

CREDIT INFORMATION POLICY

Vertical Capital Markets Pty Ltd, trading as VFS Group
(ABN 11 147 186 114) (AFSL and ACL No. 418 418)
Effective 12 March 2014. Last updated on 17 March 2016.

General Policy Statement

At Vertical Capital Markets Pty Ltd, trading as VFS Group ("VFS"), we take your privacy very seriously and understand the importance of protecting your personal information. In doing so, we are bound by and comply with the thirteen Australian Privacy Principles ("APP") contained in the *Privacy Act 1988* (Cth) ("Privacy Act"), and the Credit Reporting Privacy Code ("CR Code"). Our Privacy Policy can be viewed at www.vfsgroup.com.au. As VFS is classified as a Credit Provider under the Act, we have additional obligations relating to our collection, handling and disclosure of your Credit Information. The following document outlines our policy for the collection, use and disclosure of your Credit Information. Further information about our obligations in respect of Credit Information can be found in Part IIIA and Part IIIB of the Act, and in the CR Code.

What Credit Information do We Collect?

Credit Information is Personal Information which is directly relevant to determining your credit eligibility. We only collect Credit Information that is reasonably necessary for us to provide you with our financial services and products. If you do not provide us with the information we request, we may not be able to provide you with the services that you want. We may collect information such as: your name, address, phone number, email address, Tax File Number, bank account details, such other information as we may require to confirm your identity, information about your financial assets and liabilities, employment status, past and present investment profile and transactions; and any other information we require to provide our clients with their desired financial services and products.

How Credit Information is collected.

We collect most of your Credit Information directly from you when you apply for one or more of our financial services and products. We may also collect Credit Information about you from a Credit Reporting Body, and/or the issuer of specific services and products that we have previously provided to you, and/or from relevant government agencies. By using VFS' services you consent to us collecting your Credit Information.

Use of Credit Information.

VFS will only use your Credit Information for the purpose of determining your eligibility for our financial services and products, and then to provide you with those specific credit services and products, on an ongoing basis. VFS is required to safely store your Credit Information, and records of our dealings with it, for a minimum of 5 years.

Disclosure of Credit Information.

VFS generally will not provide any of your Credit Information to third-parties. However, in the course of providing our financial products and services to you we may also disclose your Credit Information:

- a) to the issuers of specific financial products and services that we provide to you;
- b) to a relevant Credit Reporting Body;
- c) to government regulatory authorities and enforcement agencies; and/or
- d) where we are otherwise required or authorised to do so by law.

VFS will provide you with prior notification of the details of the persons and/or organisations to whom it contemplates making such disclosures. VFS may also disclose your Credit Information to a Credit Reporting Body upon the occurrence of a Default Event (Failure to perform your obligations under our credit agreement). We will only do so, after attempting to contact you and giving you appropriate notices under the Act and the CR Code. Please note, that VFS may use your Personal Information to communicate with you on an ongoing basis, with your consent, as per our Privacy Policy. Our Privacy Policy can be viewed at www.vfsgroup.com.au.

Access to, Correction of, or Updating of Your Credit Information.

Generally, we will provide you with access to your Credit Information that we hold within a reasonable time-frame upon receipt of a written request. We may not grant access to you, if a relevant exception under the Privacy Act applies. If you believe that the Credit Information we hold is inaccurate, incomplete or out-of-date, contact us immediately about your concerns. If we determine your concerns to be valid, we will aim to update the Credit Information we hold within 30 days, provide you with written notice of the correction, and notify all third-parties who have received previous related disclosures from us, of the correction. Alternatively, if we disagree with your concerns, we will note the issues on your records that we hold, provide you with written

notification of our reasons, and outline any additional avenues of redress open to you. If you are unhappy with our handling of your request or complaint, you may contact our external dispute resolution provider:

Financial Ombudsman Service Limited
GPO Box 3
Melbourne VIC 3001
Ph: 1800 367 287
Fax: +61 3 9613 6399
Email: info@fos.org.au

Alternatively, you can contact the Office of the Australian Information Commissioner, and make further complaint. It is your responsibility to keep us informed of any changes to your Credit Information. You can do so, by notifying us in writing, or by giving us a telephone call. From time-to-time we may request that you review, confirm and advise us of changes to your Credit Information.

Security of Credit Information.

VFS is committed to protecting your privacy. We take all reasonable steps to ensure that your Credit Information is not misused, lost, or accessed and/or disclosed by unauthorised persons.

Cross-border Disclosure of Personal Information.

We may transfer your Credit Information to related bodies corporate and unaffiliated service providers in locations outside Australia's territorial jurisdiction in the course of storing, using or disclosing that information. Prior to doing so, VFS will inform you of its intention to do so, and gain your specific written consent. VFS will also take all reasonable steps to ensure that the overseas recipient deals with that information in ways consistent with the Privacy Act, the APP, and the CR Code. That being said, the overseas recipient may not have privacy protections exactly equivalent to those in Australia.

Disposal of Credit Information.

If we no longer need to hold your Credit Information for the primary purpose of collection, or as otherwise required by law, we will take all reasonable steps to de-identify and then irretrievably destroy that information.

Contacting Us and Making Complaints.

If you wish to contact us for any reason regarding our Credit Information Policy, including to make a complaint about our handling of your Credit Information, you can do so by addressing our Privacy Officer in writing, setting out your complaint and your up-to-date contact details. Upon its receipt, our Privacy Officer will promptly investigate the matter and provide you with a response within 30 days. If you are unhappy with our resolution of your complaint, and you are an individual located in Australia, you can contact our external dispute resolution provider:

Financial Ombudsman Service Limited
GPO Box 3
Melbourne VIC 3001
Ph: 1800 367 287
Fax: +61 3 9613 6399
Email: info@fos.org.au

Alternatively, you can contact the Office of the Australian Information Commissioner, and make a further complaint.

Changes to Our Credit Information Policy.

From time to time it may be necessary to amend this Credit Information Policy and we reserve our right to do so. Any changes will be made as required and we will advise you of the changes to our Credit Information Policy by posting an updated version on our website, and/or by providing you with a personal notification of the changes.

Contact Details.

If you have a question, comment or complaint regarding our Credit Information Policy, please contact us directly to discuss your concerns:

VFS Group
The Privacy Officer
GPO Box 4929
SYDNEY NSW 2001
Ph: 1300 220 360
Fax: +61 2 8072 6271
E: info@vfsgroup.com.au