

Privacy Policy

G.J. Finance

Who are we?

'We', 'us' and 'our' refer to GJ Gardner Finance Pty Ltd, ACN 611 968 784, Australian Credit Licence No 491282 and our related businesses.

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 collect from and hold about you and what we do with that 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.

What is Personal Information?

When used in this Privacy Policy, the term "Personal Information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered Personal Information.

What type of Personal Information does G.J. Gardner Finance Pty Ltd (otherwise known as GJ Finance) collect and hold about me?

We may collect any of the following information about you if you are a current or prospective borrower, if you visit our website or make an enquiry with us via another method:

- contact details (including, name, address, telephone number and email address);
- driver's licence number;
- current assets and liabilities details;
- desired liability (home loan) details; and
- details of property/s you have and/or wish to acquire.

Sometimes we may also need to ask you for other forms of Personal Information to enable us to provide services to you.

How does G.J. Finance collect Personal Information about me?

We collect your personal information directly from you unless it is unreasonable or impractical to do so. When collecting Personal Information from you, we may collect in various ways, including through when you write to or email us, when you access and use our website and during conversations between you and our representatives.

We may also collect information about you from the following third party sources:

- various databases in the public domain such as Telstra White Pages, Australia Post DPID database, Titles Office, Australian Financial Institutions or other property and financial databases;
- credit reporting bodies, law enforcement agencies and other government entities; and
- referrals and recommendations from existing clients of GJ Finance.

As part of its due diligence process prior to facilitating new loan agreements for you, we may also disclose your information to authorised credit-checking agencies.

What happens if we can't collect your Personal Information?

If you do not provide us with the Personal Information described above, some or all of the following may happen:

- we may not be able to provide our services to you, either to the same standard or at all;
- we may not be able to provide you with information about services that you may want or have enquired about, including information relating to new financial and/or lending products available to you; or
- we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

Why does G.J. Finance collect, hold and disclose your Personal Information?

We collect this information for a range of purposes including:

- enable us to provide you with the services and/or products you may require and/or have requested from us;
- to comply with local, state and federal legislation or regulations, including with respect to the National Consumer Credit Protection Act of 2009 (NCCP);
- to enable us and our third party partner businesses to assist you with related or ancillary services, as required;
- for our internal administrative, marketing, planning, product development and research requirements;

- to update our records and keep your contact details correct and accurate for future reference;
- to deal with your queries or customer service issues promptly, whether by email, telephone or mail;
- to keep you up-to-date with financial and lending services and/or products we think would be of particular interest and/or benefit to you;
- to conduct relevant business processing functions; and
- to process and respond to any complaint made by you.

Your Personal Information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

How does G.J. Finance use the Personal Information held about me?

Any Personal Information about you that we collect and records will only be used or disclosed by us for the purpose of:

- compliance with obligations under lending regulations and laws applicable for Australia;
- helping us efficiently and effectively deliver and improve on products and services;
- any other purpose you would reasonably expect us to use or disclose that personal information for that other purpose, and where that other purpose is related to the purpose for which the information is collected;
- to provide you with access to protected areas of our website, to assess the performance of our website and to improve the operation of our website;
- to conduct business processing functions including sharing personal information within GJ Finance and its lending partners, service providers or other third parties;
- for our administrative, planning, product or service development, quality control and research purposes; and
- complying with any other relevant state or national laws or regulations.

We may also use or disclose your Personal Information it collects for any other purpose specified to you at the time of collection.

If we wish to use or disclose any of your Personal Information in any other ways than described above, we will not do so unless it:

- have your express consent to do so;
- have reasonable grounds to believe that the use or disclosure is necessary to prevent a threat to life or health; or
- have reasonable grounds to believe that the use or disclosure is required by law or to enforce the law.

What about direct marketing?

We may send you direct marketing communications and information about our services that we consider may be of interest to you.

These may include:

- offering to provide you with products or services provided by us, our related entities and third party business partners; or
- sending you news and other information about GJ Finance or related entities' activities and general promotional material which we believe may be of interest to you.

These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). When we do this, we will provide you with an express opportunity to decline receiving any further communication from us of this type via an opt-out mechanism. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may at any time request not to receive direct marketing from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

The G.J. Finance website

Our privacy policy also applies to and is available on our website at www.gjfinance.com.au.

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 services you view so that, if you consent, we can send you news about those services.

We also use cookies to measure traffic patterns, to determine which areas 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 services and create a better online experience for you.

Our cookies do not collect Personal Information, although they do identify your browser. 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 users movements, and gather broad demographic information.

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.

Our website may contain links to other websites operated by third parties. 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.

Can I be anonymous when I deal with G.J. Finance?

To some extent you can preserve your anonymity when you deal with us. You can browse our website without providing any Personal Information, you can access our lending advertising in various publications and you can generally attend open homes with GJ Gardner Homes without providing personal details if you wish.

However, when you enter into discussions and/or transactions with us that involve the application for a new loan facility or a query or request regarding an existing loan facility, then various acts, statutory legislation and regulations require you to provide us with Personal Information so as to identify you.

What happens if I want to access or correct the Personal Information held about me?

You may request access to your Personal Information held by us at any time by contacting us (see details below). We will try to provide you with suitable means of accessing your Personal Information (for example, by mailing or emailing it to you), subject to some exceptions. We will respond to your request for access within 14 days and endeavour to provide the requested information within 30 days.

We may charge you a reasonable fee to cover its administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your Personal Information.

There may be instances where we cannot grant you access to the Personal Information we hold. For example, we may not be able to provide access to information in the following situations:

- where, in our opinion, providing your access may create a serious threat to the life or health of any individual or may be an unreasonable intrusion into the privacy of another individual;
- where your request for access is, in our opinion, frivolous or vexatious; or
- where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of law, or denying access is specifically authorised by law.

If for any reason we do not allow you to access your Personal Information, we will provide you with reasons in writing for our decision.

If you believe that Personal Information we hold about you is incorrect, incomplete or inaccurate, then you may request that we amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the Personal Information stating that you disagree with it.

Who does G.J. Finance disclose my Personal Information to?

We may disclose your Personal Information, in varying levels of detail:

- within GJ Finance and its related entities for the purpose of providing you with a service or product that we believe may benefit you or be of interest to you;
- to our employees and our contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you;
- to our lending partners and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- to any organisation for any authorised purpose with your express consent.

There are some instances when we need to provide your Personal Information to third parties. We may be bound by law to provide your details to government-related bodies, including the Titles Office, the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulatory Authority (APRA).

Sometimes we may need to outsource some of our administrative and other lending-related functions to external organisations such as advertising agencies, signwriters, building and garden maintenance contractors or consultants such as accountants, lawyers, surveyors, insurance advisors and other professionals.

Other third parties may include web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors and other business advisors and consultants. Most of the above organisations are bound by express or implied confidentiality obligations to us.

We may also need to provide your details to *GJ Gardner Homes* franchisees. We may also provide your details to third party business partners for the purpose of offering to provide you with products or services facilitated or provided by us or these business partners that we consider relevant to you.

We do not sell your personal details to other organisations. We may however use the information about you to assist us with internal marketing and research.

We may disclose Personal Information to our related bodies, corporate and third party suppliers and service providers located in Australia and/or 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 data hosting and other IT service providers, who may pass information to secondary data hosting providers located outside of Australia.

How does G.J. Finance keep my Personal Information secure?

We will take all reasonable steps to ensure information we collect, use or disclose is stored in a secure environment that is accessed only by persons authorised by GJ Finance so as to prevent interference, misuse, loss, unauthorised access, modification or disclosure.

If the Personal Information is no longer needed for any purpose, we will take reasonable steps to destroy or permanently de-identify the Personal Information.

We endeavour to provide a secure environment and a reliable system but you should be aware that there are inherent risks associated with the electronic storage and transmission of information (particularly via the Internet) which cannot be guaranteed to be 100% secure.

Who do I contact for further information?

Our Privacy Officer can assist you with any enquiries you have about the information that we hold about you. They can be contacted on (07) 5318 9040 from 9.00am to 5.00pm (Brisbane time), Monday to Friday.

You can also write to the Privacy Officer at:

GJ Gardner Finance Pty Ltd

Attention: Privacy Officer

PO Box 132

Buddina Qld 4575

E-mail: enquiries@gjfinance.com.au

What if I have a complaint or concern?

If you have a complaint or concern you can email, write or phone our Complaints Officer using the above contact details. We will do our best to try and resolve your complaint within 90 days.

What if you are unable to resolve my complaint or concern?

If we are unable to resolve your complaint within this time, or you are unhappy with the outcome, you may refer your complaint to our External Dispute Resolution Scheme provider, *Credit and Insurance Ombudsman (CIO)*. The Ombudsman can be contacted at the below details:

Credit and Insurance Ombudsman

Reply Paid 252

South Sydney NSW 1234

Phone: 1800 138 422

Fax: (02) 9273 8440

Web: www.cio.org.au

TTY: 133 677 then ask for 1300 555 727

How does this policy change over time?

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website and will be effective from the date of posting.

This privacy policy was last updated on 4th January 2018.

Although we intend to observe this policy at all times, it is not legally binding on us in any way unless as otherwise described as required under the relevant legislation. From time to time we may regard it as necessary or desirable to act outside the policy. We may do so, subject only to any other applicable contractual rights you have and any statutory rights you have under the Act or other applicable legislation.