

Westlawn Group Privacy Policy

The Westlawn group of companies ('Westlawn Group', 'we') offers a range of financial, insurance, investment, accounting and tax products, services and advice. The companies in the group comprise:

- Westlawn Finance Limited ABN 19 096 725 218 Australian Credit Licence Number 387844
- Westlawn Wealth Management Pty Ltd ABN 32 124 861 409 Corporate Authorised Representative of Affinia Financial Advisers Limited ABN 13 085 335 397 Australian Financial Services License Number 237857
- Westlawn Life Insurance Pty Ltd ABN 91 164 146 285 Corporate Authorised Representative Number 444800 of ClearView Financial Advice Pty Limited ABN 89 133 593 012 Australian Financial Services License Number 331367 GPO Box 4232 Sydney NSW 2001
- Westlawn Insurance Brokers Pty Ltd ABN 65 075 847 291 Australian Financial Services License Number 246520
- Westlawn Insurance Brokers (Coffs) Pty Ltd ABN 54 130 851 884 Authorised Representative Number 414146 of Westlawn Insurance Brokers Pty Ltd ABN 65 075 847 291 Australian Financial Services License Number 246520
- Westlawn Business Services Pty Ltd ABN 69 125 786 601
- Westlawn Financial Services Limited ABN 20 141 420 920 Australian Financial Services License Number 518648
- Westlawn Income Fund Australian Registered Scheme Number 639 742 288

We are committed to protecting your privacy and the confidentiality of all your information, including your personal information. In handling any information we hold about you, we comply with the Privacy Act 1988, including the Australian Privacy Principles, and where applicable the Privacy (Credit Reporting) Code.

Our privacy policy sets out how we collect and manage your personal information and how you can access that information if you wish.

Collection of personal information

We will collect personal information directly from you, wherever possible, unless you authorise an agent or intermediary, such as your broker, accountant or other third party, to provide us with the information required.

We collect your personal information for the following purposes:

- To provide you with information about any product or service we offer or which we can source for you
- To assess your application and eligibility for a product or service
- To provide you with the products and services you have requested from, or through, us
- To manage our relationship with you and manage the products or services you require
- To communicate with you about the products and services we offer or which we can source for you
- To assist us to run our businesses, including using information for training purposes, risk management, systems development and testing, archiving, record keeping, product and service development, undertaking planning, research and statistical analysis, obtaining legal advice and/or compliance services and other operational and administrative tasks
- Unless you tell us otherwise, to provide you with further information about our other products and services and/or products and services from selected service providers with whom we have a relationship
- To safeguard the security and integrity of the Westlawn Group, including preventing fraud and other criminal or undesirable activities affecting our customers and staff and/or other financial institutions; and
- To comply with Australian legal and regulatory obligations applying to our products, services and/or customers.

If you do not provide us with the requested information we will generally not be able to provide you with our products or services. You also can refuse to give, or withdraw, your consent in relation to any particular use of your personal information at any time. However, if you refuse to give your consent, or you withdraw your consent for particular uses, we may not be able to provide you with products or services you request.

Use or disclose of your personal information

We will use and disclose your personal information for the primary purpose for which it was collected, which is to provide you with the products and/or services you require either through us or other service providers with whom we have a relationship.

We may disclose your personal information to:

- Any third party product and/or service supplier with whom we have an arrangement so that either us or they may provide you with the information, product or service you have requested or in which you have expressed an interest
- Other service providers, including other financial institutions, insurers, credit reporting bodies and payment service providers, for account management purposes and/or to provide, or receive, an opinion or information about your credit worthiness, credit standing, credit history or credit capacity if you require finance
- Information verification services to verify your identity
- Credit reporting bodies prior, during or after a loan product is provided to you, including any overdue amounts which remain outstanding after we have issued the required notices and, if, in our opinion you have committed a serious credit infringement and/or to correct your personal or credit information
- Any person acting on your behalf, including your financial adviser, power of attorney, solicitor, accountant or agent
- Your personal contacts and/or your guarantor(s), where required
- Any person who introduces you to us, including brokers, dealers, retailers, accountants and agents
- Our external dispute resolution scheme if you lodge a complaint about us so we can resolve your concerns
- Organisations undertaking reviews of the integrity of our operations, including the accuracy and completeness of our information and/or our compliance with our regulatory obligations
- Our solicitors, valuers and insurers where appropriate
- Organisations involved in securitisation arrangements, include trustees of those arrangements, investors and their advisers
- Contractors and service providers who we engage to assist us manage our business, including legal, compliance, accounting, debt collection agencies, IT, systems, training and/or administrative services
- Regulatory authorities, if authorised or required by law
- Any party to whom we may wish to sell, or assign, any of our products, services or corporations.

Where we engage contractors to perform services for us, we prohibit the contractor from using personal information about you except for the specific purpose for which we supply it. In the majority of situations, your personal information is not made available to contractors or any other third party, except where required by law.

Personal information will only be disclosed to third parties, other than those listed above, if:

- You have expressly consented to your personal information being supplied to others
- You would reasonably expect us to disclose information of that kind to those third parties
- Authorised or required under Australian law or a court/tribunal order
- We are authorised or required to do so by law or if it is necessary to assist with law enforcement. For example, a regulator (such as the Australian Taxation Office or the Australian Securities & Investments Commission), a Court or the police can compel us to disclose personal information to them.

Other people's information you provide to us

If you provide us with personal information about someone else, such as a family members or your referees or guarantors, you must ensure you are entitled to disclose that information to us and that the person concerned knows about, and agrees to, our collection, use and possible disclosure of their information for the purposes described above.

Marketing

We may use your personal information to offer you products and services we believe may interest you. We will not sell or rent your personal information to any unrelated third parties for their marketing purposes without your explicit consent.

However, we may supply your personal information to direct marketing agencies, any company in the Westlawn Group so you can be offered products and services that may be of interest to you.

If you prefer not to receive marketing offers from us, or our affiliates, about our respective products and services, please let us know by:

- Contacting the Manager at your nearest Westlawn branch, or
- Emailing the Privacy Officer, Stewart Purser, at stewartp@westlawn.com.au or
- Calling the Westlawn Privacy Officer, Stewart Purser, on 1300 937 852, or
Writing to the Westlawn Privacy Officer
Westlawn Privacy Officer
Westlawn Group of Companies
22 Queen Street Grafton NSW 2460

We will act promptly on your request to remove you from our marketing database. We will also ensure any electronic marketing message we send you (e.g. by email) includes a method that enables you to tell us you do not want to receive future electronic marketing material.

Information Security

We store personal information in a combination of secure computer storage facilities and paper based files and other records.

We are committed to protecting your personal information from misuse, loss and interference. We also protect it from unauthorised access, modification and disclosure.

We limit access to those staff and service providers properly authorised to have access, including those who manage your financial product or service, provide you with a financial service or supply you with further information on our products or services.

We have in place a range of security measures designed to prevent unauthorised access or disclosure of your personal information, including physical security and up-to-date computer and network security systems.

We also de-identify or destroy your information when we no longer need it. If we no longer require your personal information for a purpose then we will take reasonable steps to securely destroy it or permanently remove all identifying features from that information.

This obligation is subject to any legal requirements to keep personal information for a certain period of time – in most cases, personal information records are kept for a period of 7 years after their creation or 7 years after an account is closed.

Information Storage

All information we hold in providing you with our products and services is held in Australia.

If, for any reason, we may need to send your personal information overseas (e.g. if required to complete a transaction or where we outsource a function to an overseas contractor), we will only do so if those offshore recipients can protect your privacy consistent with our Australian Privacy Act obligations.

Information Access

You may request us to provide you with access to the personal information we hold about you by contacting our Privacy Officer (refer to contact details in Marketing, above, or Contacts, below).

Please note that requests for access to your personal information may only be made by you or by another person who you have authorised to make a request on your behalf. Depending on the nature and/or volume of the information that you request, an access charge may apply, but not to your request for access itself.

We will respond to your access request as soon as possible and tell you how long it will take to provide the information.

We may exercise our right to deny access to particular information in certain situations. If we deny you access to your personal information, we will write to you to:

- Explain the reason your access request has been denied unless it would be unreasonable for us to do so given the grounds on which we have based our refusal; and
- The avenues available to you to complain about our refusal.

Updating your personal information

Although we take reasonable steps to ensure that your personal information is accurate, up-to-date, complete, relevant and not misleading at all times, we rely on the accuracy of information you supply to us from time to time.

If any of your personal information is incorrect, has changed or requires updating, please let us know by contacting our Privacy Officer (refer Marketing section, above, or Contacts section, below).

We will promptly update your personal information if it is inaccurate, out-of-date, incomplete, irrelevant or misleading depending on the reason we hold it.

If we correct personal information which we have previously disclosed to a third party, we will notify that third party of the corrected information, where the law requires us to do so.

If we disagree with your request to correct your personal information we will write to you to:

- Explain the reason your correction request has been denied unless it would be unreasonable for us to do so; and
- The avenues available to you to complain about our refusal.

Complaints

We are committed to resolving any concerns you have about how we manage your privacy as quickly as possible. We have procedures in place to help resolve any problems or complaints efficiently.

Please contact our Privacy Officer if you have any privacy concerns or require your information to be updated.

Should our Privacy Officer be unable to resolve your Privacy complaint to your satisfaction, you may refer the matter to our Internal Dispute Resolution service.

If you are not satisfied with how we resolve your privacy complaint or concern, you can refer your complaint to the Australian Financial Complaints Authority (AFCA), which is an independent external dispute resolution body.

You can contact them by:

- Phone at 1800 931 678
- Website www.afca.org.au
- Email via info@afca.org.au
- Mail at PO Box 3 Melbourne VIC 3001

If you are not satisfied with how AFCA resolves your complaint, then you can take your complaint to the Information Commissioner. The Commissioner can be contacted on:

- The privacy hotline 1300 363 992 or
- By going to www.oaic.gov.au.

Please go to the "Complaints" section of our website for information on how we deal with complaints - <http://www.westlawn.com.au/complaints/>

Website

In general, you can visit our website without telling us who you are or revealing any information about yourself. You will however be required to give us information about yourself and how to contact you if you send us an enquiry or apply for any of our products and services online.

Cookies

A cookie is a small amount of information stored on your computer by a website server. It is information that your web browser sends back to the web site server whenever you revisit a site. Cookies gather information about your operating system.

We may use this information to analyse the traffic on our website, and better serve you when you return, but it is not our intention to use this information to personally identify a user unless you request us to provide you with something specific, like information on a product or service.

You have the option to configure your Internet browser to notify you when you receive a cookie or to block all cookies. Please note, however, that if you refuse or otherwise block cookies you may not be able to use all of the functionality available on our website.

Links to other sites

This Privacy Policy does not apply to websites linking from our site. When you link to another site we recommend you read the privacy policy of that site.

We do not guarantee secure transmission of data transmitted via our website, despite our efforts to ensure all transmissions are secure in all respects.

Our contact details

Our contact details are:

- The Manager at your nearest Westlawn branch or
- Emailing the Privacy Officer, Stewart Purser, at stewartp@westlawn.com.au or
- Calling the Westlawn Privacy Officer, Stewart Purser, on 1300 937 852 or
- Writing to the Westlawn Privacy Officer
Westlawn Privacy Officer
Westlawn Group of Companies
22 Queen Street Grafton NSW 2460

Privacy Statement updates

We may update this Privacy Statement from time to time, whenever the law changes or we change our policies and procedures. Our current Privacy Statement will be available on our website or you can request a copy should you wish, using our contact details (above).

Effective as of 23 November 2020