

## Privacy Policy

Ostara Finance Pty Ltd (**Ostara**) values and respects the privacy of the people we deal with. Ostara is committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) (**Privacy Act**) and other applicable privacy laws and regulations.

This Privacy Policy (**Policy**) describes how we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information.

### What is personal information?

**Personal information** means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

### What personal information do we collect?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

The personal information we collect about you may include:

- name
- mailing or street address
- date of birth
- email address
- phone number
- **credit-related information**, which means credit information and credit eligibility information.

**Credit information** is personal information or an opinion about you that has a bearing on credit that has been provided to you or that you have applied for. This includes information about your identity; the type, terms and maximum amount of credit provided to you, including when that credit was provided and when it was repaid; repayment history information, default information (including overdue payments); payment information; new arrangement information; financial hardship arrangement information including whether you have made a financial hardship arrangement with us; details of any serious credit infringements; court proceedings information; personal insolvency information and publicly available information.

**Credit eligibility information** is credit reporting information supplied to us by a credit reporting body, and any information that we derive from it.

Under certain circumstances, Ostara may need to collect sensitive information about you. This might include any information or opinion about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual preferences, criminal record, or health information.

If we collect your sensitive information, we will do so only with your consent, if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously. However, if you choose to deal with us in this way or choose

not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

### **How do we collect your personal information?**

We collect your personal information directly from you when you:

- interact with us in person, over the phone or online
- participate in surveys or questionnaires.
- attend an Ostara event
- subscribe to our mailing list
- apply for a position with us as an employee, contractor

### **Collecting personal information from third parties**

We may also collect your personal information from third parties or through publicly available sources (eg credit reporting agencies or government agencies). We collect your personal information from these third parties to provide services to you or for marketing or research purposes.

### **How do we use your personal information?**

We use personal information for many purposes in connection with our functions and activities, including the following purposes:

- provide you with information or services that you request from us
- deliver to you a more personalised experience and service offering
- improve the quality of the services we offer
- internal administrative purposes
- marketing and research purposes

We use your credit-related information to assess your eligibility to be provided with finance. Usually, credit information and credit eligibility information is exchanged between credit and finance providers and credit reporting bodies.

### **Disclosure of personal information to third parties**

We may disclose your personal information to third parties in accordance with this Policy in circumstances where you would reasonably expect us to disclose your information. For example, we may disclose your personal information to:

- existing or prospective funders or other intermediaries in relation to your finance requirements
- other guarantors, borrowers and other security providers (if more than one)
- borrowers or prospective borrowers, including in relation to any credit you guarantee or propose to guarantee.
- other organisations that are involved in managing or administering your finance such as valuers, surveyors, third party suppliers, printing and postal services, call centres, lenders mortgage insurers, trade insurers, recovery firms, debt collectors, lawyers, and credit reporting bodies
- our agents, contractors, or external service providers to outsource certain functions, for example, statement production, debt recovery and information technology support
- businesses we have a relationship with that may want to market products to you
- companies that provide information and infrastructure systems to us
- anybody who represents you, such as a lawyer, guardian, person holding power of attorney, accountant, or tax agent

- anyone, where you have provided us consent
- our auditors, insurers, re-insurers and health care providers
- claims related providers, such as assessors and investigators who help us with claims
- where we are required to do so by law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 or in accordance with a subpoena or summons issued by a court
- organisations involved in our funding arrangements or those of our loan aggregator, trustee, warehouse funder, investor, rating agency, agent, auditor or adviser, or any entity that has an interest in our business or your finance
- other financial institutions, for example to process a claim for mistaken payment
- organisations that provide products or services used or marketed by us
- your current or previous employer, referees or identity verification services

### **Transfer of personal information overseas**

We may disclose your personal information, including credit-related information, to overseas entities that provide support functions to us or our finance aggregator (including in USA, Canada, Malaysia, India, Ireland, the United Kingdom and the Philippines). You may obtain more information about these entities by contacting us. We will only disclose your credit-related information to entities that are located overseas if you have given us your consent to disclose personal information to that third party or we reasonably believe that the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the Australian Privacy Principles and the law or binding scheme can be enforced, or the disclosure is required or authorised by an Australian law or court / tribunal order.

### **Credit-related information**

We exchange credit-related information for the purposes of assessing your application for finance and managing that finance. If you propose to be a guarantor, one of our checks may involve obtaining a credit report about you.

The credit-related information we hold about you may be held by us in electronic form on our secure servers and may also be held in paper form. We use cloud storage to store personal information and this credit-related information that we hold. The cloud storage and the IT servers may be located outside Australia.

When we obtain credit eligibility information from a credit reporting body about you, we may also seek publicly available information and information about any serious credit infringement that you may have committed.

The credit reporting bodies we use are Equifax Pty Ltd, Experian Australia Credit Services Pty Ltd and Illion Australia Pty Ltd. You can download a copy of their privacy policies at: [equifax.com.au](http://equifax.com.au); [experian.com.au](http://experian.com.au); or [illion.com.au](http://illion.com.au).

### **Notifiable matters**

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit-related information. You may request to have these notifiable matters (and this privacy policy) provided to you in an alternative form.

We exchange your credit-related information with credit reporting bodies. We use the credit-related information that we exchange with the credit reporting body to confirm your identity, assess your creditworthiness, assess your application for finance and manage your finance.

The credit reporting body may provide the information that we report about you to other credit providers to assist them to assess your credit worthiness. We may also obtain information that other credit providers have provided to the credit reporting body to use in our assessments of your credit worthiness.

The information we may exchange with credit reporting bodies includes your identification details, what type of loans you have, how much you have borrowed, whether or not you have met your loan payment obligations and if you have committed a serious credit infringement (such as fraud).

If you fail to meet your payment obligations in relation to any finance that we have provided or arranged, or you have committed a serious credit infringement then we may disclose this information to a credit reporting body.

You have the right to request access to the credit-related information that we hold about you and make a request for us to correct that credit-related information if needed.

Sometimes your credit-related information will be used by credit reporting bodies for the purposes of 'pre-screening' credit offers on the request of other credit providers. You may contact the credit reporting body at any time to request that your credit-related information is not used in this way.

You may contact the credit reporting body to advise them that you believe that you may have been a victim of fraud. For a period of 21 days after the credit reporting body receives your notification that you have been a victim of fraud, the credit reporting body must not use or disclose that credit-related information. You can contact any of the following credit reporting bodies for more information:

- [equifax.com.au](http://equifax.com.au)
- [illion.com.au](http://illion.com.au)
- [experian.com.au](http://experian.com.au)

### **Notifiable Data Breaches**

The Privacy Act includes a Notifiable Data Breaches (**NDB**) scheme which requires us to notify you and the Office of the Australian Information Commissioner (**OAIC**) of certain data breaches and recommend steps you can take to limit the impacts of a breach (for example, a password change).

The NDB scheme requires us to notify about a data breach that is likely to result in serious harm to affected individuals. There are exceptions where notification is not required. For example, where we have already taken appropriate remedial action that removes the risk of serious harm to any individuals.

If we believe there has been a data breach that impacts your personal information and creates a likely risk of serious harm, we will notify you and the OAIC as soon as practicable and keep in close contact with you about the nature of the breach, the steps we are taking and what you can do to reduce the impacts to your privacy. If you believe that any personal information, we hold about you has been impacted by a data breach, you can contact us at [info@ostarafinance.com.au](mailto:info@ostarafinance.com.au).

### **How do we protect your personal information?**

Ostara will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- having a robust physical security of our premises and databases / records

- taking measures to restrict access to only personnel who need that personal information to effectively provide services to you
- having technological measures in place (for example, anti-virus software, fire walls)

### **Online activity**

The Ostara website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and the Ostara website(s).

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

### **Direct marketing**

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication.

### **Retention of personal information**

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

### **How to access and correct your personal information**

Ostara will endeavour to keep your personal information accurate, complete and up to date.

If you wish to make a request to access and / or correct the personal information we hold about you, you should make a request by contacting us.

### **Links to third party sites**

Ostara website(s) may contain links to websites operated by third parties. If you access a third-party website through our website(s), personal information may be collected by that third party website. We make no representations or warranties in relation to the privacy practices of any third-party provider or website and we are not responsible for the privacy policies or the content of any third party provider or website. Third party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.

### **Inquiries and complaints**

For complaints about how Ostara handles, processes or manages your personal information, please contact [info@ostarafinance.com.au](mailto:info@ostarafinance.com.au). Note we may require proof of your identity and full details of your request before we can process your complaint.

If you are not satisfied with Ostara's response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at [www.oaic.gov.au](http://www.oaic.gov.au)) to lodge a complaint.

We will aim to acknowledge your complaint within seven days. We aim to provide you with a decision on your complaint within 30 days.

### **How to contact us**

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance by email at [info@ostarafinance.com.au](mailto:info@ostarafinance.com.au).