Strategic Pathway Finance Pty Ltd ABN 56692701509 is bound by the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). Should you have any queries about the privacy of your personal information or the below Privacy Policy, please contact our Privacy Officer by email at scott@strategicpf.com.au or telephone 0429 432 600.

Privacy Policy

This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.
This Privacy Policy explains how we manage your personal information. Under the Privacy Act, 'personal information' is generally any information or opinion that identifies you personally.
We may make changes to this Privacy Policy from time to time. If we do, we will post the updated version on our website or notify you in writing.
When you provide data and information to us, you are consenting to our collection, use, processing and disclosure of that information in accordance with the provisions of this privacy policy and you authorise us to handle and use your data and information as described in this privacy policy.
If you do not provide us with the information, we request from you we will not be able to provide the services to you that you have sought from us.

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 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, account details, occupation, and any other information we made need to identify you.
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.

Collection

We collect information from you:

- to enable us to provide services to you
- to verify and authenticate your identity
- to assess your application for finance and managing that finance

- to manage, administer and control the quality of the services that we provide to you
- to comply with our legal obligations.
- to market directly to you and manage our relationship with you; and to enable banks and financial institutions to market their products and services to you.

Unfortunately, if we cannot collect your personal information we may be unable to complete or process your financing application.

How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. There may be some occasions where we will need to source information about you from a third party. For example, we may collect personal information from (but not limited to) a credit reporting agency or a government agency.
We take reasonable precautions to protect the personal information we hold from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

We may use third party data storage providers to store personal information electronically. We take reasonable steps to ensure this information is held as securely as information stored on our own equipment.

Do we disclose your personal information?

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. The disclosure of your information to third parties is core to our function and activities. We may also disclose your personal information to those of our affiliates and related companies that agree to treat it substantially in accordance with this privacy policy.
Examples of types of third parties we may disclose your personal information to include:

(a) Service providers

We disclose personal information to external service providers that assist us to:

- provide, manage and administer products and services and business systems (including IT technicians); prospective funders or other intermediaries in relation to your finance requirements; other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres – you acknowledge that due to our use of cloud computing services and software as a service that your data may be transferred outside of Australia but within the control of our third party providers.

- securely manage processing of credit card payments and storage of credit card details; and
- analyse trends and aggregated demographic information and target your interests.

(b) Regulators

We may disclose your personal information to:

- regulators and law enforcement agencies; or
- respond to an enquiry from a government agency under State or Federal laws; or
- where we are required to do so by law, such as under the Anti-Money or Laundering and Courter Terrorism Financing Act 2006 (Cth);

(c) Marketing

We may also use and disclose your personal information to:

- (i) let you know about our new products and services or other opportunities;
- (ii) send you product and service information on behalf of third parties;
- (iii) enable banks and financial institutions to market their products and services to you.

Each time we send you a marketing communication, you will have the option of opting-out from future marketing communications.

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

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

Marketing directly to you

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 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:

- telephoning us on 0429432600 or
- by writing to us at scott@strategicpf.com.au

If the direct marketing is by email you may also use the unsubscribe function. 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.

Updating your personal information

We will take reasonable steps to ensure the personal information we hold about you is accurate, up-to-date and complete. Please let us know if there's a change to any of the details you have provided to us.

You have a right to ask for access to the personal information we hold about you. You are also entitled to ask us to correct that information. Please contact our Privacy Officer with any access or correction request.

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.

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. 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.

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.

How long do we keep your information for?

If we:

- no longer need to use or disclose your personal information for any purpose authorised by the APPs; and

- are not legally required to retain that information,

then we will take reasonable steps to destroy the personal information or have it de-identified.

Making a complaint

Please contact our Privacy Officer with any concerns about how we handle your personal information:
scott@strategicpf.com.au
Telephone: 0429 432 600
We will do our best to address your concerns, but if you still wish to lodge a formal complaint, please send details to the Privacy Officer in writing. We will normally respond in 30 days, confirming the next steps in the process.

If your complaint is not resolved by our Privacy Officer you can refer it to the Office of the Australian Information Commissioner.
Office of the Australian Information Commissioner
GPO Box 2999
Canberra ACT 2601, Australia
Phone: 1300 363 992
www.oaic.gov.au

Applicant Name .....

Applicant Signature .....

Date / /