

Protecting your privacy

Harzed Finance is committed to providing you with the highest levels of client service. This includes protecting your privacy. Detailed below is information that Harzed Finance requires to assist and communicate with you.

We may, from time to time, review and update this policy; including taking account of new or amended laws, new technology and/or changes to our business operations. All personal information held by us will be governed by the most recently updated policy. Your consent for use of your personal information can be written, orally agreed or implied from your course of dealings with us. If you do not agree (see 'How to contact us' at the end of this statement).

Your privacy matters to us, so whether you are new to Harzed Finance or are a long time user, please take the time to get acquainted with our privacy practices.

About us

Harzed Finance Pty Ltd commenced trading in 1995 and is a licensed credit assistance provider which holds Australian Credit Licence 391020.

In this document, 'Harzed', 'we', 'us' and 'our' are references to Harzed Finance Pty Ltd ACN 076 856 623 that is wholly owned by Private Capital Partners Pty Ltd ACN 125 343 428 ATF The ZHM Trust, a 100% proud Australian owned entity.

"Our website" in this document refers to our site www.harzedfinance.com.au

We provide a range of broker services in the credit and financial services industry. This includes products and services such as home and investment loans secured by residential property and car finance. Other non-regulated products and services include commercial property loans for business occupation, investment and construction and development, business finance, debtors finance and plant and equipment finance. We encourage our clients to review their insurance needs on a regular basis, especially when considering loans. If you require insurance products and services, and you provide us your consent, we may refer clients to insurance specialists that may, in some cases, pay us referral fees (in this case, you will be notified). Harzed Finance does not have its own lending products or any associated companies and is free of corporate excesses of any kind. We are passionate about the best possible client experience, not writing the most loans.

Your personal information

When we refer to personal information, we mean information or an opinion from which your identity is apparent or can reasonably be ascertained. The personal information we hold about you may also include credit information. Credit information is a sub-set of personal information and is information, which is used to assess your eligibility to be provided with finance. It 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 (CRB's). Harzed Finance may become aware of your personal credit information when interacting with a credit and finance provider (e.g. we may not be able to proceed with your credit or finance application due to an adverse notation on your credit file).

Your personal information and its protection are of utmost importance to us. Personal information held by us may include; (semi colon) your name, age or date of birth, current and previous addresses, telephone or mobile phone number, email address, bank details, professional job title or occupation, driver's licence number and financial details. We may hold details of your products and services you have acquired from us or have enquired about (including their status) together with any additional information necessary to deliver those products and services and to respond to your enquiries.

If you choose not to provide certain personal information (1) we may not be able to provide you with the services you require or the level of service on which we aim to offer, (2) we may be

unable to tailor our offering to your preferences and (3) your experience of our offering may not be as enjoyable or as useful.

You may need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them that we can be contacted for further information (see 'How to contact us' at the end of this statement).

How we collect personal information

We collect personal information in a number of ways. This may be acquired directly from the customer. For example; when you provide information by phone and email, in application forms or other agreements, or when you submit your personal details via our website (e.g. during an application or via our website) government entities, CRB's or your representatives. If we obtained your information through any of these methods and you would like a list of these entities or websites (see 'How to contact us' at the end of this statement).

How we use your personal information

Harzed Finance's highest possible client care starts from when we first meet and exchange information and continues beyond settlement. Upon post settlement, you are afforded continued ready access by phone, email where we will attend to any questions or assistance. Whether you require a review of your mortgage needs and objectives, loan variation matters (e.g. changes in loan approval limits, converting variable to fixed rates, converting interest only to principal and interest repayments or anything else you may wish to ask no matter how small your request may seem. Our tools for staying in touch with our clients include phone, email and email marketing.

The primary purpose for which we collect information about you is to enable us to perform our business activities, functions and to provide the highest possible quality of client experience. Your personal information may be used to: verify your identity, assist you to gain approval or provision of a product or service, provide the services you require, administer and manage those services such as payments, inform you of ways the services provided to you could be improved or additional services that you may benefit from, marketing Initiatives (explained below), research and develop our services provided, either directly or referred; gain an understanding of your information and credit or financial needs in order for us to provide you with a better service.

Also, your personal information is collected so that we, and our related entities can promote and market services to you (including by way of direct mail, telemarketing, email, SMS and MMS messages) (Marketing Initiatives - not necessary) in accordance with any applicable marketing laws. This is to keep you informed of products, services and special offers and we may continue after you cease holding an active product or service through us. If you do not wish for this to take place or continue, (see 'How to contact us' at the end of this statement)

When we disclose your personal information

We will never sell your information to any party. In order to deliver the services you require, we may disclose your personal information to outside organisations outside. Your personal information is disclosed to these organisations only in relation to us providing our services to you, these partners may include:

- Lenders, mortgage insurers, valuers, our aggregator, deposit bond providers, insurance providers and other mortgage intermediaries;
- Credit reporting agencies (such as Equifax);
- Government organisations as required by law;
- Other organisations which assist us (such as printers, mailing houses, lawyers, debt collectors and accountants);
- Your appointed advisors (such as your solicitor, conveyancer, accountant or real estate agent)
- Your partner, guarantor(s) or any persons acting on your behalf.

Unless you tell us otherwise, we may disclose your information to any person who is acting on your behalf, with your legal authority, or who is purporting to act with your legal authority. In addition, we may disclose your personal information to any other organisation that may wish to, or has acquired, an interest in your loan or in our business. We may also contact various organisations that have information about you and your associated companies so as to obtain the information we need to provide our services. The types of organisations we may collect your information from include:

- Employers (such as employment confirmation or an employment letter);
- Accountants (such as confirmation of your financials or an accountants letter);
- Solicitors or conveyancers;
- Credit reporting agencies (such as Equifax);
- Any other organisation that has information about you which we require to provide our services.

In certain circumstances we may be compelled by law to disclose your personal information to various authorities. For instance, we may be required under the *Financial Transaction Reports Act 1988* (Cth) to disclose details of financial transactions. Further, we may also be compelled under tax laws to provide such information.

Disclosure to external organisations

We may use external organisations for customer enquiries, mailing operations, information technology services, marketing and telemarketing market research and website usage analysis. This means we disclose your personal information (such as name and address) to them. We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

In addition, we may disclose your personal information to the police, any relevant authority or enforcement body, or your internet service provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary.

Transfer of information overseas

Harzed Finance does not have permanent employees based overseas. Occasionally, we may utilise contractors e.g. to support of our loan processing function and IT services that may be based overseas and/or in Australia and overseas. We may need to share with them some of your personal information, including credit information and the country in which this organization is located is in

- Serbia

If you are a client with an application in progress and you have any concerns regarding the use of our overseas contractors (see 'How to contact us' at the end of this statement)

Sensitive information

Sensitive information is any 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 or health information. We may seek, collect, use or disclose sensitive information about you, but only if that sensitive information relates directly to our ability to arrange or provide credit to you or manage the credit provided to you.

Unsolicited information

Sometimes people share information (including sensitive information) with us we have not sought out. This could be through using our website. If we receive unsolicited personal information (including sensitive information) about you, we will determine whether we would have been permitted to collect that information. If yes, then we will handle this information the same way we do with other information that we seek from you. If no, and the information is not contained in a Commonwealth record, then we will destroy or de-identify it as soon as practicable, but only if it is lawful and reasonable to do so. Often, it is not possible for us to neatly unbundle this information then destroy or de-identify only certain sections or parts of it, and we may need to store this information for future use, such as to help resolve disputes between us or assess future applications by you. We have many security safeguards in place to protect the information from interference, misuse, loss, unauthorised access, modification or disclosure.

Sharing with CRB's

Harzed Finance will interact with credit and finance providers and they in turn, will disclose information about you to a CRB when you are applying for credit, you have obtained credit from us, or if you guarantee or are considering guaranteeing the obligations of another person to us. Your information may be included in reports that the CRB gives other organisations (such as other lenders) to help them assess your credit worthiness. Some of that information may reflect adversely on your credit worthiness, for example, if you fail to make payments or if you commit a serious credit infringement (like obtaining credit by fraud). That sort of information may affect your ability to get credit from other lenders. We encourage our clients to seek their own personal credit report before they commence any loan application so that any inaccurate information can be amended to ensure your correct circumstances are reflected on your credit file.

Direct Marketing

Harzed Finance seeks out you to be the longest and most satisfied client and we are enjoy keeping in touch with you to keep you informed about products and services that we offer and may be suitable for you. We respect your privacy and we will never "abuse your inbox". We will send you or call you with relevant information as opposed to some programmed broadcast that will soon annoy you. If you do not wish to be contacted by Harzed, we invite you to (see 'How to contact us' at the end of this statement). We may conduct marketing activities via email, telephone, SMS, IM, mail, or any other electronic means. We may also market our products to you through third party channels (such as social networking sites). We will always let you know that you can opt out from receiving our third party marketing. Where we market to prospective customers, we will always provide an easy way to opt-outs. We will never sell your personal information to any external organisation. We will not use or disclose sensitive information about you for direct marketing purposes unless you have consented to that kind of use or disclosure.

Opt-Out

You can let us know at any time if you no longer wish to receive direct marketing offers from Harzed Finance. We will process your request as soon as practicable.

Information from third parties

Our website may contain links to Third Party Websites (e.g. third party providers of goods and services). We make no representations or warranties in relation to the privacy practices of any Third Party Website and we are not responsible for the privacy policies or the content of any third party website. Third Party Websites are responsible for informing you about their own privacy practices. If you accessed Third Party Websites through our website and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties. Where you access a Third Party Website from our website, cookie and web beacon information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

Online applications

When you send a completed online application to us, we retain the information contained in that application. We are able to then use that information to provide any services that you require. You may also be able to suspend and save online applications, so you can complete and send the applications at a later time. If you suspend or save your application, the information that you have entered will be retained in our systems so that you may recover the information when you resume your application. Online applications that have been suspended or saved may be viewed by us.

E-consent

By providing your email address and then clicking submit on any online application, calculator, tool or query, you consent to receiving notices and other documents from us by email to the email address provided, and you understand that that if you give this consent: we may no longer send you paper copies of notices and other documents; you should regularly check your email address for documents; and you may withdraw your consent to receiving documents by email at any time. You also confirm that you have the facilities to print any notice or document that we send you by email, if desired.

Accurate information

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you or others provided to us.

If you wish to make any changes to your personal information, please contact us. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete. You may request access to the personal information we hold about you by contacting us. We will respond to your request within a reasonable period. We will give access in the manner you have requested if it is reasonable to do so. We may charge you a fee to access the information. The fee will not be excessive or arbitrary and will not apply to the making of the request. We may deny you access to your personal information in certain circumstances, for example, if required or authorised by or under an Australian law or a court/tribunal order, or it would be likely to prejudice enforcement related activities by an enforcement body, if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If we decide not to give you access, we will provide reasons for the refusal and information on how you can complain about the refusal.

Storage and security

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: confidentiality requirements of our employees, document storage security policies, security measures for access to our systems, only giving access to personal information to a person who is verified to be able to receive that information, control of access to our buildings, and electronic security systems, such as firewalls and data encryption on our websites. We may store your information on the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from anywhere via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed here or those we referred to from time to time. In addition to the above, we also regularly review developments in security and encryption technologies. However, it is important to remember that the use of email and the internet may not always be secure, even with these safeguards in place. When we no longer require your information, and we are legally permitted to, we take reasonable steps to destroy or de-identify the information. However, sometimes it is impossible or impractical to completely isolate the information then completely remove all traces of the information, and we may store the information for future use, such as to help resolve disputes between us or assess future applications by you. The same security safeguards will be in place to protect the information, as detailed in our privacy policy.

Doing 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 provide you with the option to remain anonymous or to use a pseudonym, for example, when you make general inquiries about our business or current promotional offers. We do not adopt a government related identifier (such as your tax file number or your driver's licence number) as a means of identifying you.

How to contact us

You may contact us during business hours by telephone 1300 427 933 or via post Po Box 1691 Bondi Junction NSW 1355 or email zoran@harzedfinance.com.au

Complaints and further information

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 let us know about your complaint or feedback by contacting us at:

Zoran Malesevic
Harzed Finance
Email: zoran@harzedfinance.com.au
Tel: 1300 427 933

We have a formal procedure for investigating and dealing with privacy breaches. Once the Privacy Officer receives a complaint, whether it is in writing or verbal means, the Privacy Officer will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavour to determine the nature of the breach and how it occurred. We may contact you during the process to seek any further clarification if necessary. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time. By giving us as much information as possible, you will help us resolve things faster. And if you have any supporting documentation, please have it handy when you raise your concern. Most complaints are resolved quickly and you should hear from us within five business days. If you are dissatisfied with our response, you may make a complaint to the Privacy Commissioner which can be contacted on either www.oaic.gov.au or 1300 363 992. 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 policy and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices. As a consequence we may change this privacy policy from time to time or as the need arises.

By signing this Consent you agree that we may collect, use and disclose your personal information as set out in this Privacy Policy Statement