



# Credit Guide and Privacy Statement

## ABOUT US (“we, us, our”):

<b>Credit Representative</b>	Thuy Hook Credit Representative Number 456333
<b>An employee or representative of:</b>	
<b>Corporate Credit Representative</b>	EZ Financing Pty Ltd ACN: 602952385 Credit Representative Number 470618
<b>Contact Details for Credit Representative and Corporate Credit Representative</b>	Address: 19 Centre St Strathpine QLD 4500 Tel: 0449 150 117 Fax: Email address: thuy.hook@ezfinancing.com.au Website: <a href="https://ezfinancing.com.au/">https://ezfinancing.com.au/</a>
<b>Licensee</b>	BLSSA Pty Ltd ACN 117 651 760 (“BLSSA”) Australian Credit Licence Number: 391237 Level 10, 101 Collins St Melbourne VIC 3000 Tel: 03 86161000 Fax: 03 86161677
<b>Broker Group</b>	Pennley Pty Ltd ACN 071 979 498 as trustee for the Pennley Unit Trust Credit Representative Number: 392528

This document provides you with information relating to our activities and those of our credit representatives. It contains information about various fees and charges that may be payable by you to us, as well as about certain commissions we may receive from a licensee when we are acting as a credit representative, or we pay to certain third parties. It also contains information about what you should do if you have a complaint or dispute in connection with our services as a credit representative.

## WHAT IS A CREDIT REPRESENTATIVE?

A ‘credit representative’ is a person who has been authorised by a credit licensee to engage in specified credit activities on behalf of the licensee. Our licensee is BLSSA.

BLSSA is a member of the National Australia Bank Group of companies (National Australia Bank Group).

## WHAT IS CREDIT ASSISTANCE?

We give you credit assistance when:

- we assist you to apply for a particular loan or lease;
- we suggest you apply for a particular loan or lease (or suggest you apply for an increase to an existing loan); or
- we suggest you remain in your current loan or lease.

## THE ASSESSMENT WE NEED TO DO BEFORE GIVING YOU CREDIT ASSISTANCE

Before we provide credit assistance to you, we assess whether the particular loan or lease is suitable for you. To do this, we need to make reasonable inquiries and verify that:

- the loan or lease or increase will meet your requirements and objectives; and
- you can meet the proposed repayments.

We won't be able to give you credit assistance if our assessment shows that:

- you won't be able to meet the proposed repayments without substantial hardship; or
- the loan or lease won't meet your requirements or objectives.

## GETTING A COPY OF OUR ASSESSMENT

If we provide you with credit assistance, you can ask us for a copy of our assessment any time up to 7 years after we provide you with a credit assistance quote. To request a copy please contact us. We will provide you with a copy:

- within 7 business days after the day we receive your request – provided you make the request within 2 years of the date of our credit assistance quote; or
- otherwise, within 21 business days after the day we receive your request.

## INFORMATION ABOUT THE LICENSEE AND ITS CREDIT REPRESENTATIVES

We act as a credit representative for BLSSA. We are authorised to engage in credit activities including providing credit assistance on its behalf.

Subject to meeting credit criteria, we are able to assist you to obtain loans and leases for you from a broad range of lenders and lessors through our Broker Group. Our Broker Group does not require us to recommend any particular lender and our Broker Group does not set any quotas or obligations on us relating to recommending any particular product.

The Broker Group's panel of lenders includes a number of lenders and loan distributors that are part of the National Australia Bank Group. These include National Australia Bank Ltd and ChoiceLend Pty Ltd.

The following are the Top 6 residential lenders and % of business written in the previous financial year:

## List of Lenders

Bank	%
Suncorp	19
CBA	16
Choicelend	11
Bankfirst	10
Westpac	9
Bankwest	8

## OWNERSHIP

CHOICE	<p>We obtain mortgage aggregation services from the Broker Group. The Broker Group is a member of the National Australia Bank Group. The Broker Group provides services at arm's-length to our business which include IT systems, loan information and lodgement systems, training and development, commission processing, conferences and professional development events, and assistance with regulatory and compliance obligations. In consideration of the services the Broker Group gives us, we pay fees to the Broker Group or the Broker Group retains some of the commission panel lenders pay on loans we arrange. We have access to Broker Group panel of lenders including NAB Group and Broker Group branded products.</p> <p>Our business is owned and managed independently from the Broker Group and National Australia Bank Limited (NAB).</p>
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## FEES AND CHARGES

### FEES PAYABLE FOR THE PROVISION OF CREDIT ASSISTANCE

We may charge a fee for providing credit assistance. More detail about those fees will be set out in a quote we will give to you before we provide you with credit assistance.

### FEES PAYABLE IN RELATION TO ACTING AS A CREDIT REPRESENTATIVE

We may receive remuneration from our employer, BLSSA and/or Broker Group and do not charge you any fees or charges in relation to acting as a credit representative.

### OTHER FEES AND CHARGES

You may have to pay other fees and charges (such as an application fees, valuation fees and other fees) to the lender, lessor or other parties. You should review the disclosure documents and your loan contract or lease for further details of any such fees and charges.

## COMMISSIONS

### COMMISSIONS WE RECEIVE FROM OUR LICENSEE

BLSSA has appointed our Broker Group as its agent to receive commissions from lenders and lessors and to pay us commission in relation to loan contracts or leases for which we act as a credit representative and provide credit assistance. The total amount of

commission we may receive in relation to your loan or lease may vary depending on the lender or lessor, the term, the features, the amount of the loan or lease you ultimately choose and the amount and timing of the repayments that you make.

#### Loan Contracts such as Home Loans, Investment Property Loans

Upfront commission payable by lenders in relation to home loans and investment property loans is calculated as a percentage of the loan amount and is generally in the range of 0.58% and 1.65% of the loan amount. It is usually paid after settlement of the loan.

Trail commission payable by lenders in relation to home loans and investment property loans is generally calculated regularly (monthly, quarterly, bi-monthly or annually) on the outstanding loan balance and is paid in arrears. The trail commission payable by lenders is generally in the range of 0% per annum and 0.25% per annum of the outstanding loan amount.

#### VOLUME BONUS ARRANGEMENTS

We and our Broker Group do not receive any volume-based benefit for residential home loan products. However, from time to time we or our Broker Group may receive a benefit, directly by way of cash bonus or additional commissions or indirectly by way of training, professional development days or sponsorship, if we or our Broker Group write a particular volume of loans offered by lenders for products such as commercial and lease products.

#### COMMISSIONS PAYABLE BY US

If a third party has introduced you to us or referred you to us, we may pay them a commission or a fee. More detail about those payments will be set out in the credit proposal disclosure document we will give to you before we provide you with credit assistance.

We obtain referrals from a range of sources, including real estate agents, accountants, financial planners or other people.

Further information about referral commissions, including our reasonable estimate of the amount of any commission payable and how it is calculated is available from us on request and will be included in the credit proposal disclosure we will supply to you when we provide you with our credit assistance.

## DISPUTES OR COMPLAINTS

### WHAT TO DO IF YOU HAVE A DISPUTE OR COMPLAINT?

We are committed to providing our customers with the best possible service. If at any time we have not met our obligations – or you have a complaint about any of our services – please inform us so we can work towards a resolution. We will endeavour to deal with your complaint promptly, thoroughly and fairly.

### HOW TO MAKE A COMPLAINT AND THE COMPLAINTS PROCESS?

If you have a complaint, we request you follow these steps:

1. In the first instance, please contact your credit assistance provider.
2. If your complaint has not been resolved to your satisfaction within 5 business days, please contact our Complaints Area as detailed below:

**Telephone:** 03 8616 1443 Monday to Friday 9am to 5pm (AEST)

**Email:** [resolutions@BLSSA.com.au](mailto:resolutions@BLSSA.com.au)

**Fax:** 03 8616 1918

**Mail:** BLSSA Advice Complaints, PO Box 626, Collins Street West, Melbourne VIC 3000

3. We may ask for additional information and request you to put your complaint in writing to ensure your issue is properly investigated.
4. In cases where your complaint will take longer to resolve, we will update you progressively.

### THIRD PARTY PRODUCTS OR SERVICES

If your complaint relates to a product or service acquired through a third party (for example, a lender) we may ask you to contact the relevant third party. They will deal with your complaint under their complaints resolution process.

If you are not satisfied with the resolution of your complaint by the third party under their complaints resolution process, you are entitled to have your dispute considered by their External Dispute Resolution Scheme. Please contact the third party for further details.

### KEEPING YOU INFORMED

Our Complaints Area will acknowledge receipt of your complaint within five business days. If unable to resolve the complaint/dispute to your satisfaction within five business

days, they will write to you advising the procedures we will follow in investigating and handling your complaint.

Within 45 calendar days from the date you lodged the complaint with us, we will write to you advising you the outcome of the investigation and the reason/s for our decision, or if required, we will inform you if more time is needed to complete the investigation.

#### STILL NOT SATISFIED?

If you do not think we have resolved your complaint to your satisfaction, you may take the matter – free of charge – to the relevant External Disputes Resolution Scheme (provided it is within the scheme’s terms of reference) as detailed below. You may also refer the matter to the relevant External Disputes Resolution Scheme at any time, but if our internal process is still in progress, they may request that our internal processes be complete before considering the matter further.

Our external dispute resolution service provider is the Australian Financial Complaints Authority (AFCA), which can be contacted via:

- Online: [www.afca.org.au](http://www.afca.org.au)
- Email: [info@afca.org.au](mailto:info@afca.org.au)
- Phone: 1800 931 678
- Mail: GPO Box 3 Melbourne VIC 3001

BLSSA’s external dispute resolution service provider is the Australian Financial Complaints Authority (AFCA), which can be contacted via:

- Online: [www.afca.org.au](http://www.afca.org.au)
- Email: [info@afca.org.au](mailto:info@afca.org.au)
- Phone: 1800 931 678
- Mail: GPO Box 3 Melbourne VIC 3001

#### OTHER DISCLOSURES

##### BROKER BENEFITS DISCLOSURES

In line with industry reforms, I am required to keep a register of benefits received from any lenders or aggregators to the value of \$100 or more which is kept current (over a rolling 12 month period and housed for 3 years). In the interest of transparency and good customer outcomes, an applicant may request a copy of this register to ensure there are no lender conflicts.

##### TIERED SERVICING DISCLOSURES

We have access to service programs available from some residential home loan providers. We access these services based on a number of measures. These programs promote preferential services to a customer and do not entitle us to additional payments or commissions or to preferential customer discounts.

# Privacy Statement

## Choice Aggregation Services and BLSSA Privacy Notice and Consent

This privacy notice and consent relates to personal information Pennley Pty Ltd atf the Pennley Unit Trust ABN 53 348 526 415 (the Aggregator) or BLSSA Pty Ltd ABN 69 117 651 760 (the Licensee) collects or has collected about you.

This privacy notice and consent:

- replaces any prior privacy notice and consent the Aggregator or the Licensee or both issued or took from you; and
- includes consents from you to allow each of the Aggregator and the Licensee to collect certain information about you.

In this privacy notice and consent:

- the mortgage broker, contracted to the Aggregator or the Licensee and with whom you are associated, is referred to as a Broker; and
- the loan consultant, of a Broker and with whom you are associated, is referred to as a Loan Consultant.

### PRIVACY NOTICE

This privacy notice tells you how the Aggregator and the Licensee collect your information, what each of them uses the information for and who each of them share the information with. If either the Aggregator or the Licensee collects information that can be used to identify you, it will take reasonable steps to notify you of that collection.

### How information is collected from you

Each of the Aggregator and the Licensee will collect your information from you directly whenever it can. It obtains most of the information directly from you through requests you or the Broker or the Loan Consultant make of it or requests it makes of any of you, the Broker or the Loan Consultant. Also, it may:

- obtain information from other sources referred to in those requests, if it considers it is reasonably necessary to do so; and
- ask for other information from you from time to time to enable it to improve its services or to review the general needs of brokers, potential brokers, loan consultants, potential loan consultants, credit representatives and potential credit representatives.

Each of the Aggregator and the Licensee may verify that information from sources referred to in requests any of you or a Broker or a Loan Consultant make of it or in this privacy notice and consent.

### **How information is collected from other sources**

Sometimes the Aggregator or the Licensee will collect information about you from other sources as the Privacy Act 1988 permits. It will do this only if it's reasonably necessary to do so, for example, where it:

- obtains information from the Broker or the Loan Consultant;
- obtains information from the police or from ASIC or other government authorities to check your probity and assist it to assess the requests any of you or a Broker or a Loan Consultant make of it;
- obtains information from financial institutions on the Aggregator's panel of financial institutions relating to application conversion ratios, application submission quality and use of online services;
- in the case of the Licensee, obtains information from its insurance broker or the insurer that supplies Group Professional Indemnity Insurance cover to the Licensee's credit representatives relating to a request by you or a Broker or a Loan Consultant to opt in to that cover;
- can't get hold of you and it relies on publicly available information to update your contact details; or
- at your request, exchanges information with your legal or financial advisers or other representatives.

We may collect information about you that is publicly available (for example from public registers or social media), or made available by third parties. We do this where:

- we distribute or arrange products on behalf of others, including our business partners;
- we can't get hold of you and need to update your contact details;
- we need information from third parties about an application you make through us;
- we need information for fraud prevention purposes;
- we are checking the security you are offering;
- we can learn insight about your financial needs, such as through property information;
- you have consented to third parties sharing it with us, such as organisations we sponsor or have loyalty programs with; or
- at your request, we exchange information with your legal or financial advisers or other representatives.

We may use or disclose information about you in order to combine the information that we hold about you with information about you collected from or held by external sources.

### **When the law authorises or requires collection of information**

There are laws (like the National Consumer Credit Protection Act) that affect organisations that may require each of the Aggregator or the Licensee to collect personal information about you.

### **How your information may be used**

The Aggregator or the Licensee may use your information for purposes relating to:

- processing requests you make of it;
- managing and better understanding its relationship with you or the Broker or the Loan Consultant including tracking and making payments due to you or the Broker or the Loan Consultant;
- managing its relationship with financial institutions on the Aggregator's panel of financial institutions;
- identifying opportunities to improve our service to you and improving our service to you;
- allowing it to run its business efficiently and to perform administrative and operational tasks;
- preventing or investigating any fraud or crime or any suspected fraud or crime;
- assisting in improving industry standards relating to engaging in credit activities;
- assisting it to recover amounts payable by you or the Broker or the Loan Consultant to it;
- telling you about other products or services it or its related companies make available and that may be of interest to you, unless you tell it not to;
- as required by law, regulation or codes binding it; and
- any purpose to which you have consented.

You can let the Aggregator or the Licensee know at any time if you no longer wish to receive direct marketing offers from it. It will process your request as soon as practicable.

### **What happens if you don't provide information**

If you don't provide your information to the Aggregator or the Licensee, it may not be possible for it to:

- consider a request you or a Broker or a Loan Consultant make of it; or
- provide other services to you or the Broker or the Loan Consultant.

### **Sharing Your Information**

#### Sharing with related companies

Each of the Aggregator and the Licensee may share your information with its related companies for any of the purposes described above. Where appropriate we integrate the information we hold across the National Australia Bank Group (NAB Group), of which we are a member, to provide us with a complete understanding of you and your needs.

#### Sharing with your representatives and referees

Each of the Aggregator and the Licensee may share your information with:

- your representative or any person acting on your behalf (for example, lawyers or accountants); and

- your referees to make reasonable enquiries with respect to a request you or the Broker or the Loan Consultant make of it and any services related to that request.

#### Sharing with third parties

The Aggregator or the Licensee may share information about you with third parties, in relation to: considering a request you or the Broker or the Loan Consultant make of it; administering its arrangements with you or the Broker or the Loan Consultant; or any other purpose noted above. Those third parties may include:

- the Broker or the Loan Consultant;
- financial institutions on the Aggregator's panel of financial institutions;
- other participants in the mortgage industry or with industry bodies of which the Aggregator or the Licensee is a member for general information or to assist with improving industry standards relating to engaging in credit activities;
- lender's mortgage insurers or title insurers;
- in the case of the Licensee, its insurance broker or the insurer that supplies Group Professional Indemnity Insurance cover to the Licensee's credit representatives, but only if you or the Broker or the Loan Consultant are considering opting in, or have opted in, to that cover;
- authorities that issue documents you give us to identify you to enable us to verify the status of, and any information contained in, the document;
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- government or regulatory bodies (including the Australian Securities and Investments Commission and the Australian Tax Office) as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- ratings agencies, but only to the extent necessary to allow the ratings agency to rate particular investments;
- companies we arrange or distribute products for;
- our joint venture partners that conduct business with us;
- organisations that wish to take an interest in the Aggregator's or the Licensee's business or assets;
- organisations involved in a corporate re-organisation or transfer of NAB Group assets or business;
- payment system operators, but only to the extent necessary to investigate or correct payments made by the Aggregator or the Licensee to you or the Broker or the Loan Consultant or payments you or the Broker or the Loan Consultant make to either the Aggregator or the Licensee;
- other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors or lawyers and other external advisers (e.g. consultants and any independent customer advocates);
- service providers, agents, contractors and advisers that assist it to conduct its business; and
- where you've given your consent or at your request, including to your representatives or advisors.

Also, each of the Aggregator or the Licensee may disclose your information, in relation to other services it provides under its arrangements with you or the Broker or the Loan Consultant, to others including:

- organisations that maintain, review and develop its business systems, procedures and technology infrastructure, including testing or upgrading their computer systems;
- organisations that assist it with product planning, analytics, research and development; and
- mailing houses and telemarketing agencies and media organisations that assist it to communicate with you, including media or social networking sites.

#### Sharing outside of Australia

The Aggregator or the Licensee may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

#### **Accessing your Information**

You can ask the Aggregator or the Licensee to access information it holds about you. You can find out how to access your information by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the Aggregator or the Licensee using the contact details in the schedule.

#### **Correcting your Information**

You can ask the Aggregator or the Licensee to correct information it holds about you. You can find out how to correct your information by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the Aggregator or the Licensee using the contact details in the schedule.

#### **Complaints**

If you have a complaint against either the Aggregator or a Licensee about a privacy issue, please tell them. You can find out how to make a complaint and how the Aggregator or the Licensee will deal with a complaint by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the Aggregator or the Licensee using the contact details in the schedule.

#### **Privacy Policy**

You can find out more about how each of the Aggregator and the Licensee manages your information by reading the Aggregator's Privacy Policy or the Licensee's Privacy Policy (as the case may be), available by contacting the Aggregator or the Licensee using the contact details in the schedule. Also, you can read and obtain a copy of that policy at their website address set out in the schedule.

#### **Information about other people**

If you give information to the Aggregator or the Licensee about another person (like your loan writers or referees or the Broker or the Loan Consultant) in relation to a request you make of it, you will let that other person know that:

- the Aggregator or the Licensee has collected their information to assess that application, to manage its relationship with you or the Broker or the Loan Consultant or for any other purpose set out in the privacy notice above;
- the Aggregator or the Licensee may exchange this information with other organisations set out in that privacy notice;
- the Aggregator or the Licensee handles their personal information in the way set out in its Privacy Policy and this privacy notice and consent and they can:
  - access or request a copy of that Privacy Policy or this privacy notice and consent; or
  - access the information the Aggregator or the Licensee holds about that other person,by using the contact details for the Aggregator or the Licensee (as the case may be) set out in the schedule; and
- the Aggregator or the Licensee may not consider the request you make of it, unless it obtains their information.

### **Consent**

You consent to each of the Aggregator and the Licensee:

- collecting information about your membership of a mortgage industry association; and
  - collecting information about criminal records relating to you,
- when you give it that information in a request you make to it or following a request it makes of you.

### **SCHEDULE**

Pennley Pty Ltd atf the Pennley Unit Trust ABN 53 348 526 415

The Privacy Officer

Advantedge Financial Services Pty Ltd

Level 10, 101 Collins Street

Melbourne Vic 3000

Telephone: 03 8616 1600

Email address: [privacyofficer@advantedge.com.au](mailto:privacyofficer@advantedge.com.au)

Our privacy policy is set out at

<http://www.choiceaggregationservices.com.au/general/Privacy.asp>

BLSSA Pty Ltd ACN 117 651 760

The Privacy Officer

Advantedge Financial Services Pty Ltd

Level 10, 101 Collins Street

Melbourne Vic 3000

Telephone: 03 8616 1600

Email address: [privacyofficer@advantedge.com.au](mailto:privacyofficer@advantedge.com.au)

Our privacy policy is set out at [www.advantedge.com.au/privacy](http://www.advantedge.com.au/privacy)

