

1. About this Privacy Statement

Like you, Emoney Pty Ltd cares about ensuring that personal and private information you entrust us to hold is protected and secure.

This Statement outlines the personal information we collect from you and how we collect, hold, disclose, use and share it

Each member of Emoney ('Emoney Pty Ltd', 'we', 'us' and 'our') is committed to protecting and handling your personal information in accordance with all applicable laws including the *Privacy Act 1988* (Cth) (**Privacy Act**).

2. What you need to know

- We will take reasonable steps to protect your information.
- We will comply with the notification requirements of the Privacy Act if we are aware of your information being lost or compromised.
- We will never sell your information to a third party.
- We use information we hold to provide services to you, and to improve how we operate and provide those services.
- If you have concerns or questions about how we use or handle your information, get in touch with us at compliance@emoneyhomeloans.com.au

To ensure our services are provided to you, we may record our calls. As a part of using our services, you understand and provide us with your consent to record your telephone and online conversations with us.

3. Collection, use and sharing of personal information

3.1 Why do we collect your information?

We collect personal information to enable us to provide our services to you. We collect personal information relating to you and your financial requirements, in order to assist with providing you with home loan products and services through our website. If you don't want or are unwilling to provide us with the information we need, we may be unable to provide our services to you.

3.2 How do we collect your information?

We collect your personal information directly from you. We may also collect information about you from other sources, for example:

- your representatives such as a solicitor or conveyancer;
- joint applicants, co-applicants, or guarantors;
- referral partners, who refer your business to us;
- publicly available information such as public registers or social media;
- your employer;
- other organisations we partner with to provide products or services to you; and
- credit reporting bodies.

We collect personal information when you:

- enquire about, apply for, or use one of our products or services;
- speak to us about a loan application or a product or are a party to such loan application or product (for example, a joint applicant, co-applicant, guarantor, or director or trustee of a corporate or trust loan applicant);
- give us feedback or to make a complaint;
- visit our website or use our digital services;
- participate in other activities we offer, such as competitions or surveys; or
- talk to us or do business with us.

When you give us personal information about another person, you acknowledge that you are authorised by that person to do so and agree to inform that person of the contents of this Privacy Statement.

Examples of the personal information we may collect include:

- Personal and contact details.
- Australian Government, or foreign government identifiers and identity documents including driver's licence, passport and identification documents.
- Financial information, such as details of your recent and current employment, income, assets and liabilities, your credit history, tax returns, financial statements, bank statements, loan statements, credit card statements.
- Credit information, see section 6.1 for the types of credit information that we may collect.
- Socio-demographic information including marital status, age, gender, number of dependents, occupation, and nationality.
- When you visit or speak to us, we will collect data through call recordings and online interactions with us and CCTV camera recordings in our premises.
- Usage analytics which include online cookies. See section 6.2 for the types of usage analytics we may collect.
- Sensitive information, where this is:
 - relevant to your financial situation, or to an insurance policy or claim, or if you're in financial difficulty and ask for hardship relief due to illness; or
 - to assist with providing you with translation services.
- Information about your personal circumstances to ensure services are provided that meet your needs, this will include details about current or past relationship, and dependants or children you may have, details of an injury, illness, gambling or an addiction.
- Publicly available information, such as from social media or online forums and public registers.

3.3 Consumer Data Rights

Emoney is a trusted advisor defined under the *Competition and Consumer (Consumer Data Right) Rules 2020*, which allows us to receive your personal information from accredited third parties such as banks, financial institutions and authorised organisations where you have consented. We will only use and hold your personal information for the permitted purpose you have consented us to use your personal information for, which will be in accordance with this Privacy Statement.

3.4 How do we use your information?

We use your information in the following ways:

Serving you as a customer

To provide you with our or a third party's (if applicable) products and services. This may include:

- verifying your identity;
- assessing your eligibility for lender's products;
- assessing your needs and objectives in relation to buying a property;
- assisting you with online applications;
- assessing, processing, and submitting your application for credit and providing you with information about related insurance products;
- telling you about our other or third parties' products or services;
- managing our relationship with you or your business;
- better understanding you and your needs; and
- improving our services, products, and your experience with us.

Managing our operations and improving our business

For internal purposes, including reporting and analysis.

Systems development and testing purposes.

Learning which areas of our website and/ or app which are of most interest to you (see Cookies and web beacons in section 6.2).

Responding to complaints and seeking to resolve them.

Reviewing and responding to your feedback and assessing how you use our products or services.

Monitoring and reviewing call recordings, online chats and other business activities for quality assurance, training, and compliance purposes.

Managing corporate governance, and audit.

Understanding and managing our risks.

Complying with our legal obligations

Meeting our legal and regulatory obligations.

Sharing relevant information with law enforcement, government and regulatory bodies.

Identification, investigation and prevention of criminal activity.

Investigating health and safety issues.

3.5 Who do we share your information with?

We will never sell your personal information. We will share your information:

- across Emoney, including with our brokers and credit representatives;

- to external organisations to help us deliver the services we provide to you;
- to service providers who may facilitate gift or other promotional material to you; and
- to other third parties with your consent, such as lenders, conveyancing services providers, real estate agents to whom you have made enquiries with us about these services.

Before we share your information with any third party, we conduct reasonable and appropriate checks on that third party. We may share your information with the following types of third parties:

Our panel of lenders/credit providers

Your information will be provided as part of your credit application or a referral. If your information is provided for a loan application, the lender may list a credit enquiry on your credit file and will report certain details about your credit information to credit reporting bodies.

Government and law enforcement agencies

We may share your information with regulatory bodies, government agencies, the police, external dispute resolution bodies and law enforcement agencies.

Credit reporting bodies (CRBs)

We may provide and disclose your information to CRBs to obtain a credit report from them as an 'access seeker.' As an 'access seeker' our enquiry will not appear on your report or impact your credit score. However, if you decide to proceed and make an application through Emoney for a product, the credit provider may perform a credit report search, and this will leave a record on your credit file.

We may also disclose information about you to a CRB when you are applying for credit, you have obtained credit via us, or if you guarantee or are considering guaranteeing the obligations of another person to us. However, we do not provide any credit reporting information to the CRB.

When we give your information to a CRB, it 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 obtain credit from other lenders.

To learn more about how we use your credit information, please refer to section 6.1 below.

Authorised third parties

We may share information with third parties where you have authorised us to do so (either through express consent or where your consent may be reasonably inferred). They include:

parties we have a relationship with to enable you to enquire about the services or products they offer; for example, buyer's agent services, insurance or consumer asset finance products;

any person who proposes to guarantee or has guaranteed repayment of any credit provided to you;

co-applicants/joint applicants; or

third parties you have authorised to act for you (such as accountants, legal representatives, financial counsellors, financial advisors, or persons with a third party authority or power of attorney).

Our service providers

We may share your information with external service providers who we engage to do some of our work for us, for example mailing houses, legal service providers, marketing agencies, distribution partners, marketing research companies, information technology providers and cloud service providers.

Other third parties

Our auditors and insurers.

Organisations that assist us to identify, investigate or prevent fraud, cybercrime, or other misconduct.

Organisations involved in our funding arrangements.

Any person considering acquiring or taking an interest in our business.

As required by law.

3.6 Location of information we hold about you

We may hold or process your information on servers located overseas. When we do this, we make sure there are appropriate data handling and security arrangements that is aligned to the Australian Privacy Principles in the Privacy Act in place to protect your data. If our team members, brokers, and credit representatives perform their duties from overseas they will only use authorised Emoney systems and processes.

Where your information is sent overseas it is likely to be to one of the following countries:

- United States of America,
- The European Union,
- Canada,
- India,
- Malaysia,
- Philippines
- Asia Pacific
- New Zealand
- United Kingdom

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

As electronic or networked storage can be accessed from anywhere via an internet connection, it is not always practicable to know which country your information may be held in. If your information is stored in this way, disclosures may occur from time to time in countries other than those listed here or those we referred to.

4. Holding and protecting your information

We protect your information in a number of ways, including:

- confidentiality requirements of our team members and brokers;
- document storage security policies;
- security measures and procedures for access to our systems;
- only giving access to personal information to authorised or verified people; and
- control of access to our buildings

We have a plan that is designed to enable us to contain, assess and respond to suspected data breaches in a timely fashion, and to help mitigate potential harm to affected individuals.

Much of the information we hold about you will be stored electronically (such as electronic documents and audio recordings). Some information we hold about you will be stored on paper files until such time that it is uploaded to our systems and securely destroyed.

Our cybersecurity program and governance are aligned to industry standards, and we strive to meet or exceed standard security benchmarks. However, security incidents and data breach events can occur. If you have reason to believe that your interaction with us has been compromised, please contact us immediately using the details provided in *How to contact us* below.

We will keep your personal information while you are a customer of Emoney. We generally keep your personal information for up to 7 years after you stop being a customer, but we may keep your personal information for longer:

- to fulfil legal or regulatory obligations;
- for internal research and analytics; or
- to respond to a question or complaint.

If we receive information about you that we did not request or need, and if we decide we did not collect the information in accordance with this Privacy Statement and applicable Privacy laws, we will take reasonable steps to destroy or de-identify the information.

When we no longer require your personal information, and we are legally permitted to, we will take reasonable steps to destroy or de-identify the information. If it is impossible or impractical to completely remove the information, the same security safeguards will be in place to protect your personal information, as detailed in this Privacy Statement.

5. Consent for us to contact you and market to you

5.1 E-consent

By providing your email address and then clicking submit on any Emoney website, online form, application, calculator, tool, or query, you acknowledge that communication and document sharing may be electronic and not paper based. You acknowledge that electronic communications must be regularly checked. You may withdraw your consent to provide documents by electronic communication at any time through the opt out function on the electronic communication or by emailing us at compliance@emoneyhomeloans.com.au.

5.2 Direct Marketing

We may use your personal information and credit reporting information to provide direct marketing offers on our products and services (including educational content and new app features) we think may be of interest to you. This may be in the form of an email or other electronic means. You can opt out at any time by following the instructions below at section 5.3.

5.3 Opting out of direct marketing

You can let us know at any time if you no longer wish to receive direct marketing communications from us by:

- contacting us using the details provided in *How to contact us* below;
- contacting your broker; or
- using the method outlined in the marketing materials you have received.

We will not charge you for opting out. We will process your request as soon as we can, however it may take a few days for your profile updates to be reflected in our systems.

6. Other relevant information

6.1 Credit information

Credit information is a sub-set of personal information and may include information in relation to any loans that you have outstanding, your repayment history, opened and closed dates and any defaults. Usually, credit information is exchanged between credit providers and CRBs.

We may ask CRBs to give us your overall credit score and may use credit information from CRBs, together with other information to arrive at our own assessment of your ability to manage credit.

We may store your credit report onto the Emoney Platform when applying for a home loan through us. This also may include showing your credit score graphically, at points in time whenever you have requested a credit report to be generated, so we can show you how your credit score has been tracking. If you do not consent to our use of your information or storing your credit report on the Emoney Platform, we will not be able to proceed with your home loan application.

We may disclose your credit information to joint applicants or co-borrowers.

You have the right to request access to the credit information that we hold about you and to directly request a CRB to correct that credit information. You may also contact a CRB to advise them that you believe that you may have been a victim of fraud. For 21 days after the CRB receives your notification, the CRB must not use or disclose that credit information. You can contact any of the following CRBs for more information: illion (www.illion.com.au), Experian (www.experian.com.au), and Equifax Pty Limited (www.equifax.com.au).

6.2 Cookies and web beacons

Cookies

A 'cookie' is a small text file placed on your computer by a webpage server that may later be retrieved by webpage servers. We use cookies on our websites to provide you with a better website experience. When you visit one of our websites or related landing pages to read, browse, submit or download information, our system will record/log your IP address, date and time of your visit to our site, your user identifier (in some scenarios), the pages viewed and any information downloaded. We may automatically collect non-personal information about you such as the site from which you linked to our websites. Emoney may also use personal information from cookies in order to assist you with personalised services. You can configure your browser to refuse cookies or delete existing cookies from your hard drive. Rejecting cookies may have the effect of limiting access to, or functionality of, parts of our website.

Web beacons

A web beacon is typically a transparent graphic image invisible to the user that is placed on a website or in an email. The use of a web beacon allows the website to record the simple actions of the user (such as opening the page that contains the beacon) through a tracking pixel.

We may use web beacons (and cookies) for purposes such as site usage analytics, advertising auditing and reporting, as well as content and advertising/marketing or personalisation services. We may share any data collected from web beacon (and cookies) with third parties to provide you with relevant advertising when browsing third-party networks and websites such as Google and Facebook.

6.3 Changes to our Privacy Statement

We may update our Privacy Statement and procedures from time to time to help ensure we keep up to date with market expectations, legislative updates, practices and technology. Our latest Privacy Statement is available:

- on our Emoney website;
- by request using the contact details in *How to contact us* below; and
- directly from our brokers.

7. Personal information about employees, credit representatives, or employee or credit representative applicants

7.1 Reasons we may collect personal information from you

We will also collect personal information from you if you:

- apply for a job with, and/or become employed by us; or
- apply to become a credit representative or become a credit representative under one of our Australian Credit Licences.

In these circumstances, you:

consent for us to collect any personal information (whether written or verbal) from any referee or previous employer specified in your application for employment or curriculum vitae for evaluation of your application for employment and to hold such information on your personal file for future evaluation of your employment by us;

acknowledge that your personal information is collected for the purpose of evaluating your application for employment by us or your application to become a credit representative of ours;

acknowledge that should you accept employment with us or become a credit representative of ours, your personal information is collected and held for the purpose of assessing your continued engagement with us and the administration by us of your remuneration and contractual obligations; and

acknowledge that a failure by you to provide the requested personal information will have a detrimental effect on our ability to give your application proper consideration. You can request to access and/or correct your personal information in accordance with this Privacy Statement at any time.

8. Managing and accessing your information

8.1 Accessing and correcting your information

We need your help to ensure the information we hold on you is up to date and accurate. If you move or change contact details, please let us know as soon as possible.

If you need to access information that we hold about you, we can provide this information to you when you have contacted us using the details in *How to contact us* below.

There is no fee to ask for your information, but sometimes we might charge a fee to cover the time we spend gathering the information you want. We can provide you with general information, such as your name, address and contact details quite easily but other information may take longer to provide. If there's a fee, we'll let you know how much it is likely to be, so you can choose if you wish to continue. You'll need to make the payment before we begin gathering the information for you.

We will try to make your information available to you or to correct your personal information within 30 days of the date of your request.

In some cases, we can refuse access or only give you limited access to certain information. If we refuse to give you access to and/or

correct your information, we will give you written notice setting out the reasons for the refusal and the mechanisms available for you to complain about the refusal.

8.2 What to do if you have a privacy complaint

If you have a privacy complaint, or feel we have breached the Australian Privacy Principles, please contact us and we will investigate and let you the outcome as soon as possible.

You can contact us by using the details in *How to contact us* below.

9. How to contact us

If you need to contact us about any privacy related matter, please use the following details:

Emoney Privacy Officer

Email: compliance@emoneyhomeloans.com.au

Address:

Emoney Pty Ltd
PO Box 3485
Robina Town Centre, Qld 4230

10. How to contact the Office of the Australian Information Commissioner

Under the *Privacy Act 1988* (Cth), if you wish to make a complaint to the Office of the Australian Information Commissioner (**OAIC**) about the way we handle your personal information, you may do so by through here: [How to lodge a complaint with the OAIC](#)

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