

EFT CAPITAL PRIVACY POLICIES

1. GENERAL PRIVACY POLICY

1. Introduction

Viva Unity P/L ATF Coetzee Group Trading Trust T/A EFT Capital (“we”/”us”/”our”) endeavour at all times to comply with the Privacy Act 1988 and the Australian Privacy Principles which together will be referred to in this policy as “Australian Privacy Law.”

This **General Privacy Policy** applies to all persons accessing our website, dealing with us or from whom we otherwise collect personal information. We also collect personal and credit information provided by persons applying for or receiving credit from us and, in doing so, endeavour at all times to comply not only with Australian Privacy Law, in general, but also with the Credit Information Privacy Code. All persons who apply for or receive credit from us or you agree to guarantee another person’s credit from us, will be further protected by our **Credit Information Privacy Policy**.

Any person who receives credit from us and applies to vary the terms of the payments on the grounds of hardship will be additionally protected by our **Hardship Privacy Policy**.

2. Pseudonyms

You are not required to provide us with your name or any personal information if you do not wish to. You are free to use any name allowed by law. We, however, will not deal further with you without obtaining your real name and other verifiable pieces of personal information.

We are not permitted by law to provide you with credit without obtaining proof of your identity and that is covered in our Credit Information Privacy Policy.

3. The kinds of personal information we collect

By accessing this website or otherwise dealing with us you agree to our General Privacy Policy in relation to the collection of personal information by the website.

As a result of your visit to our website, we may collect and store information about your visit to this website including:

- the domain name and IP address of the computer from which you accessed the internet;
- the date and time you accessed the website;
- the internet address of the website from which you linked directly to our website;
- the pages you accessed while visiting the website; and
- through the use of websites, software and internet tracking devices such as cookies, anonymous identifiers and session variables, we may also collect your email address

Your internet service provider or the providers of your internet browser software may also collect such information for their own purposes. We are not responsible for the collection, storage and use of such information by these entities and refer you to their respective privacy policies.

As a result of you dealing further with us, whether as a prospective customer, an actual customer, guarantor and prospective guarantor, contractor, supplier or service provider, we may collect and store personal information from you such as:

- your name;
- address, previous addresses and how long you have lived at those addresses;
- date of birth;
- your employer, previous employers and how long you have been in such employment;
- your email address;
- your telephone numbers; and
- the details of any references you supply, including the names and addresses of your referees.

If you apply to us for credit we will collect and store credit information in addition to the above personal information and this will be governed by our Credit Information Privacy Policy.

If you receive credit from us and you apply to us to vary your payment arrangements under your credit contract due to hardship, you may supply us with sensitive information in addition to the above personal information and other credit information and this will be governed by our Hardship Privacy Policy.

If you apply to us for employment, we may also collect and store personal and, in addition, sensitive information about you including your:

- education, training and other qualifications;
- work history;
- professional or trade associations or union membership;
- hobbies and other interests; and
- criminal history.

4. How we collect your personal information

We may collect personal information about you from your visit to our website through the use of technologies such as anonymous identifiers, session variables, and cookies. You may be able to set your internet web browser to block or limit cookies. Some features of our website may not work as efficiently or not at all if you have done so.

As a result of you dealing further with us, we may collect personal information directly from you and this may be in person, over the telephone, by mail, over the internet, by email or fax or by completion of an application or consent form whether on-line or otherwise.

If you:

- apply to us for credit;
- agree to guarantee credit from us to another person;
- receive credit from us;

- apply to us to vary the terms of your payments under your (consumer) credit contract on the grounds of hardship; or
- apply for employment with us;

we may collect personal, credit and sensitive information about you from other sources when it is impractical or unreasonable for us to collect it directly from you. Among these other sources may be:

- a credit reporting body;
- government data verification systems
- someone authorised by you such as an agent, broker, accountant, solicitor, financial counsellor, introducers or a guarantor;
- a referee;
- an employer;
- a government body;
- another financial institution;
- a professional or trade association or trade union
- our agents.

and we may collect that information directly from them in person, over the telephone, by mail, over the internet, by email or fax or by completion of an application or consent form whether on-line or otherwise.

5. How we hold your personal information

We use our best endeavours and take all reasonable steps to secure your personal information including:

- maintenance of a secure environment for storage of information whether in hard copy or in electronic form;
- requiring that access to such information be confined to authorised personnel only;
- using technology such as encryption and password protection to secure any information kept in electronic form.

We are not responsible for the security of any computer or other device which you use to access our website.

6. The purposes for which we collect, hold, use and disclose your personal information

If you are a user of our website, a prospective customer, a customer or guarantor of a customer's credit, a contractor or supplier of goods and services to us, a job applicant or other person from whom we collect we collect, hold, use and disclose your personal information we shall do so only for those purposes which are:

- permitted by Australian Privacy Law;
- necessary for:
 - the administration of any contract of supply of goods or services to or by us;

- the provision of our products to our customers;
- the consideration, assessment and administration of any proposed guarantee of credit;
- assessment and processing of any job application;
- otherwise for the administration and management of our business;
- for the improvement of website useability;
- required by law;
- required in order to investigate or assist with any investigation into any complaint about the conduct of our business, in particular, under Australian Privacy Law;
- to otherwise enforce any term of any contract or other right which arises out of our dealings with you.;
- to communicate with you, by way of direct marketing, information about our products and
- service. If you do not wish us to do so, you can “opt out” of such communication by informing us in
- person, by telephone, by facsimile, by post or by email;
- to search and/or register any Personal Property Securities;
- necessary as part of a prospective sale, transfer or restructure of our business; or
- to otherwise communicate with you or the purposes outlined above.

In addition, if you apply to us for credit or receive credit from us, we will collect, hold, use and disclose your personal information in order to:

- assess your credit application including that of any proposed guarantor;
- manage your credit contract;
- consider any application for variation of your payments whether or not on the grounds of hardship;
- collect any debt or otherwise enforce any rights arising under your consumer credit contract.

To find out more on how we deal with your credit information or sensitive information if you apply to us for credit or receive credit from us, please see our Credit Information Privacy Policy.

We may disclose your personal information, including credit and sensitive information, to other parties as part of a process of merger, acquisition, sale of our business or our other assets and, before doing so, will give you notice and an opportunity to opt out of the provision of such information in that instance

If, for any of the above purposes, we disclose your personal information to any supplier of services to our business or to any prospective purchaser of our business which we shall do so only if it is necessary for the purposes listed above, we shall:

- do so in accordance with Australian Privacy Law;

- obtain assurances from those suppliers that they comply with Australian Privacy Law.

7. Whether we supply your personal information to overseas recipients

We supply your personal information to overseas recipients as part of our information technology systems. Those recipients are likely to be in the following countries: The United States of America

8. How you may access your personal information held by us

You may request access to your personal, sensitive and credit information held by us by identifying yourself in person, by facsimile or by scanned attachments to an email and sending your request for access to us at:

EFT Capital (charl@eftcapital.com.au)

If we are unable to grant your access to personal, sensitive or credit information, we will give you our reasons in writing within a reasonable time. These may include where providing the information to you may:

- reveal personal information about another individual person;
- pose a threat to the health or safety of another individual person;
- not be permitted by law;
- reveal internal information of a commercially sensitive nature which is not required to be disclosed to you by Australian Privacy Law.

9. How you may correct any personal information we hold about you which is incorrect

If you believe any personal information which we hold about you is incorrect, please contact us in person by telephone, by facsimile, by email, identify yourself and tell us what information which we hold about you is, in your belief, incorrect and how you want it changed.

If we cannot agree to the change to the information which you have requested, we will give you reasons in writing.

10. How you may complain about how we deal with your personal information

If you are not satisfied with the reasons referred to above or otherwise have any complaint about how we collect, hold, use or disclose your personal information please contact our Privacy Officer who will then follow our Privacy Internal Dispute Resolution process.

Our Privacy Officer can be contacted by email on charl@eftcapital.com.au and by telephone on 1300 722 744 or by post PO Box 325, Broadbeach, QLD 4218

If you are not satisfied with our Privacy Internal Dispute Resolution process, you may refer your complaint to our External Dispute Resolution Scheme.

Our External Resolution Scheme is:

Australian Financial Complaints Authority

GPO Box 3
Melbourne, VIC 3001
Tel: 1800 931 678
Fax: 03 91613 6399
Website: <https://www.afca.org.au/>

You can, of course, at any time, refer directly to:
The Office of the Australian Information Commissioner
GPO Box 2999
CANBERRA ACT 2601
Tel: 1300 363 992
Fax: 02 9284 9666
Website: www.oaic.gov.au

11. Changes to this Policy

From time to time, we may make changes to this General Privacy Policy because of:

- changes to the law;
- changes to technology;
- changes to our systems

We will notify such changes on our website. Where the changes may affect you in a particular way, and you have a (consumer) credit contract with us, we will notify you if required by Australian Privacy Law and our Credit Information Privacy Policy.