



SCM Finance Solutions Privacy Policy

28 MAY 2020

Who are we?

LM Broker Services Pty Ltd* and its related bodies corporates ('We', 'us' and 'our') recognise the importance of protecting the privacy of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

*LM Broker Services means a LM Broker Services appointed credit representative and its' authorised Loan Writers operating a LM Broker Services member business in accordance with this website. Unless otherwise expressly stated, it does not include LM Broker Services Pty Ltd.

Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it 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 protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the

protection of personal information, as set out in the Privacy Act and any other relevant law.

Personal information

When we refer to **personal information**, we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also include credit information.

Credit information is information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

The kinds of personal information we may collect about you include your name, date of birth, address, contact details, account details, occupation, and any other information we made need to identify you.

If you submit inquiries or information using our website, we may also collect the type of finance and the amount of finance that you are interested in obtaining, and any information that you provide to us directly through our website or indirectly through use of our website.

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. If you apply for any insurance product through us, we may also collect your health information. We will only collect health information from you with your consent.

Why we collect your personal information

We collect personal information for the purposes of assessing your application for finance and managing that finance. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

We collect personal information on our website to send communications requested by you and to answer enquiries and provide information or advice to you.

To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organisations that provide products or services used or marketed by us. We may also disclose your personal information to any other organisation that may have or is considering having an interest in your finance, or in our business.

How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. For example, we collect your personal information directly from your use of our website and the information that you submit to the website. We also collect your personal information if you use the "contact us" functionality on our website and you provide the personal information during conversations between you and our representatives.

We may also collect your personal information from LM Broker Services, other finance brokers and other people such as accountants and lawyers.

Do we disclose your personal information?

We may disclose your personal information:

- to our employees, LM Broker Services, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- to prospective funders or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance such as third-party suppliers, printing and postal services, call centres;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as finance brokers, lawyers and accountants;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Courter Terrorism Financing Act 2006 (Cth)*;
- to investors, agents or advisers, or any entity that has an interest in our business; or
- to your employer, referees or identity verification services.

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

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

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to our LM Broker Services' related bodies corporate, our related bodies corporate and third-party suppliers and service



providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- our data hosting and other IT service providers, located in various countries; and
- other third parties located in various foreign countries, including Philippines & USA.

Your personal information may be stored in the cloud in an overseas country.

In the event that a disclosure is made in an overseas country (which we consider unlikely), the information will not be protected by the Australian Privacy Principles. In any event, by providing your details, you consent to your information being disclosed in this manner.

Direct marketing

From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us, LM Broker Services 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 contacting us (see the details below) or by using the unsubscribe function in the marketing communications. 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.

We may provide your personal information to LM Broker Services and related bodies corporate for the purposes of direct marketing.

Our Website

Cookies and IP addresses

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 each time you visit our

website. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited, to measure transaction patterns, to analyse trends, administer the website, track users' movements and gather broad demographic information. We use this to research our users' habits so that we can improve our website and our service offering. Our cookies may record information such as your Internet Protocol (IP) address (that is, the electronic addresses of computers connected to the internet), your device and browser type, operating system, the pages or features of our site to which you have browsed and the time spent on those pages or features, the frequency with which the site is used by you, the search terms that you have used, the links on our site that you have clicked on or used, and other usage statistics.

While our cookies do not collect personal information per se, if you submit your name and email address as part of your usage, then we will link that personal information with the cookies information that we have previously collected from you.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

Security

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Links and third-party advertisements

Our website may contain links to other websites operated by third parties. Our website may also display advertisements, which are hosted by third parties.

We make no representations or warranties in relation to the privacy practices of any third-party website or advertisement providers and we are not responsible for the privacy policies or the content of any third-party website or advertisements. Third party websites are responsible for informing you about their own privacy practices.



Our online advertising network partner may use cookies, web beacons or other web tracking techniques to collect non-personally identifiable information about your activities on the website and other websites that you may visit to provide you targeted advertising based upon your interests.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

Access and correction to your personal information

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time.

We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

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

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information. At the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

We may need to consult with other entities as part of our investigation.

If we refuse to correct personal information, we will provide you with our reasons for not correcting the information.

Using government identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, 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 interest rates or current promotional offers.

You may choose to interact with our website anonymously, but we will not be able to invite our participating finance brokers to contact you unless you provide your personal information.

Sensitive information

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

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

We will take reasonable steps to protect your personal information by storing it 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. For example, personal information that you submit on our website are stored in electronic systems that have access controls in place.



Complaints

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact us via the contact link on our website.

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either www.oaic.gov.au or 1300 363 992.

Further information

You may request further information about the way we manage your personal information by contacting us.

Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and marketplace practices.

As a consequence, we may change this privacy policy from time to time or as the need arises.

You may request this privacy policy in an alternative form.

SCM Finance Solutions Pty Ltd ATF The SCM Finance Solutions Trust (AH) is a Corporate Credit Representative (CR No. 479471) of LM Broker Services Pty Ltd ACN 632 405 504 Australian Credit Licence 517192.

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