

# PWA Financial Group Pty Ltd

## CREDIT INFORMATION POLICY

### 1. INTRODUCTION

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- 1.1 We are not subject to the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**) but we do handle personal and credit information. This policy has been developed to ensure that our credit information is handled appropriately.
- 1.2 We are committed to complying with the Privacy Act in relation to all credit information we collect. Our commitment is demonstrated in this policy.
- 1.3 The privacy of your personal information is also important to us, and we have safeguards in place to manage that information.

#### Who does the policy apply to?

- 1.4 This policy applies to any person for whom we currently hold, or might in the future collect, credit information.

#### What information does the policy apply to?

- 1.5 This policy applies to 'credit information' and 'credit eligibility information'. In broad terms, these types of information relate to financial information that may impact your credit eligibility.

### 2. WHAT KINDS OF CREDIT INFORMATION MIGHT WE COLLECT?

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- 2.1 In our capacity as a credit provider, we will only collect your identification information and payments details.
- 2.2 However, in the course of providing accounting or financial services for you, we might collect and hold the following kinds of credit information, if it is necessary to provide you with the accounting, financial or business improvement service:
  - (a) information about any credit that has been provided to you;
  - (b) your repayment history;
  - (c) information about your overdue payments;
  - (d) if terms and conditions of your credit arrangements are varied;
  - (e) if any court proceedings are initiated against you in relation to your credit activities;
  - (f) information about any bankruptcy or debt agreements involving you;
  - (g) any publicly available information about your credit worthiness; and
  - (h) any information about you where you might have fraudulently or otherwise committed a serious credit infringement.
- 2.3 We may also collect personal information which may affect your credit worthiness from other credit providers (e.g. banks) that collect that information from credit reporting bodies. Again, this information is only collected if it necessary to provide you with the accounting, financial or business improvement service. The kinds of information we might collect are the same as those set out in section 2.2 of this policy.

### **3. HOW AND WHEN DO WE COLLECT CREDIT INFORMATION?**

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- 3.1 In most cases, we will only collect credit information about you if you disclose it to us and it is relevant in providing you with the accounting, financial or business improvement service.
- 3.2 Other sources we might collect the credit information from include:
- (a) government bodies (for example, the Australian Taxation Office or the Australian Securities and Investment Commission)
  - (b) banks and other credit providers;
  - (c) other individuals and entities via referrals;
  - (d) your suppliers and creditors;
  - (e) other advisors or consultants (such as your solicitors).
- 3.3 We do not collect and hold credit information from credit reporting bodies unless it is incidentally collected in providing the accounting, financial or business improvement service for you.

### **4. HOW DO WE STORE AND HOLD THE CREDIT INFORMATION?**

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- 4.1 Our usual approach to holding credit information includes:
- (a) physically:
    - (i) at our premises (securely); and
    - (ii) off-site, by third party physical storage providers (securely);
  - (b) electronically:
    - (i) on secure online servers
- 4.2 We also use third party software providers that may store your information in a cloud (for example, Xero).
- 4.3 We secure the credit information we hold in numerous ways, including:
- (a) limiting access to personal and credit information to authorised persons only;
  - (b) using secure servers to store credit information;
  - (c) using unique usernames, passwords and other protections on systems that can access credit information; and
  - (d) holding certain sensitive documents securely.
- 4.4 If we have no reason to hold your credit information, we will take reasonable steps to destroy or de-identify the information in a safe and secure manner (subject to our professional obligations).

### **5. WHY DO WE COLLECT THE CREDIT INFORMATION?**

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- 5.1 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with the accounting, financial or business improvement service.
- 5.2 We might also collect the credit information to process payments relating to our services.

## **6. OVERSEAS DISCLOSURE OF THE CREDIT INFORMATION**

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We will not disclose your credit information to entities without an Australian link unless you expressly request us to. However, if you use a third party software provider (eg Xero), then that provider may store any information in an overseas location (such as the USA for Xero).

## **7. HOW CAN YOU MAKE COMPLAINTS AND ACCESS AND CORRECT YOUR CREDIT INFORMATION?**

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7.1 It is important that the information we hold about you is up-to-date. You should contact us if your credit information changes.

### **Access to information and correcting credit information**

7.1 You may request access to the credit information held by us or ask us for your credit information to be corrected by using the contact details in this section.

7.2 We will grant you access to your credit information as soon as possible, subject to the request circumstances and our professional obligations.

7.3 In keeping with our commitment to protect the privacy of credit information, we may not disclose credit information to you without proof of identity.

7.4 We may deny access to credit information if:

- (a) the request is unreasonable;
- (b) providing access would have an unreasonable impact on the privacy of another person;
- (c) providing access would pose a serious and imminent threat to the life or health of any person;
- (d) providing access would compromise our professional obligations; or
- (e) there are other legal grounds to deny the request.

7.5 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.

7.6 If the credit information that we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

### **Complaints**

7.7 If you wish to complain about an alleged breach of this policy, then you must follow the following process:

- (a) The complaint must be firstly made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
- (b) In the unlikely event the issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

### **Who to contact**

7.8 You can complain or request to access or correct credit information we hold about you by using the contact details below. Any complaints must be made in writing:

**Privacy Officer:** Tina Clarke  
**Postal Address:** PO Box 237, Caloundra Qld 4551  
**Telephone number:** 07 5436 0300  
**Email address:** info@pwafinancial.com.au

## **8. CHANGES TO THE POLICY**

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- 8.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the policy will be published on our website.
- 8.2 This policy is effective from March 2014. If you have any comments on the policy, please contact the privacy officer with the contact details in section 0.8 of this policy.