Privacy and Credit Reporting Policy

This policy sets out how we collect, use and disclose the personal information (including credit-related information) we hold about you.

Who are we?

Throughout this policy, any reference to '**we**', '**us**' and '**our**' refers to WPF Finance (Empower Money Pty Ltd) ACN 678 964 853, Australian Credit Licence 561207, our related businesses and related bodies corporate.

Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our commitment in respect of the personal information (including credit-related 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 for 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 (APPs) and Part IIIA of the *Privacy Act 1988 (Cth)*, the *Privacy (Credit Reporting) Code 2014* 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 personal information we hold about you may also include credit-related information.

Credit-related information means:

- ***Credit information***, which is information which includes 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*, financial hardship information (including information that any repayments are affected by a financial hardship arrangement), *default information* (including overdue payments); payment information; new arrangement information; details of any serious credit infringements; court proceedings information; personal insolvency information and publicly available information; and

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

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

The kinds of personal information we may collect about you include your name, date of birth, address, account details, occupation, and any other information we made need to identify you. When you visit our website or use our mobile apps, we may collect information about your location and activities. This can include your IP address, phone number, visits to third-party sites, the date and time of your visits, the pages you view, and details about the device you use. Some of this data is gathered through cookies and other digital tools.

If you are applying for finance or provide a guarantee we may also collect the ages and number of your dependants and cohabitants, the length of time you have resided at your current address, your employment details and proof of earnings and expenses. If you apply for any insurance product through us we may collect information about what is being insured, the beneficiaries and your health information including medical and lifestyle information from you or your health professionals. We will only collect health information from you with your consent.

Why we collect your personal information

We collect personal information for the purposes of assessing your application for finance and managing that finance, establishing your identity, contacting you, managing our risk and to comply with our legal obligations. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. Improvements in technology also enable organisations like ours to collect and use information to get a more integrated view of our customers. From time to time we may offer you other products and services.

How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. 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 may also collect your personal information from credit reporting bodies, mortgage and finance brokers, employers and other people such as accountants and lawyers.

We will never request that you provide personal information publicly on Facebook, Twitter, or any other social media platforms we use.

Do we disclose your personal information?

We may disclose your personal information:

- to prospective funders or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres, lenders, mortgage insurers, trade insurers and credit reporting bodies;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to our agents, contractors, external service providers to outsource certain functions, for example, statement production, debt recovery and information technology support;
- to anybody who represents you, such as finance brokers, real estate agents, lawyers, mortgage brokers, guardians, persons holding power of attorney and accountants;
- to anyone, where you have provided us consent;
- to other guarantors or borrowers (if more than one);
- to borrowers or prospective borrowers including in relation to any credit you guarantee or propose to guarantee
- to our auditors, insurers, re-insurers and health care providers;
- to claims related providers, such as assessors and investigators who help us with claims;
- where we are authorised to do so by law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), government and law enforcement agencies or regulators;
- to investors, agents or advisers, trustees, rating agencies or any entity that has an interest in your finance or our business;
- to other financial institutions, for example to process a claim for mistaken payment;
- organisations that provide products or services used or marketed by us; or
- to your employer, former employer, referees or identity verification services.

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.

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.

This credit-related information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store the credit-related information we hold about you. 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.

We may disclose your credit-related information to overseas entities that provide support functions to us (including Philippines and South Africa). You may obtain more information about these entities by contacting us. Where we do this, we make sure appropriate data handling and security arrangements are in place.

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 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 or your capacity to be a guarantor and manage your finance.

The information we can exchange 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, whether you have entered into a financial hardship arrangement (either with us or some other third party) 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. Please see the heading 'Access and correction to your personal and credit-related information', below.

Sometimes your credit information will be used by credit reporting bodies for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your credit 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 the credit reporting body must not use or disclose that credit information. You can contact any of the following credit reporting bodies for more information:

- Equifax Pty Ltd – www.equifax.com.au,
- Illion (Australia) Pty Ltd – www.illion.com.au, or
- Experian Australia Credit Services Pty Ltd – www.experian.com.au

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 1300 002 123 or by writing to us at support@wpffinance.com.au. 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.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

Access and correction to your personal and credit information

We will provide you with access to the personal and credit-related 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 or credit-related information, for example, if the information relates to existing or anticipated legal proceedings, if your request is vexatious or if the information is commercially sensitive.

An explanation will be provided to you, if we deny you access to the personal or credit-related information we hold about you.

If any of the personal or credit-related information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information by telephoning us on 1300 002 123 or by writing to us at support@wpffinance.com.au.

If appropriate we will correct 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 the personal or credit-related information within 30 days.

We may need to consult with other finance providers or credit reporting bodies or entities as part of our investigation.

If we refuse to correct personal or credit-related information we will provide you with our reasons for not correcting the information.

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.

Sensitive information

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

How safe and secure is your personal information that we hold?

We will take a range of measures and reasonable steps to protect your personal information. Your personal information will always be stored in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

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 and the Credit Reporting Code, you may contact our complaints officer by telephoning us on 1300 002 123 or by writing to us at support@wpffinance.com.au.

We will acknowledge your complaint within seven days and aim to resolve the complaint as quickly as possible. 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 our External Dispute Resolution Scheme, the AFCA scheme which can be contacted on 1800 931 678 or the Privacy Commissioner which can be contacted on either www.oaic.gov.au or 1300 363 992.

Further information

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

Change in our privacy and credit reporting 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 marketplace practices.

As a consequence we may change this policy from time to time or as the need arises. We will post any changes to this policy on our website.

You may request this policy in an alternative form by telephoning us on 1300 002 123 or by writing to us at support@wpffinance.com.au.

This privacy and credit reporting policy came into existence on 01/09/2025.