

Privacy Policy

Internal Policy Document

Guildfords Privacy Policy

1. Your Privacy is Important

At Guildfords your right to privacy is important. Guildfords is subject to the National Privacy Principles (“NPPs”) under the Privacy Act 1988 (C’t). The following statement outlines how Guildfords manages personal information that it holds about individuals in accordance with the NPPs.

This Policy also includes our credit reporting policy, that is, it covers additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information below as “credit information”.

2. Personal Information – what is it?

Personal information is any information or an opinion about you (whether true or not) from which Guildfords can determine your identity. The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- financial details such as your tax file number; and
- other information which we think is necessary.

It will be information collected by Guildfords as part of its procedures to identify you. This forms part of the procedures adopted by Guildfords that conform to AUSTRAC’s anti money laundering (AML) and Counter Terrorism Financing (CTF) procedures.

3. Sensitive Information – what is it?

When personal information concerns certain matters it is considered sensitive information. It is information or opinion about your:

- racial or ethnic origin;
- political opinion;
- membership of a political association;
- religious beliefs, affiliations or philosophical beliefs;
- membership of a professional or trade association or membership of a trade union;
- criminal record;
- financial records.

Guildfords will only collect, use or disclose sensitive information about you in accordance with the law. In most cases, Guildfords will only collect, use or disclose sensitive information where it has received your consent.

4. How your information will be collected

Generally, Guildfords collects personal information directly from you. For example, it collects personal information when you:

- deal with Guildfords in person, by telephone, letter, fax or email;
- supply a resume;
- submit any other information in connection with your application for registration.

Personal information about you may also be collected from a third party. For example, when Guildfords receives:

- Any credit information about you. The main sources of credit information are:
 - your co-loan applicants or co-borrowers;
 - your guarantors/proposed guarantors;
 - your employer, accountant, real estate agent or other referees;
 - your agents and other representatives like the person who referred your business to us, your solicitors, conveyancers and settlement agents;
 - organisations that help us to process credit applications;
 - organisations that check the security you are offering such as valuers;
 - bodies that issue identification documents to help us check your identity; and
 - our service providers involved in helping us to process any application you make for credit through us.
- any reference about you;
- results of inquiries of former employers, work colleagues, professional associations or registration body;
- the results of any competency or medical test;
- performance feedback (whether positive or negative);
- any complaint from or about you in the workplace;
- any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved.

If Guildfords does not have your prior consent, it will take reasonable steps to inform you that it has collected personal information from a third party and ensure you are aware of the purposes for which Guildfords has collected your personal information.

If you don't provide your information to us, it may not be possible for us to give you the assistance you seek, to verify your identity or protect against fraud or to let you know about other products or services that might be suitable for your financial needs.

5. How Guildfords may use and disclose your personal information

Guildfords may use and disclose the personal information it collects about you for the following purposes:

- for purposes for which you have engaged Guildfords.

Guildfords may disclose some of your personal information to:

- Regulatory bodies and/or clients of Guildfords;
- referees;

Guildfords may also disclose your personal information to a third party if they have a proper interest in the disclosure, such as:

- other members of the Guildfords Group;
- Guildfords' insurers;
- a professional association or registration body;
- the mortgage aggregator through whom we may submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel;
- referrers that referred your business to us;
- valuers;
- lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries;
- organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;
- government or regulatory bodies (including ASIC and the Australian Tax Office) as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- guarantors and prospective guarantors of your loan or lease;
- service providers, agents, contractors and advisers that assist us to conduct our business;
- any organisation that wishes to take an interest in our business or assets; and
- any third party to which you consent to us sharing your information.

If Guildfords engages a third-party contractor to perform services which involves handling personal information, it takes reasonable steps to prohibit the contractor from using personal information except for the purposes for which it was supplied.

If you do not give Guildfords the information it seeks, it is unable to provide you with services.

6. Security of your personal information

Guildfords holds personal information in a combination of secure computer storage facilities and paper-based files. Guildfords has security procedures in place to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure. Guildfords uses a number of processes to protect your personal information including:

- locks and security systems;
- computer pass words and limited access to shared network drives to authorised staff;

- virus checking;
- auditing procedures and data integrity checks;
- recording of file movements;
- security classification to identify information needing special protection.

Guildfords will keep your personal information no longer than necessary. Guildfords will appropriately dispose of your personal information so that it is protected from unauthorised use or disclosure.

7. You can request access to your information

You may request access to any personal information Guildfords holds about you, subject to the Privacy Act. Your request to obtain access will be dealt with in a reasonable time. Guildfords may charge a fee to cover the reasonable costs of retrieval and supply of the information to you. Guildfords is not always required to provide you with access to your personal information on request. Guildfords may refuse your access to personal information in a number of circumstances, such as where denying access is required or authorised by law or where the request is vexatious or frivolous.

If Guildfords denies your request for access it will provide you with reasons for the refusal.

8. Keeping your personal information up to date

Guildfords takes reasonable steps to ensure that your personal information is accurate, complete and up to date. Guildfords may also contact you from time to time to check that the information is still correct.

If you are able to establish that personal or sensitive information Guildfords holds about you is not accurate, complete and up to date, Guildfords will take reasonable steps to correct it.

If Guildfords is unable to agree that the personal information it holds about you is accurate, complete and up to date, you may ask Guildfords to place with the information, a statement by you claiming that the information is not accurate, complete and up to date.

9. Transfer of your personal information outside Australia

Guildfords does not transfer your personal information outside Australia unless it is authorised to do so by law or you have consented to it as part of the recruitment services it provides to you. Guildfords may store your personal information on a server overseas. By providing personal information via Guildfords' website you agree your information may be transferred to servers located overseas.

10. How do you make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us.

You can contact us by using the details below:

Dr Robert Payne – Managing Director
Phone: 03 9663 5355
Address: Level3, 175 Collins Street, Melbourne VIC 3000

We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days.

11. Need more help?

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Australian Financial Complaints Authority Limited:

- Online: www.afca.org.au
- Phone: 1800 931 678
- Email: info@afca.org.au
- Mail: GPO Box 3, Melbourne Australia 3001

12. Contact Us

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by using the details below:

Dr Robert Payne – Managing Director
Phone: 03 9663 5355
Address: Level 3, 175 Collins Street, Melbourne VIC 3000

13. Changes to this Privacy Policy

This Policy may change. Guildfords reserves the right to amend or modify this statement from time to time. We will let you know of any changes to this Policy by posting a notification on our website, correspondence via post or e-mail, or you may contact us for a copy of the most up to date policy at any time.