



# Privacy Policy

## HOW WE TREAT YOUR PERSONAL INFORMATION

### Who are we?

'We', 'us', 'our' and 'Group' refer to Think Smart Group Pty Ltd ACN 125 918 710, trading as Aspire Financial Group PTY LTD ABN 619 811 464 89. Authorised Representative of Finsure Finance and Insurance Pty Ltd ABN 72 068 153 926 Australian Credit Licence 384704; Axies Pty Ltd , Australian Financial Services Licence 339384; and our related businesses.

### Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law.

### Personal information

When we refer to personal information we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The type of personal information we may collect can include (but is not limited to) name, address, date of birth, contact details, income, expenses, assets and liabilities, account balances, tax, bank and financial statements, social security details, identification documents, insurance, employment details and any other information we consider necessary.

If you are applying for finance the personal information we hold about you may also include credit information. Credit information is information which is used to assess your eligibility to be provided with finance and may include the ages and number of your dependants and



cohabitants, as well as the length of time at your current address, any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

If you are applying for insurance we may also collect information that relates to a person's racial or ethnic origin, sexual preferences or activities, criminal record, state of health and medical history.

If we are assisting you with investments, superannuation or providing financial planning advice we will also collect information in relation to your existing investment and superannuation products.

### **Sensitive Information**

We may also collect sensitive information which relates to a person's racial or ethnic origin, membership of political bodies, religions or trade unions, sexual preferences or activities, criminal record, state of health and medical history. These pieces of information are usually needed for applications for personal insurance and to manage claims on those products. It may also be relevant to credit and other applications. It is our policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the customer agrees otherwise or the use of disclosure of this information is allowed by law. Documents asking for sensitive information will explain this. We will only collect sensitive information about you with your consent.

The way we use tax file numbers (TFN) and information received from a credit reporting agency about an individual is also restricted by law.

The Privacy (Tax File Number) Rule 2015 (TFN Rule) states that TFN information must only be collected, retained or disclosed by TFN recipients for a purpose authorised by taxation law, personal assistance law or superannuation law. A breach of the TFN Rule is an interference with privacy under the Privacy Act.

It is not an offence if you do not give us your TFN, however sometimes there may be a financial consequence (e.g. it may affect the tax rate applied against investments).

### **Why we collect your personal information**

Our business is to understand and meet our customer's need over their lifetime for a wide range of financial and other services. By law, we cannot provide advice without fully knowing and understanding your personal and financial circumstances. To do this effectively, we need to collect your personal information. We may also collect your personal information for the



purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

## **Direct marketing**

From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 03 9397 4000 or by writing to us at PO Box 524, Williamstown, Vic 3016. If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

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

In most cases, your personal information will be collected when you meet with our representative, provide your information via telephone or electronic and written material. In some instances, your information may also need to be collected from third parties such as your accountant, mortgage broker or solicitor.

## **Management and storing of personal information**

Aspire Financial Group trains its employees, representatives and their staff who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy seriously and will impose appropriate penalties, including dismissal.

We hold personal information in a combination of secure computer storage facilities and paper-based files, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

## **Access, update and correction to your personal information**

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge a fee for our costs of retrieving and supplying the information to you.



Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you. If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct or update the information. If appropriate we will correct or update the personal information at the time of the request; otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected or updated the personal information within 30 days.

We may need to consult with other entities as part of our investigation. If we refuse to correct or update personal information we will provide you with our reasons for not correcting the information.

### **Do we disclose your personal information?**

We are committed to being open about how we use personal information. Your personal information will be collected and held by Authorised & Credit Representatives, Staff and related body corporates of the Think Smart Group Pty Ltd and Finsure. We may disclose your personal information as follows:

- ❖ to other areas within the Group who provide financial and other services;
- ❖ Financial institutions, funders or other intermediaries for the provision of financial products such as mortgages, deposit bonds, investments, superannuation and life insurance
- ❖ to Financial Advisers, brokers and those who were authorised by Aspire Financial Group and Finsure to review customer's needs and circumstances from time to time;
- ❖ to any of our associates, service providers, aggregators, licensees, technology providers, related entities or contractors, specialist advisers who have been contracted to provide us with administrative, financial, insurance, accounting, legal, information technology, research or other services;
- ❖ to associated businesses that may want to market products to you;
- ❖ to companies that provide information and infrastructure systems to us;



- ❖ any person or entity who represents you including financial consultants, accountants, lawyers, mortgage brokers, persons holding power of attorney, guardians and advisers;
- ❖ to anyone, where you have provided us consent;
- ❖ to other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- ❖ other guarantors or borrowers (if more than one) or borrowers or prospective borrowers of any credit you guarantee or propose to guarantee;
- ❖ your referees, such as your employer, to verify information you have provided;
- ❖ to credit reporting or reference or identity verification agencies or insurance investigators or your employer;
- ❖ where we are authorised to do so by law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), to government and law enforcement agencies or regulators;
- ❖ to investors, agents or advisers, or any entity that has an interest in our business; or
- ❖ to organisations in connection with the sale or proposed sale of all or part of
- ❖ Aspire Financial Group and Finsure and/or representative's business and to the use of that personal information by those organisations for those purposes.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- b) you have consented to us making the disclosure.

### **What we collect via your online activity**

We collect most personal information directly from you. We may also collect information from you electronically, for instance, when you visit our website. If you're an internet customer of ours, we monitor your use of internet services to ensure we can verify you and can receive information from us, and to identify ways we can improve our services for you. Your internet protocol address (or "IP address") is the numerical identifier from your device when you are using the internet. It may be necessary to collect your IP address for your interaction with some parts of our website.



Sometimes we may send your information overseas, including to

- ❖ Service providers or 3rd parties who store data or operate outside Australia,
- ❖ Comply with law, and assist government or law enforcement agencies.

If we do this, we make sure there are arrangements in place to protect your information.

We may confidentially disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities, if relevant, by contacting us.

## **Business without identifying you**

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

## **Credit Reporting Information**

We may, on your authority, request a Credit Report from one of the Credit Reporting Agencies on your behalf. Credit Reports provide information on your previous Credit history and may prove useful in determining the lender more suited to your circumstances. A credit report gives us information about your credit history. Credit reports are provided by credit reporting bodies who collect and share credit information with credit providers and other service businesses like phone companies. The Privacy Act limits the information we can give to credit reporting bodies, and that they can give us.

The credit reporting body we use is Equifax Pty Ltd. You can download a copy of their privacy policy at [Equifax.com.au/privacy](https://www.equifax.com.au/privacy)

We use information from credit reporting bodies to confirm your identity, assess your ability to manage credit, and manage our relationship with you. A copy of the Credit Report will be made available on your request.

## **Complaints**

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our Privacy Officer on 03 9397 4000 or by email to [infor@aspirefg.com.au](mailto:infor@aspirefg.com.au)



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

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

### **Further information**

You may request further information about the way we manage your personal information by contacting us.

### **Change in our Privacy Policy**

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy policy from time to time or as the need arises. You may request this privacy policy in an alternative form.