



CLHGroup

# Privacy Policy

## DOCUMENT CONTROL

### Endorsement

Doc #	Current Version	Approval Date	Approved By	Review Period	Author	Class
CHG 042	8	9/2016	Justin O'Flaherty	Annual	Justin O'Flaherty	5

## Version Control

Doc #	Title	Version	Revision Date	Author/Modifier
CHG 042	Privacy Policy	7	9/2016	Vanita Vidal

# PRIVACY POLICY

## GENERAL

We respect your privacy and are committed to protecting it. We are bound by the Privacy Act and the Australian Privacy Principles.

Our Privacy Policy applies to CLHGroup, including (but not limited to):

- CLH Business Services
- CLH Legal Group Pty Ltd trading as CLH Lawyers
- Collection House Limited
- Collective Learning and Development Pty Ltd
- Lion Finance Pty Ltd
- Midstate CreditCollect Pty Ltd
- Safe Horizons Pty Ltd
- ThinkMe

(all collectively referred to as CLHGroup and, as the case may be, “we”, “our” or “us”).

The purpose of our Privacy Policy is to inform you about how we manage your personal information. For information about how we manage your personal credit information, please refer to our Credit Reporting Policy on our websites - [www.clhgroup.com.au](http://www.clhgroup.com.au).

## PERSONAL INFORMATION

The CLH Group collects personal information for the purpose of performing our various functions and activities, assisting you with financial solutions and, in the ongoing management of our relationship with you including, providing our products and services.

“Personal information” means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information is recorded in material form or not.

If we cannot collect your personal information, we may not be able to deal with you or perform our functions and activities.

## OUR FUNCTIONS AND ACTIVITIES

Our functions and activities include:-

- assisting you with financial solutions such as credit products and services
- providing training and consulting services
- recruiting staff, and
- providing accounts receivable management services for our clients and/or recovering defaulted, cancelled and/or terminated credit facilities
- acting as an agent for our clients such as banks, insurance companies and utility providers to recover defaulted, cancelled and/or terminated credit facilities

- purchasing and recovering defaulted, cancelled and/or terminated credit facilities from creditors such as banks and utility providers, and
- other related functions and activities.

Our functions and activities may require, where necessary, the disclosure of your personal information to our contractors in order to fulfil our functions and activities.

## **KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD**

The kinds of personal information we typically collect and hold include your:

- name
- contact details such as address, phone numbers and email
- date of birth
- information about your financial circumstances such as your assets, liabilities, income and employment information, and
- information about your defaulted, cancelled and/or terminated credit facilities or services
- information from credit reporting bodies.

Other types of personal information that we collect and hold may relate to credit information. For more information about personal credit information, how we manage your personal credit information and how to access your personal credit information, please refer to our Credit Reporting Policy on our websites [www.collectionhouse.com.au](http://www.collectionhouse.com.au)

## **SENSITIVE INFORMATION**

In certain circumstances, we may collect sensitive information about you such as health information if that is relevant to your financial circumstances. We only collect sensitive information with your consent or where we are otherwise permitted to do so.

## **TRAINING SERVICES**

If we are providing training services to you, the kinds of personal information we collect include:

- your name
- contact details, and
- information about your participation and progress in our training programs such as your assessment results.

## **EMPLOYMENT**

If you are being considered for employment with us, the kinds of information we collect include:

- your name
- contact details
- employment history
- qualifications
- references, and
- background checks where necessary.

## **HOW WE COLLECT YOUR PERSONAL INFORMATION**

## **DIRECTLY**

We collect your personal information directly from you, or in circumstances where you have appointed an authorised representative, from the authorised representative. Collection may occur during the course of our dealings by telephone, email, fax and/or letter.

## **INDIRECTLY**

We may collect personal contact information about you from your family, friends or other third party associates.

We may collect your personal information indirectly from you through the access to and use of services and facilities available on our websites including:

- our online customer portal
- cookies, and
- social media channels (including LinkedIn, Facebook and Twitter).

We collect your personal information from your creditors or service providers when we:

- are assisting you with a financial solution such as assisting with a loan application.
- are engaged by them to manage or recover a defaulted, cancelled and/or terminated credit facility or service, or
- purchase a defaulted, cancelled and/or terminated credit facility or service from them
- act on their behalf as their agent

We may collect information from credit reporting bodies or other information providers.

We also collect your personal information by recording phone calls.

We may also collect statistical and other information from our websites and other websites by using cookies. You may turn cookies off in your browser at any time.

## **THIRD PARTIES**

If you are a customer and we are have difficulty locating or contacting you, we may collect your personal information by making discreet enquiries with third parties. If necessary, we may collect information from your employer to verify your employment status and income details.

## **TRAINING**

If we are providing training services to you, we collect your personal information from:

- you,
- your employer and
- relevant government bodies.

## **EMPLOYMENT CANDIDATES**

If you are being considered for employment with us, we collect information from:

- you during our recruitment process
- recruitment agencies
- your referees, and

- by undertaking necessary background checks.

## HOW WE HOLD YOUR PERSONAL INFORMATION

We understand that the security of your personal information is important to you so we take steps to protect your personal information from misuse, interference, loss and from unauthorised access, modification or disclosure. These steps include:

- training all of our staff on the appropriate handling of personal information
- restricting access to our computer systems, physical records and premises to authorised persons, and
- protecting our technology environment with appropriate security measures such as firewalls and encryption.

We will normally hold your information in a database.

## MULTIPLE RECORDS

Should we hold multiple records of your personal information, subject to legal and contractual obligations, we will link the multiple instances of your personal information together so that we can better manage our business relationship with you when we are carrying out our functions and activities.

## ARCHIVING

Personal information that is no longer needed but is required to be held is stored in a secure offsite facility.

## DESTRUCTION/DE-IDENTIFICATION

We take steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose. If we inadvertently come into possession of personal information that is not relevant to our functions or activities, we will destroy that information.

All information is subject to our Records Retention and Destruction Policy available on our websites [www.collectionhouse.com.au](http://www.collectionhouse.com.au).

## PURPOSES THAT WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

We collect, hold, use and disclose your personal information so that we can undertake our functions and activities efficiently and effectively, including:

- identifying you
- contacting you
- responding to your enquiries
- providing you with financial solutions such as credit products and services;
- processing applications for employment
- meeting legal or other regulatory obligations imposed on us
- administering our relationship with you and/or with your original credit provider
- auditing and managing the usage of our websites
- to update our records and keep your contact details up to date
- by engaging contractors to carry out a function or activity for us, and

- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or other governmental authority.
- entering into suitable recovery arrangements with you in relation to the defaulted, cancelled and/or terminated credit facilities
- providing defaulted, cancelled and/or terminated credit facility recovery services and the associated administration services of performing this function, including where applicable administering the provision of legal services
- to process and respond to any communication or complaint made by you to us, or to your original credit provider, or with our external dispute resolution providers;

Unless you consent or we are otherwise permitted to do so by law, personal information will only be used for the purpose for which it was collected (the “**primary purpose**”) or for a purpose related, or in the case of sensitive information, directly related to the primary purpose (the “**secondary purpose**”).

The main consequences of us not collecting personal information are an inability or delay in being able to identify you, contact you or provide financial solutions or other products and services to you.

We do not use your tax file number, pension number, driver’s license number, Australian Business Number, Medicare number or any other government derived identifier as an account number or as our own identifier for you. However, we may request provision of one of these identifiers to assist in evidencing your identity when you deal with us.

We only disclose personal information in accordance with the Privacy Act. This may involve disclosing such information to:

- organisations forming part of the CLH Group of companies
- our authorised agents
- our legal advisers
- to the original credit provider
- your authorised representatives
- courts and tribunals
- our service providers where we outsource functions (such as, but not limited to, process serving, repossession, bulk mail handling or document storage and destruction)
- any entity that may acquire an interest in your credit facility, and
- other persons with your consent.

We may also disclose certain credit related personal information to credit reporting bodies. For example, if you fail to meet repayment obligations, we may be entitled to disclose that information to a credit reporting body. When such information is disclosed to a credit reporting body, the credit reporting body may include such information in reports that are subsequently provided to credit providers to assist them in assessing your credit worthiness.

We disclose information to the following credit reporting bodies:

<b>Veda Advantage:</b>	<a href="http://www.veda.com.au">www.veda.com.au</a>	1300 921 621
<b>Dun and Bradstreet:</b>	<a href="http://www.dnb.com.au">www.dnb.com.au</a>	13 23 33
<b>Experian:</b>	<a href="http://www.experian.com.au">www.experian.com.au</a>	1300 783 684

For more information about personal credit information, how we manage your personal credit information and how to access your personal credit information, please refer to our Credit Reporting Policy on our websites [www.collectionhouse.com.au](http://www.collectionhouse.com.au)

## **DIRECT MARKETING**

We may undertake direct marketing to you of products and services that we consider may be of interest or benefit to you. We may contact you for direct marketing purposes in a variety of ways including by mail, email, SMS, telephone, online advertising or facsimile.

If you do not want your personal information used for direct marketing purposes, please contact our Resolution Team to opt-out at any time.

All contractors are under Agreement and are required to comply with the Privacy Act and the Australian Privacy Principles (APPs) when fulfilling their functions and activities.

## **OUR WEBSITES**

When you visit our websites, we may send a 'cookie' to your computer. A cookie is a small message given to your web browser by our web server. Your browser stores the message in a text file and the message is then sent back to our web server each time your browser requests a page from our web server.

We make limited use of cookies on our websites. We may use cookies to measure usage sessions accurately and to gain a clear picture of which areas of our websites attract traffic. We may also use cookies to improve the functionality of our websites.

When cookies are used, they are used to store information relating to your visit such as a unique identifier or a value to indicate whether you have seen a web page. We may use session and permanent cookies. They are used to distinguish your internet browser from the thousands of other browsers.

Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice whether to accept it or not.

As our websites are linked to the internet and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information that you transmit to us online is transmitted at your own risk.

## **ACCESSING YOUR PERSONAL INFORMATION**

You can request access to your personal information by submitting a completed Personal Information Request Form and a copy of your driver's license or another form of government identification document to our Resolutions Team. The Personal Information Request Form is available on our websites or by contacting our Resolutions Team. We will provide you with a copy of your personal information within a reasonable period after the request is made, usually within 30 days.

In some cases, we may charge a reasonable fee to provide access to your personal information, but we will never charge you a fee to make a request. If a fee will apply, we will advise you before we provide access.

In certain circumstances we are permitted to withhold or limit access to your personal information. If this happens, we will inform you of the reasons for this where possible.

In certain circumstances you may have the right to access your personal information under the Freedom of Information Act 1982 by making a Freedom of Information request.

## SEEKING CORRECTION OF YOUR PERSONAL INFORMATION

We will take reasonable steps to ensure that your personal information is accurate, up-to-date, complete, relevant and not misleading. If you believe the personal information we hold about you is not correct, please contact our Resolutions Team. We will provide you with a copy of your personal information within a reasonable period after the request is made, usually within 30 days.

If we are unable to correct your personal information, we will advise you of this in writing and provide the reason.

## MAKING A COMPLAINT

If you have any concerns about how we have managed your personal information, you can:

- speak with the Customer Service Officer managing your matter
- request to speak with a manager or our Resolutions Team at any time
- contact our Resolutions Team directly
- contact the relevant External Dispute Resolution scheme (if applicable), or
- contact the Office of the Australian Information Commissioner.

## RESOLUTIONS TEAM – CONTACT DETAILS

**Email:** resolutions@collectionhouse.com.au  
**Phone:** 1800 173 355  
**Fax:** (07) 3831 6655  
**Mail:** Resolutions Team  
CLHGroup  
PO Box 2247  
Fortitude Valley BC QLD 4006

## EXTERNAL DISPUTE RESOLUTION SCHEMES

For **Collection House Limited** and **Midstate CreditCollect Pty Ltd**, the applicable External Dispute Resolution scheme is Financial Ombudsman Service Limited (FOS):

**Websites:** [www.fos.org.au](http://www.fos.org.au)  
**Phone:** 1300 78 08 08

For **Lion Finance Pty Ltd** and **ThinkMe** the applicable External Dispute Resolution scheme is Credit and Investment Ombudsman:

**Websites:** [www.cio.org.au](http://www.cio.org.au)

**Phone:** 1800 138 422

## **OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER**

**Websites:** [www.oaic.gov.au](http://www.oaic.gov.au)

**Phone:** 1300 363 992

## **OVERSEAS DISCLOSURES OF YOUR PERSONAL INFORMATION**

We may need to disclose certain information to overseas recipients from time to time to perform a range of technology, operational and customer service functions and activities for us.

We take the necessary steps to protect your personal information when it is disclosed overseas. We may disclose your personal information to our overseas subsidiaries in New Zealand and the Philippines. We may disclose your personal information to our contractors or service providers in overseas countries including the United States, New Zealand and the Philippines.

If you relocate overseas or we have reason to believe that you are located overseas, we may disclose your personal information to our overseas agent in that country to assist us in performing our functions and activities.

## **CHANGES TO OUR PRIVACY POLICY**

From time to time we may review and update our Privacy Policy. We will publish the current version on our websites.