



Privacy Policy

This Privacy Policy covers Holman Hodge Pty Ltd ACN 606 684 495 and Holman Hodge Financial Services Pty Ltd ACN 611 203 199 (the Group).

In this Privacy Policy, "us", "we" or "our" means each member of the Group.

We understand that the privacy of your personal information is important to you. This Privacy Policy explains how we handle your personal information. It also explains how we manage your credit information.

By providing your personal or credit information to us, you consent to us collecting, using and disclosing your personal and/or credit information in accordance with this Privacy Policy.

We may change this Privacy Policy from time to time by publishing changes to it on our website. Please check our website regularly to ensure that you are aware of any changes to this Privacy Policy.

What is personal and credit information?

Personal information is information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, email address and contact details.

Credit information is personal information that is collected in connection with a credit application. For example, this may include ID information, default information or repayment history information.

What personal and/or credit information do we collect?

The information we may collect from you and hold includes:

- Identity information – including your name, address (postal or email), date of birth, telephone numbers, information about your dependents or family members.
- Financial details – including your tax file number and other information about your financial affairs.
- Other personal information such as details of your interactions with us.

We may collect these types of information either directly from you or from third parties. We may collect information when you:

- Use our website
- Communicate with us through phone calls, correspondence, email or when you share information with us from other social applications, services or websites or
- Fill out a form with us (including electronically).

We may collect information about you from others such as:

- Agents or
- Brokers.

Why do we collect, use and disclose information?

We may collect, hold, use and disclose your personal and credit information for the following purposes:

- to provide you with information and products and services, including advice
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you
- to send you marketing and promotional messages and other information that may be of interest to you
- to enable you to access and use our website and services
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties and
- for any purpose related to the above.

If you do not provide us with the personal or credit information we request, we may not be able to provide you with the services you have requested.

Do we use your personal information for direct marketing?

We may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (eg an unsubscribe link).

To whom do we disclose your personal information?

We may disclose personal and credit information for the purposes described in this Privacy Policy to:

- members within the Group
- third party suppliers and service providers (including providers for the operation of our websites and/or our business [including cloud service providers] or in connection with providing our products and services to you)
- payment systems operators
- specific third parties authorised by you to receive information held by us and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

Do we disclose personal information outside Australia?

We may disclose personal information outside of Australia to compliance service providers, cloud service providers, storage providers and accounting software providers located in India and Vietnam.

We will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

Using our website and cookies

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

How do we keep your information safe?

We may hold your personal and credit information in either electronic or hard copy form. We take reasonable steps to protect your information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example we:

- train our staff about how to keep your information safe and secure;
- have firewalls, intrusion detection and virus scanning tools to stop viruses and unauthorised access to our systems;
- have building security measures in place;
- destroy and de-identify data when it is no longer required.

However, we cannot guarantee the security of your information.

Links

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

Accessing or correcting your information

You can access the personal and credit information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your information.

If you think that any information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Do we disclose information to credit reporting bodies?

We do not disclose any of your credit information to credit reporting bodies including for the purpose of requesting a credit check on you.

Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal or credit information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

If you are not satisfied with how we have dealt with your complaint you can contact the Office of the Australian Information Commissioner using any of the following details:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
www.oaic.gov.au

Contact Us

For further information about our Privacy Policy or practices, or to access or correct your information, or make a complaint, please contact us using the details set out below:

Privacy Officer: Amanda Powers
T: 08 7099 5030
E: amanda@holmanhodge.com.au
A: Level 5, 420 King William Street Adelaide SA 5000

Effective: December 2017