

# Privacy Policy (Web)

C1 Finance

Company:	C1 Finance PTY LTD
ACN:	113 695 453
Credit Licence:	386 366
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## General

As part of C1 Finance PTY LTD's ("**C1 Finance**") process to ensure that it continues to maintain the highest levels of professional integrity and ethical conduct, C1 Finance has adopted this Privacy Policy ("**Policy**") to manage Personal Information in an open and transparent manner.

The provisions of this Policy will assist C1 Finance in complying with the requirements of the *Privacy Act 1988* (Cth) and the Australian Privacy Principles in protecting the Personal Information C1 Finance holds about its clients.

This Policy applies to all representatives and employees of C1 Finance at all times and the requirements remain in force on an ongoing basis.

## What we collect

### PERSONAL INFORMATION

The Personal Information C1 Finance collects may include any information from which your identity is reasonably apparent (name, address, date of birth etc.). C1 Finance must not collect Personal Information unless the information is reasonably necessary for one or more of C1 Finance's functions or activities.

### SENSITIVE INFORMATION

The Sensitive Information C1 Finance collects may include: racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership or associations etc. C1 Finance must not collect Sensitive Information about an individual unless:

- (a) the individual consents to the collection of the information and the information is reasonably necessary for one or more of C1 Finance's functions or activities
- (b) the collection of the information is required or authorised by or under an Australian law or a Court/Tribunal Order; or
- (c) a permitted health situation exists in relation to the collection of the information by C1 Finance.

### CREDIT-RELATED INFORMATION

Where C1 Finance receives a request for credit, the prospective client will be required to provide C1 Finance with Credit Information. Please refer to C1 Finance's Credit Reporting Statement for further information.

## How we collect

C1 Finance must only collect Personal Information by lawful and fair means.

C1 Finance must only collect Personal Information about an individual from the individual (rather than someone else), unless it is unreasonable or impracticable to do so or the individual has instructed C1 Finance to liaise with someone else.

C1 Finance will collect Personal Information from an individual when:

- a) C1 Finance's Application Form is completed;
- b) Supporting and additional information is requested and supplied to C1:
  - i) representatives over the telephone
  - ii) by email or text;
  - iii) by submitting to the C1 Finance website;

**Collecting information about you from someone else:** We may collect personal information about you from someone else, such as from but not limited to credit reporting bodies or credit providers or other people or organisations when we are assessing your credit application or collecting a debt you owe.

If C1 Finance:

- (a) determines that it should not have collected the Personal Information; and
- (b) the information is not contained in a Commonwealth record,

C1 Finance must as soon as practicable, destroy the information or ensure that the information is De-identified, only if it is lawful and reasonable to do so.

## Why we collect

If an individual is acquiring or has acquired a product or service from C1 Finance, the individual's Personal Information will be collected and held for the purposes of checking whether an individual is eligible for C1 Finance's product or service;

- a) disclosing an individual's Credit Information to any of C1 Finance's related companies that are assisting providing credit;
- b) providing the individual with C1 Finance's product or service;
- c) managing and administering C1 Finance's product or service;
- d) to assess your application and manage your account with us;
- e) to assess your creditworthiness
- f) to engage a credit reporting body to conduct a credit and reference check;
- g) to collect payments that are owed to C1 Finance in respect of any credit that has previously provided to the individual;
- h) for research purposes to better improve our website, products or services;
- i) any other customer support purposes;
- j) to notify credit providers of a default, by you, of your agreement with us;

- k) protecting against fraud, crime or other activity which may cause harm in relation to C1 Finance's products or services;
- l) responding to a complaint;
- m) where the individual otherwise expressly consents to the use or disclosure;
- n) complying with legislative and regulatory requirements in any jurisdiction;
- o) statistical purposes;

C1 Finance may also collect Personal information for the purposes of letting an individual know about products or services that might better serve their needs or other opportunities in which they may be interested.

Collection required by law: Collection of some personal information about you may also be required or authorised by or under an Australian law. These laws include:

- the Anti-Money Laundering and Counter-Terrorism Financing ACT 2006 (Cth), which requires us to collect personal information about you when verifying your identity;
- the National Consumer Credit Protection Act 2009 (Cth), which requires us to make inquiries about you
- the Personal Property Securities Act 2009 (Cth), under which we may need to collect personal information about you to record a security interest on the Personal Property Securities Register

## **When do we Disclose Information?**

C1 Finance must not use or disclose the information unless:

- a) the individual has consented to the use or disclosure of the information;
- b) or the individual would reasonably expect C1 Finance to use or disclose the information for the secondary purpose and the secondary purpose is related to the primary purpose
- c) or the use or disclosure of the information is required or authorised by or under an Australian law or a Court/Tribunal Order; or
- d) a Permitted General Situation exists in relation to the use or disclosure of the information by C1 Finance;
- e) C1 Finance reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Where C1 Finance uses or discloses Personal Information in accordance with section 11.1(e), C1 Finance will keep a copy of this disclosure (e.g. the email or letter used to do so).

## Who do we Disclose Information to?

C1 Finance may disclose Personal Information collected from clients and prospective clients to the following:

- a) organisations involved in maintaining, reviewing and developing C1 Finance's business systems, procedures and infrastructure, including testing or upgrading C1 Finance's computer systems;
- b) organisations involved in a corporate reorganisation;
- c) organisations involved in the payments system, including financial institutions, merchants and payment organisations;
- d) organisations involved in product planning and development;
- e) other organisations, who jointly with C1 Finance, provide its products or services;
- f) authorised representatives who provide C1 Finance's products or services on its behalf;
- g) the individual's representatives, including your legal advisers;
- h) debt collectors and assignees of your debts;
- i) C1 Finance's financial advisers, legal advisers or auditors; fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- j) external dispute resolution schemes;
- k) regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.
- l) Credit reporting bodies
- m) persons who act as your guarantor or who provide security for credit to you;
- n) our professional advisors, including our lawyers, auditors and accountants.

Credit reporting bodies: The credit reporting bodies that we are likely to disclose your personal information to, but not limited to, are:

<https://www.equifax.com/>

<https://www.illion.com.au/>

<https://www.experian.com.au/>

## Direct Marketing

C1 Finance must not use or disclose the Personal Information it holds about an individual for the purpose of direct marketing.

### **EXCEPTION – PERSONAL INFORMATION OTHER THAN SENSITIVE INFORMATION**

C1 Finance may use or disclose Personal Information (other than Sensitive Information) about an individual for the purposes of direct marketing if:

- a) C1 Finance collected the information from the individual; and the individual would reasonably expect C1 Finance to use or disclose the information for that purpose;
- b) C1 Finance has collected the information from a third party; and either:
  - (i) C1 Finance has obtained the individual's consent to the use or disclose the information for the purpose of direct marketing; or
  - (ii) it is impracticable for C1 Finance to obtain the individual's consent; and
- c) C1 Finance provides a simple way for the individual to opt out of receiving direct marketing communications from C1 Finance
- d) in each direct marketing communication with the individual C1 Finance:
  - (iii) includes a prominent statement that the individual may opt out of receiving direct marketing; or
  - (iv) directs the individual's attention to the fact that the individual may opt out of receiving direct marketing; and
- e) the individual has not made a request to opt out of receiving direct marketing.

#### **EXCEPTION – SENSITIVE INFORMATION**

C1 does not use or disclose sensitive information for the purpose of direct marketing unless direct permission has been given by the individual.

## **Government Related Identifiers**

C1 Finance must not disclose government related identifiers unless required under Australian Law or where reasonably necessary for C1 Finance to verify the identity of the individual for the purposes of the organisation's activities.

## **Security and Storage of Information**

C1 Finance will ensure that it protects any Personal Information it holds from misuse, interference, loss, unauthorised access, modification and disclosure.

C1 Finance will take reasonable steps to destroy or de-identify Personal Information it holds where:

- a) C1 Finance no longer needs the Personal Information for any purpose for which the information may be used or disclosed by C1 Finance; and
- b) the information is not contained in a Commonwealth record; and
- c) C1 Finance is not required to retain that information under an Australian law, or a Court/Tribunal Order.

C1 Finance stores Personal Information in different ways, including:

- a) hard copy on site at C1 Finance's head office;
- b) electronically secure data centres which are located in Australia and owned by either C1 Finance or external service providers;

## Complaints

C1 Finance offers a free internal complaint resolution scheme to all customers. Should a client have a privacy complaint, they are to contact C1 Finance to discuss their concerns using the following contact details:

- (a) Email: [info@c1finance.com.au](mailto:info@c1finance.com.au)
- (b) Phone: 1300 732 520
- (c) Post: PO Box 7534, East Brisbane

C1 Finance will rectify any breach if the complaint is justified and takes necessary steps to resolve the issue.

After a complaint has been received, C1 Finance sends the customer a written notice of acknowledgement setting out the process. The complaint is investigated, and the decision sent to the customer within thirty (30) days unless the customer has agreed to a longer time.

If the customer is not satisfied with C1 Finance's internal privacy practices or the outcome in respect to complaint, the customer may approach the OAIC with their complaint:

Office of the Australian Information Commissioner

**Address:** GPO Box 5218, Sydney NSW 2001

**Phone:** 1300 363 992

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Website:** [oaic.gov.au](http://oaic.gov.au)

## Notifiable Matters

We may disclose any notifiable matter to a credit reporting body, for example a loan default. Please refer to the C1 Credit Reporting Policy on our website for more information.

## Policy Changes

We may change this privacy policy from time to time. Such amendments will be effective at the time the amended policy is published on our website.