main reasons we collect, hold and use your information?

Collecting your personal information allows us to provide you with the products and services you've asked for. This means we can use your information to:

- give you credit assistance;
- give you information about loan products or related services;
- consider whether you are eligible for a loan or lease or any related service you requested;
- assist you to prepare an application for a lease or a loan;
- administer services we provide, for example, to answer requests or deal with complaints; and
- administer payments we receive, or any payments we make, relating to your loan or lease.

Can we use your information for marketing our products and services?
We may use or disclose your personal information to let you know about other products or services we or a third party make available and that may be of interest to you.

We will always let you know that you can opt-out from receiving marketing offers.

With your consent, we may disclose your personal information to third parties for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organisation.

Yes, You Can Opt-Out
You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will process your request as soon as practicable.

What are the other ways we use your information?
We've just told you some of the main reasons why we collect your information, so here's some more insight into the ways we use your personal information including:

- identifying you;
- telling you about other products or services we make available and that may be of interest to you, unless you tell us not to;
- allowing us to run our business efficiently and perform general administrative tasks;
- preventing any fraud or crime or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- any purpose to which you have consented.

What are the grounds on which we deal with your personal information under the GDPR

Under the GDPR, we must have legal grounds in order to process your personal information. The legal grounds that we may rely on are:

- Compliance with a legal obligation;
- Where you have provided your consent; and
- For our legitimate interests, our main legitimate interests for processing your personal information are: fraud, security, due diligence, business operations and direct marketing.

Who do we share your personal information with

To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others. We may share your information with other organisations for any purposes for which we use your information.

Sharing Your Information
We may use and share your information with other organisations for any purpose described above.

<u>Sharing with your representatives and referees</u>
We may share your information with:

- your representative or any person acting on your behalf (for example, lawyers, settlement agents, accountants or real estate agents); and
- your referees, like your employer, to confirm details about you.

<u>Sharing with third parties</u>
We may share your information with third parties in relation to services we provide to you. Those third parties may include:

- the mortgage aggregator and asset finance aggregators through whom we may submit loan or lease applications to lenders or lessors on our licensee's panel;
- referrers that referred your business to us;
- valuers;
- lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries;
- organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;
- government or regulatory bodies (including ASIC and the Australian Tax Office) as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- guarantors and prospective guarantors of your loan or lease;
- service providers, agents, contractors and advisers that assist us to conduct our business;

- any organisation that wishes to take an interest in our business or assets; and
- any third party to which you consent to us sharing your information.

We receive services to support the broking services we provide you. We receive mortgage aggregation and asset finance aggregation services from several aggregators, these include:

- National Lending Group (the holder of an Australian Credit Licence and who we are authorised under);
- Choice Aggregation Services/Loan Market Group;

Sometimes they collect personal information about customers to manage customer enquiries or complaints, commissions payment or file reviews

If you want to find out about how they manage your personal information, please visit their respective websites at the addresses detailed below:

https://www.nlg.com.au/privacy-policy
https://www.lmg.broker/privacy-policy

Sharing outside of Australia

Some of the recipients to whom we disclose your personal information may be based overseas, including India and the Philippines. Where we may be transferring personal information overseas, we will either inform you and seek your consent to the arrangement or ensure that appropriate contractual measures are in place to ensure that the overseas entity protects the personal information to the same level as required by National Lending Group Pty Ltd under the Privacy Act.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Where we transfer your information from the EEA to a recipient outside the EEA we will ensure that an adequate level of protection is in place to protect your personal information such as putting in place contractual protections to ensure the security of your information.

Cookies

We may collect personal information about you through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which area of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

How do you access your personal information?

How you can generally access your information

We'll always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us in writing to access your personal information that we hold. In some cases we may be able to deal with your request over the phone.

We will give you access to your information in the form you want it where it's reasonable and practical. We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first.

We're not always required to give you access to your personal information. Some of the situations where we don't have to give you access include when:

- we believe there is a threat to life or public safety;
- there is an unreasonable impact on other individuals;
- the request is frivolous;
- the information wouldn't be ordinarily accessible because of legal proceedings;

- it would prejudice negotiations with you;
- it would be unlawful;
- it would jeopardise taking action against serious misconduct by you;
- it would be likely to harm the activities of an enforcement body (e.g. the police); or
- it would harm the confidentiality of our commercial information.

If we can't provide your information in the way you've requested, we will tell you why in writing. If you have concerns, you can complain. See 'Contact Us'.

What happens if there is a Data Breach?

In the unlikely event that we suspect that there has been a data breach that may cause you serious harm, we will take all reasonable steps to assess if your data has been accessed or lost, and if this information being accessed or lost may cause you serious harm. This assessment will always be completed expeditiously and within 30 days.

If we find that there has been a data breach that has the potential to cause you serious harm, this will be reported to the Office of the Information Commissioner and you directly.

How do you correct your personal information?

How we correct your information

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's:

- inaccurate;
- out-of-date;
- incomplete;
- irrelevant; or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

What additional things do we have to do to correct your credit information?

If you ask us to correct credit information, we will help you with this in the following way.

Helping you manage corrections

Whether we made the mistake or someone else made it, we are required to help you ask for the information to be corrected. So we can do this, we might need to talk to others. However, the most efficient way for you to make a correction request is to send it to the organisation which made the mistake.

Where we correct information

If we're able to correct the information, we'll let you know within five business days of deciding to do this. We'll also let the relevant third parties know as well as any others you tell us about. If there are any instances where we can't do this, then we'll let you know in writing.

Where we can't correct information

If we're unable to correct your information, we'll explain why in writing within five business days of making this decision. If you have any concerns, you can access our external dispute resolution scheme or make a complaint to the Office of the Australian Information Commissioner.

Time frame for correcting information

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that's been agreed by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter;
- ask you to agree in writing to give us more time; and
- let you know you can complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

How do you make a complaint?

How do you generally make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to

contact us.

You can contact us by using the details below:
Trong Le - Director
TL & Co Finance Brokers Pty Ltd
Phone: 0404 733 521
Email: Trong.le@tlcofinance.au

We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days.

Need more help?
If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:
Online: www.oaic.gov.au/privacy
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Fax: +61 2 9284 9666
Mail: GPO Box 5218 Sydney NSW 2001 or GPO Box 2999 Canberra ACT 2601

If you are located in the EEA, you can contact the relevant data protection authority (for example in the place you reside in or where you believe we breached your rights). For example, the Office of the UK Information Commissioner:
Office of the UK Information Commissioner
Online: ico.org.uk
Phone: 0303 123 1113
Live chat: https://ico.org.uk/global/contact-us/live-chat

What additional things do we have to do to manage your complaints about credit information?

If your complaint relates to how we handled your access and correction requests
You may take your complaint directly to our external dispute resolution scheme or the Office of the Australian Information Commissioner. You are not required to let us try to fix it first.

For all other complaints relating to credit information
If you make a complaint about things (other than an access request or correction request) in relation to your credit information, we will let you know how we will deal with it within seven days.

Ask for more time if we can't fix things in 30 days
If we can't fix things within 30 days, we'll let you know why and how long we think it will take. We will also ask you for an extension of time to fix the matter. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Letting you know about our decision
We'll let you know about our decision within 30 days or any longer agreed time frame. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Your Rights under GDPR

If you reside in the EEA, you can also:

- object to the processing of your personal information or ask us to delete, or restrict or stop using your personal information. There may be circumstances where we are required to, or entitled to retain or continue using your information.
- Withdraw your consent to our processing of your information. We may continue to process our information if we have another legitimate ground to do so;
- Ask us to send an electronic copy of your personal information, including to another organisation.

You can contact us if you wish to exercise these rights. See "Contact Us" for more information. If we refuse any request you make in relation to these rights, we will write to you to explain why and how you can make a complaint about our decision.

Contact Us

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures.

We welcome your feedback.

You can contact us by using the details below:
Trong Le
Address: 14 Tiber Crest, Springfiled QLD 4300
Contact: 0404 733 521
Email: Trong.le@tlcofinance.au

What if you want to interact with us anonymously or use a pseudonym?

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way, however, as we are often governed by regulations that require us to know who we're dealing with. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable; or
- we are required or authorised by law or a court/tribunal order to deal with you personally.

What do we do with government-related identifiers?

In certain circumstances we may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.

Changes to this Privacy Policy

This Policy may change. We will let you know of any changes to this Policy by email. Should you require a copy of our Privacy Policy please specify the manner in which you would like to receive it and a copy will be sent to you.

Updated Aug, 2022

[1] However we'll never ask you for your security details in this way – if you are ever unsure, just contact us