

Privacy Policy

For Vast Capital Pty Ltd
trading as
Vast Capital Mortgage Management
ABN 56 630 388 635

Vast Capital Pty Ltd trading as Vast Capital Mortgage Management is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988 (Cth)* (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aoic.gov.au.

“PARTIES” means Vast Capital Pty Ltd trading as Vast Capital Mortgage Management (ABN 56 630 388 635; Australian Credit Licence 514947), Australian Select Mortgage Pty. Ltd. (ABN 62 163 151 853; Australian Credit Licence 438445), The Trustee for Australian Select Mortgage Trust (ABN 12 234 791 819), Broker Co Pty Ltd (ABN 26 637 831 175; Australian Credit Representative Number 520269), Seven Two Three Pty Ltd (ACN 662 816 506; Australian Credit Representative Number 545723) and its related bodies corporate, any party who processes the loan application, any insurer, financier, manager, servicer, and any agent of the lender who has an interest in the credit. In this privacy consent, “we”, “us” and “our” includes each of the Parties.

“APPLICANT” means a company, trust, association or partnership of which you are a beneficial owner and/or control owner or settlor of trust as defined by the *Anti-Money Laundering and Counter Terrorism Financing Act 2006*.

PERSONAL INFORMATION

Personal information includes any information or an opinion about an identified individual, or an individual who is reasonably identifiable.

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 may need to identify you including publicly available information from public registers and social media.

If you are applying for finance, we may also collect the number and ages of your dependents and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses.

If you use our website or mobile applications, we may collect information about your location or activity including IP address, telephone number and whether you have accessed third-party sites, the date and time of visits, the pages that are viewed, information about the device used and other user location information. We may collect some of this information using cookies.

CREDIT INFORMATION

Credit information includes information such as:

- your identity information, including having your identity information verified with the Issuer or Official Record Holder via the Credit Reporting Bodies (CRBs) systems for the purpose of verifying your identity;
- consumer credit liability information;
- a statement that an information request has been made in relation to you by us, a Credit Provider or a Lenders Mortgage Insurer or trade insurer;
- the type, terms and maximum amount of credit provided to you;
- repayment history information;
- financial hardship information, including information that any repayments are affected by a financial hardship arrangement;
- default information, including overdue payments;
- new arrangement information;
- personal insolvency information;
- court proceedings information;
- details of any serious credit infringements (as determined by us or a Credit Provider); and
- publicly available information that relates to your activities in Australia or the external Territories and your creditworthiness and that is not court proceedings information about you or information about you that is entered or recorded on the National Personal Insolvency Index.

Credit eligibility information is credit reporting information supplied to us by a CRB and any information that we derive from it. Collectively, we refer to this as 'credit-related information'.

SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information. Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

Vast Capital Mortgage Management primarily collects, uses, holds and discloses personal information (including credit information) that is reasonably necessary for us to perform our functions or activities. Our functions consist principally of originating loans as a Mortgage Manager and our activities include arranging or providing credit to you, processing your application for credit, assessing whether to accept a guarantee of credit from you, managing that credit, direct marketing of products and services by us, complying with laws, managing our relationship with you, allowing us to perform administrative tasks, accrediting you as an aggregator, broker or introducer of loans and other products (if applicable) and accepting investments.

We are also required to collect your personal information to comply with our obligations under Australian law, including the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*.

From time to time we may offer other products and services and conduct direct marketing to you. You may unsubscribe from our mailing/marketing lists at any time by clicking on the "unsubscribe" link in the marketing emails sent to you or by contacting us in writing.

In addition, we will collect and receive personal information about you if you seek employment with us.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

This Personal Information is obtained in many ways including (but is not limited to) interviews, correspondence, by telephone and facsimile, by email, via our website www.vcmm.com.au, from your current or previous employer's website, from media and publications, from other publicly available sources, from cookies and from third parties. We do not guarantee website links or policy of authorised third parties.

THIRD PARTIES

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

DISCLOSURE OF PERSONAL INFORMATION

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

STORAGE AND SECURITY OF PERSONAL INFORMATION

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

We and our Mortgage Insurers may store your personal information and credit-related information in cloud or other types of networked or electronic storage and will take reasonable steps to ensure its security. However, it is not always practicable to find out where your information may be accessed or held, as electronic or networked storage can be accessed from various countries via an internet connection.

ACCESS TO YOUR PERSONAL INFORMATION

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Vast Capital Mortgage Management will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

CONSUMER AND COMMERCIAL CREDIT-RELATED INFORMATION

We may exchange your commercial and consumer credit-related information with entities listed below to assess an application for consumer or commercial credit and manage that credit (including to collect any payment that is overdue). In particular, we can obtain credit-related information about you from a CRB providing both consumer and commercial credit-related information.

EXCHANGE INFORMATION WITH CREDIT PROVIDERS

We may exchange your personal information and credit-related information with other credit providers for the purposes of assessing your creditworthiness, credit standing, and credit history or credit capacity.

DISCLOSE INFORMATION TO GUARANTORS

We, the relevant Credit Provider and the Lenders Mortgage Insurers may disclose your personal information and credit-related information to any person (or their authorised representative) who proposes to guarantee or has guaranteed repayment of any credit provided to you or who indemnifies you in any way

EXCHANGE INFORMATION

We may exchange personal information and credit-related information with the following types of entities, some of which may be located overseas. Please see our privacy policy for more information.

- The CRBs identified below
- The lenders' mortgage insurers identified below
- Introducers including finance brokers, dealers, suppliers, mortgage managers, and persons who assist us to, or jointly with us, provide our products and services to you
- Any person who represents you including your financial consultants, accountants, lawyers, advisers, referees (such as your employer, to verify information you have provided) and representatives including executors, administrators, guardians, trustees' attorneys and persons holding power of attorney
- Our auditors, accountants, lawyers, attorneys, and other external advisors
- Any industry or regulatory body, government authority, tribunal, court or otherwise in connection with any complaint regarding the approval or management of your lease or loan – for example if a complaint is lodged about us
- Any investors, agents or advisers, trustees, ratings agency or businesses assisting us with funding for credit made available to you or any entity that has an interest in your finance or our business
- Any person where we are authorised or required to do so by law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), or by government and law enforcement agencies or regulators, or where you have provided us consent
- Entities to whom we outsource some of our functions and external service providers (for example IT services, entities to help verify your identity including organisations providing online verification of identity, entities to help verify your income and expenditure, entities to help identify, investigate and prevent illegal activities such as fraud etc) or that provide information and infrastructure systems
- Other financial institutions such as banks, for example to process a claim for mistaken payment
- Real estate agents
- Medical professionals, medical facilities or health authorities who verify health information you may provide
- Insurers, valuers, debt collection agencies auditors, insurers, re-insurers and health care providers
- Any person considering acquiring an interest in our business or assets
- Any person who is a supplier of an asset to you
- Security registration bodies
- Other persons who have an interest in the property offered to us as security
- Other borrowers or guarantors (if more than one) or borrowers or prospective borrowers of any

- credit you guarantee or propose to guarantee
- Any of our associates, related entities or contractors such as claims related providers including assessors and investigators that help us with claims
- Associated businesses that may want to market products to you

CUSTOMER IDENTIFICATION

We, our lenders and the Lenders Mortgage Insurers may disclose your name, date of birth and address to an organisation, including a CRB, providing verification of your identity, including on-line electronic verification of your identity, to request an assessment of whether that information matches information held in their files (an 'Information Match Request'). Your personal details will be matched to information held by the issuer of the identification document (the "Official Record Holder") via the use of third-party systems. Alternative means of verifying your identity may be available.

We may also use information about your Australian Passport, state or territory driver licence, Medicare card, citizenship certificate, birth certificate, and any other identification documents to match those details with the relevant registries using third-party systems and record the results of that matching.

MORTGAGE INSURERS

We may disclose personal information and credit-related information to the Lenders Mortgage Insurers and the title insurers (collectively, Mortgage Insurers) listed below. Where permitted by the *Privacy Act 1988*, the Mortgage Insurers may disclose your personal information and credit-related information to us and to third parties including the CRBs listed below; rating agencies; the Mortgage Insurer's related entities, service providers, agents, contractors and external advisors; reinsurers, other mortgage insurers and mercantile agents; payment system operators, other financial institutions and credit providers; other parties for the purposes of securitisation and fraud prevention; your guarantor or proposed guarantor; your referees and advisers; government and other regulatory bodies; and other entities. Where permitted by the *Privacy Act 1988*, the Mortgage Insurers may seek and obtain commercial and consumer credit-related information from a CRB including (but not limited to) information concerning your creditworthiness or credit history; and information about overdue payments.

Where permitted by the *Privacy Act 1988*, the Mortgage Insurers will hold, use and disclose your personal information and credit-related information for the purposes of securing and administering lenders' mortgage insurance for your mortgage, including assessing whether to provide insurance, including assessing the risk of you defaulting or the risk of a guarantor being unable to meet their liability; managing and varying the insurance; dealing with claims, enforcing a mortgage and recovering the proceeds of sale; assessing hardship; conducting risk assessment and management involving securitisation; for fraud prevention; for credit scoring, portfolio analysis and reporting; to comply with regulatory requirements; to verify personal information and credit-related information provided to it; or for any purpose required or permitted under the insurance contract, the *Insurance Contracts Act 1984 (Cth)* and the *Privacy Act 1988*. If the personal information and credit-related information is not disclosed to the Mortgage Insurer(s), it will not be possible for the Mortgage Insurer to process the credit provider's request for insurance, and we may not be able to arrange or provide credit for you or provide other services.

The privacy policies and credit reporting policies of the Mortgage Insurers contain information about how they collect, use, hold and disclose your personal information and credit-related information, how you may access the personal information and credit-related information those entities hold about you, how to seek correction of that information, how you may complain about a breach of your privacy, and how that complaint will be dealt with.

INFORMATION GIVEN ABOUT OTHER PEOPLE

If you have provided us with information about another individual (such as your employer, spouse, referee or solicitor), you must let them know that:

- We have collected their personal information to assess your application and manage any credit provided to you

- We may exchange this information with any parties set out in this document and our privacy policy
- We handle their personal information in the way set out in our privacy policy

Where you provide us with the personal information of another person, you confirm that you are authorised to provide these identification details to us on that person's behalf.

OVERSEAS DISCLOSURE

We, the relevant Credit Provider and the Lenders Mortgage Insurers may disclose your personal information, and credit-related information to overseas entities including related entities and service providers located overseas in the United Kingdom, New Zealand, Asia-Pacific, European Union, the United States of America, Canada and the Philippines. Overseas entities may be required to disclose information to relevant foreign authorities under foreign law. More information on overseas disclosure may be found in the entities' privacy policies.

Whilst we attempt to select and secure reputable offshore service providers, we are not liable for any breach or misuse of information sent offshore. An overseas entity may not be subject to privacy laws or principles similar to those which apply in Australia, and any information disclosed to an overseas entity may not have the same protection as under the Australian Privacy law. You may not be able to seek redress for any breach of your privacy which occurs outside of Australia.

CREDIT REPORTING BODIES

We, the relevant Credit Provider and the Lenders Mortgage Insurers may exchange your personal information and credit-related information with the CRBs listed below, including allowing a CRB to create or maintain a credit information file about you. The information may be included in reports that the CRBs give other organisations (such as other lenders) to help them assess your credit worthiness. Some of the information may adversely affect your credit worthiness (for example if you have defaulted on your loan) and accordingly, may affect your ability to obtain credit from other lenders.

- Dun & Bradstreet -
 - dnb.com.au
 - <http://dnb.com.au/privacy-policy-html>
- Equifax Pty Limited -
 - equifax.com.au
 - <https://www.equifax.com.au/privacy>
- Experian Australia Credit Services Pty Limited -
 - experian.com.au
 - <http://www.experian.com.au/privacy-policy>

POLICY UPDATES

This Policy may change from time to time and is available upon request.

PRIVACY POLICY COMPLAINTS AND ENQUIRIES

If you have any queries or complaints about our Privacy Policy, please contact us by:

Telephone: 1300 776 276
 Email: info@vcmm.com.au (queries)
 complaint@vcmm.com.au (complaints)
 Post: Vast Capital Mortgage Management, Level 13, 122 Arthur Street, North Sydney NSW 2060

You can refer your complaint to our external dispute resolution scheme detailed below if you are unhappy with the handling of your complaint by us.

Australian Financial Complaints Authority (AFCA)

Telephone: 1800 931 678 (9:00am – 5:00pm AEST weekdays)

Fax: (03) 9613 6399

Email: info@afca.org.au

Post: Australian Financial Complaints Authority Limited
GPO Box 3
Melbourne, VIC 3001

Online Compliant: <https://www.afca.org.au/make-a-complaint/complain/>

SCHEDULE

In this privacy policy, “we”, “us” and “our” means each of the following companies, their successors and assigns and companies that are part of the same group of companies.

- Adelaide Bank a division of Bendigo and Adelaide Bank Limited (ABN 11 068 049 178)
 - Australian Credit Licence 237879
 - GPO Box 1048, Adelaide SA 5001
 - www.adelaidebank.com.au
- Advantedge Financial Services Pty Ltd (ABN 36 130 012 930)
 - Level 10, 10 Collins Street, Melbourne VIC 3000
 - P: 03 8616 1600
 - www.advantedge.com.au
- AFSH Nominees Pty Limited (and associated entities) (ABN 51 143 937 936)
 - Level 10, 101 Collins Street, Melbourne VIC 3000
 - P: 03 8616 1600
 - www.advantedge.com.au
- AMAL Asset Management Pty Ltd (ABN 31 065 914 918)
 - Level 9, 9 Castlereagh Street Sydney, NSW 2000
 - <https://www.amal.com.au/>
 - Australian Select Mortgage Pty. Ltd. (ABN ABN 62 163 151 853)
 - Australian Credit Licence 438445
- BC Invest Loans Pty Ltd (ABN 646 785 211)
 - Level 1, 274 Coventry Street South Melbourne VIC 3205
 - <https://www.bcinvest.co/privacy-policy>
- BNY Trust Company of Australia Limited (ABN 49 050 294 052)
 - Level 2, 1 Bligh Street, Sydney NSW 2000
 - Telephone: 02 9260 6000
- Brighten Home Loans Pty Ltd (ACN 620 839 983)
 - Suite 3101, Level 31, Australia Square, 264 George Street, Sydney NSW 2000
 - P: 02 8880 6633
 - <https://brighten.com.au/privacy-policy/>
- Broker Co Pty Ltd (ABN 26 637 831 175)
 - Australian Credit Representative Number 520269
- BTA Institutional Services Australia Limited (ABN 48 002 916 396)
 - Level 2, 1 Bligh Street, Sydney NSW 2000
 - Telephone: 02 9260 6000
- Challenger Mortgage Management Pty Ltd (ABN 72 087 271 109)
 - Level 15, 255 Pitt Street, Sydney NSW 2000
 - P: 02 9994 7000
 - www.advantedge.com.au
- Columbus Capital Pty Ltd (ABN 511 1953 1252)
 - Australian Credit Licence 337303
 - <http://columbuscapital.com.au>
- FAI First Mortgage Pty Ltd (ABN 67 003 963 817)
 - Level 9, 45 Clarence Street, Sydney NSW 2000
 - www.homeloans.com.au
- Homeloans Ltd (ABN 67 003 963 817)
 - Level 9, 45 Clarence Street, Sydney NSW 2000
 - www.homeloans.com.au
- ING Bank (Australia) Limited (ABN 24 000 893 292)
 - 60 Margaret St, Sydney NSW 2000
 - www.ing.com.au
- La Trobe Financial Asset Management Limited (ACN 007 332 363; Australian Credit Licence 222213)
- La Trobe Financial Services Pty Limited (ACN 006 479 527; Australian Credit Licence 392385)
- La Trobe Financial Services Pty Limited Australian Credit Licence 392385 (ACN 006 479 527)
- Labassa Capital Pty Ltd (ABN 70 628 950 149)
 - <https://www.labassa.com/privacy>
- Macquarie Securitisation Limited (ACN 003 297 336)

- Australian Credit Licence 237863
 - 1 Shelley Street, Sydney NSW 2000
 - www.macquarie.com
- MKM Capital Pty Ltd (ACN 111 776 464; Australian Credit Licence Number 391121)
 - <http://www.mkmcapital.com.au/about/privacy-policy>
- Mortgage House Pty Ltd (ABN 98 081 508 054)
 - Australian credit licence 393283
- Pepper Asset Finance Pty Ltd (ACN 165 183 317; Australian Credit Licence 458899)
- Pepper Finance Corporation Limited (ABN 51 094 317 647)
- Pepper Group Pty Limited (ABN 55 094 317 665; Australian Credit Licence 286655):
 - Telephone: 1800 737 737
 - PO Box 6186 North Sydney 2060
 - www.pepper.com.au/privacy-policy
- Pepper Homeloans Pty Limited (ABN 86 092 110 079)
- Permanent Custodians Limited (ABN 55 001 426 384; Australian Credit Licence 253129; Australian Financial Services Licence 253129)
 - Telephone: 02 9551 5000
 - Level 2, 35 Clarence Street, Sydney NSW 2000
 - <http://www.bnymellon.com/australia/en/privacy.html>
- Permanent Mortgages Pty Limited (ACN 097 176 362),
- Permanent Mortgages (No 2) Pty Limited (ACN 109 141 531);
- Perpetual Ltd (ACN 000 431 827)
 - Level 6, 123 Pitt Street, Sydney NSW 2000
 - <https://www.perpetual.com.au/privacy-policy>
- Perpetual Trustee Company Limited (ABN 42 000 001 007)
 - Level 12, 123 Pitt Street, Sydney NSW 2000
 - www.perpetual.com.au
- Perpetual Trustee Victoria Limited (ABN 47 004 027 258)
 - Level 28, 360 Collins Street, Melbourne VIC 3000
 - www.perpetual.com.au
- Proviso Pty Ltd trading as BankStatements.com.au (ABN 89 166 277 845)
 - Telephone: 08 7122 9452
 - <https://www.bankstatements.com.au/about/privacy>
 - <https://www.bankstatements.com.au/about/terms>
- RAFG Pty Ltd (CAN 628 356 669; Australian Credit Licence 512386)
- Rate Money Pty Ltd (ABN 92 632 468 056)
- Resimac Limited (ABN 67 002 997 935)
 - Level 9, 45 Clarence Street, Sydney NSW 2000
 - www.resimac.com.au
- Sintex Consolidated Pty Ltd (ABN 75 065 917 535; Australian Credit Licence 385129; Australian Financial Services Licence 385129)
 - Telephone: 02 9278 9700
 - Level 3, 458 Wattle Street, Ultimo NSW 2007
 - <http://www.sintex.com.au/files/online-privacy>
- Source Funding Pty Ltd (ABN 95 622 815 294)
 - Australian Credit Licence 510226
 - Level 6/201 Kent Street, Sydney NSW 2000
 - Telephone: 02 9157 1100
 - <https://sourcefunding.com.au/policy/privacy-policy.pdf>
- Think Tank Group Pty Ltd (ABN 75 117 819 084)
 - https://www.thinktank.net.au/app/uploads/2015/12/Thinktank_Loan_Privacy_Policy_140325.pdf
- Well Nigh Capital Funding No 1 Pty Ltd (ABN 17 603 911 995)
 - <http://www.peppergroup.com.au/privacy-policy>
- Well Nigh Pty Ltd (ACN 131 937 632)
 - Australian Credit Licence 392216
 - http://www.wellnigh.com.au/uploads/3/8/8/5/38853761/well_nigh_privacy_policy.docx
- Westpac Banking Corporation (ABN 33 007 457 141)
 - Australian Credit License 233714
 - 275 Kent Street, Sydney NSW 2000

- Telephone: 02 9155 7700
- www.westpac.com.au/privacystatement/

The “Insurer, Lenders Mortgage Insurer or LMI” means each of the following organisations and their respective successors and assigns and companies that are part of the same group of companies:

- First American Title Insurance Company of Australia Pty Ltd (ABN 64 075 279 908)
 - PO Box Q1465, QVB Post Office NSW 1230
 - www.firsttitle.com.au
- Helia Insurance Pty Ltd (ABN 60 106 974 305)
 - Level 26, 101 Miller Street, North Sydney NSW 2060
 - Telephone: 1300 655 422
 - <http://helia.com.au/>
 - <http://helia.com.au/privacy-policy>
- QBE Lenders’ Mortgage Insurance Limited (ABN 70 000 511 071)
 - Telephone: 1300 367 764
 - www.qbelmi.com