

Privacy & Credit Information Policy Statement



Pioneer Credit Ltd (**Pioneer Credit, we, our or us**) and all related entities within [the Pioneer Credit Group](#) are committed to maintaining the confidentiality, security and integrity of your personal information held by us. In line with the *Privacy Act 1988* (Cth) (**Act**), the Australian Privacy Principles (**APPs**) and the Privacy (Credit Reporting) Code 2014 (Version 1.2)(**CR Code**), (and, if you are in New Zealand, the New Zealand Privacy Act 1993 (**NZ Act**), New Zealand Privacy Principles (**NZPPs**), and the New Zealand Credit Reporting Privacy Code (**NZ Code**), this Privacy & Credit Information Policy Statement (Privacy Policy) highlights the manner in which Pioneer Credit deals with your personal information and the choices available to you to access or correct your personal information.

What is personal information?

Personal information is information or an opinion whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

What kind of personal information is collected and held by Pioneer Credit?

We will only collect your personal information where it is reasonably necessary in connection with the services we are providing you. The types of personal information we collect include:

- your name, date of birth, residential and postal address, contact numbers, email address and employment details
- information about your account, including, where applicable, your contract with your original or previous credit provider and any personal information you provided in your credit application to your original credit provider, details of payments or default, default listings, correspondence and telephone contact between you and the original or previous credit provider, court proceedings and personal insolvency information
- information which you provide us about your financial situation such as your current income and expenses, queries made by you, complaints lodged, repayment history and transaction details
- your personal information and credit information held with various credit reporting bodies such as:
 - your repayment history and any defaults
 - credit requests (including amount and type) you have made to other credit providers
 - variations to credit arrangements following a default
 - court proceedings and personal insolvency

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- the opinion of credit providers about credit infringements committed by you
- information that we believe will assist us in locating contact details for you where we do not have current contact details
- for your sensitive information (such as criminal records, health information or membership of a professional or trade association/union) which we have collected with your consent, and
- your answers to our security questions, which will allow us to identify you over the phone.

How is your personal information collected?

Where reasonable and practicable, Pioneer Credit will collect your personal information from you. If we are unable to collect personal information from you, other sources which Pioneer Credit collects your personal information from include:

- the credit provider(s) who assigned your account(s) to us
- credit reporting bodies
- any third party who we believe may be able to assist us in making contact with you (where you have not been readily contactable directly)
- any third party authorised by you to be your representative or
- publicly available sources of information, including information which is publicly available online, or databases subscribed to by Pioneer Credit such as people search databases, property and tenancy databases.

Any unsolicited information we receive about you will be destroyed or de-identified unless it is information we could have collected in the manner described above.

Where practical and reasonable we will obtain your explicit consent before collecting sensitive information.

How does Pioneer Credit use your personal information?

Pioneer Credit uses your personal information for the following purposes:

- to assess your credit worthiness
- to allow us to appropriately manage your account, which includes identifying you and arranging for payment of the outstanding balance on your account
- to inform you of products (including consumer lending products) or services from us or our related entities or affiliates which may interest you, via direct marketing (you can tell us not to contact you for this purpose at any time,

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- to conduct checks with credit reporting bodies such as Equifax, Experian and Illion
- to facilitate Pioneer Credit's daily operational processes, including necessary record keeping
- to comply with legal or regulatory requirements or as authorised by legal or regulatory requirements, including under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007* (Cth), and, if you are in New Zealand, the *Anti-Money Laundering and Countering Financing of Terrorism Act 2009* and associated regulations
- for compliance, quality assurance and staff training purposes, for example when we communicate with you through phone calls, we may record or monitor the telephone conversation for this purpose
- to determine whether products or services offered by us, our related entities or affiliates, may be appropriate for your circumstances, and provide you access to these products and services of third parties such as/but not limited to lenders, licensed finance brokers, brokers, banks and/or credit unions,
- to allow us to update or inform a referrer about your success or non-success in applying for a product or service with Pioneer Credit, and
- to send you direct marketing about products or services which we believe may be appropriate for you, and you may be interested in (you can ask us not to contact you for this purpose at any time).

We will generally not use or disclose your personal information for any other purpose without your consent, but may do so where:

- it relates to an activity above and such use or disclosure would be reasonably expected
- we need to take appropriate action for suspected unlawful activities or serious misconduct
- it is used to locate a reported missing person
- required to establish, exercise or defend a legal or equitable claim
- required in connection with a confidential alternative dispute resolution process, and
- we reasonably believe it is required for enforcement related activities of an enforcement body.

Statistical Information Collected

We may collect statistical information regarding the use of any of the websites owned by the Pioneer Credit Group such as:

- a record of your IP address
- the date and time of your visit
- pages accessed and documents downloaded
- the length of time spent on specific areas of a website
- the referring webpage (if applicable)
- the type of browser and operating system used should you decide to contact us via any of our websites.

Remarketing

The Pioneer Credit Group and any of its wholly owned entities may use of remarketing services (or similar audience-targeted feature) in any of its websites for the purpose of:

- advertising and displaying content online
- allowing third party vendors, to show adverts on sites across the internet
- allowing third party vendors, to use cookies to display adverts based on someone's past visit to the website.

Turning off 'cookies' on your web browser may disable some remarketing functions.

In addition, we may also use interest based advertising to encourage traffic to any of the Pioneer Credit Group's websites.

Who do we disclose your personal information to?

In the course of our business, Pioneer Credit may disclose your personal information to outsourced service providers, which in some cases may be overseas, such as our operations in the Philippines.

We take our privacy obligations seriously and we aim to protect your personal information as described in this Policy no matter where you are located. The types of personal information we may send overseas are outlined in this Policy and the countries to which we may send personal information may vary from time to time depending on the location of the recipients of the information. We take reasonable steps to ensure that such recipients respect your privacy in a similar manner.

Pioneer Credit may also disclose your personal information to:

- a credit reporting body, in any manner that is permitted under the Act and the CR Code or NZ Code (see below for further details)
- the credit provider who assigned your account to us
- our accountants, auditors, lawyers
- your representatives (authorised party, lawyer, financial adviser, executor, administrator or trustee)
- any person to whom such disclosure is required by law or regulatory requirement or pursuant to court order
- Pioneer Credit's service providers, agents or contractors appointed to provide services to Pioneer Credit or its related, associated or affiliated companies. We ensure that these third parties observe similar security measures as adopted by Pioneer Credit
- parties where you have given your consent
- mail houses contracted to print and distribute statements and other documents and communications , or
- other companies within the group who offer products (including consumer lending products) or services which we believe you may be interested in, and which we would like to let you know about (you can let us know not to contact you for this purpose at any time).

Exchange of information with credit reporting bodies

Pioneer Credit uses the credit reporting services provided by Equifax, Experian and Illion. Equifax, Experian and Illion may include this information in reports to assist in assessments of credit worthiness. Equifax, Experian and Illion may use the information each of them holds about you for pre-screening for direct marketing. Please refer to Equifax, Experian and Illion's separate credit reporting policies for details on their management of credit reporting information. A copy of these policies can be obtained at each credit reporting bodies' website (listed below) or by visiting the websites and obtaining instructions for requesting via post (required forms and supporting documents are explained on each website)

Equifax – Public Access

In Australia:

Request credit file online at <http://www.equifax.com.au/personal/articles/understanding-your-credit-file>

Credit reporting bodies will generally be provided with information regarding your identification, your creditworthiness, the credit product held or being sought, your repayment history, any defaults and any serious credit infringements committed by you (such as fraudulently trying to either obtain credit or evade your obligations in respect of that credit). In the event we disclose default information about you to a credit reporting body, we will advise that credit reporting body when you have fully discharged the default amount.

Does Pioneer Credit store your personal information securely?

Yes. Pioneer Credit maintains the security of your personal information by implementing up-to-date security control systems to prevent:

- misuse, interference and loss of your personal information, and
- unauthorised access, modification or disclosure of your personal information.

If there is a breach which affects the security of your personal information what will Pioneer Credit do?

If Pioneer Credit becomes aware of a breach which affects the security of your personal information we are required to assess whether that breach may likely cause serious harm to you. If we believe there is risk of serious harm Pioneer Credit will notify the Australian Information Commissioner and take all reasonable attempts to contact you directly.

How long does Pioneer Credit keep your personal information?

The personal information collected will be retained by Pioneer Credit for the duration permitted or required under law. If specific personal information is no longer needed, Pioneer Credit will take steps to destroy the information or ensure the information is de-identified.

Can you refuse to provide your personal information?

Yes, but if you do not provide Pioneer Credit with some personal information, we may not be able to assist you.

Can you access your personal information held by Pioneer Credit?

Yes. You have the right to access your personal information held by Pioneer Credit. You may obtain a copy of any personal information we hold about you by contacting us below. To make this request please notify the Privacy Officer via email or post, using the contact options under the heading 'Our contact details' within this Policy Statement.

If you are in Australia, a fee may be imposed to process your request and to give you access to the personal information you require. In certain circumstances set out in the Act you will not be able to access your personal information, for example when:

- the information is relevant to legal proceedings between us and could not be obtained by you through the discovery process for those proceedings
- disclosure would be unlawful
- we reasonably suspect you have engaged in unlawful activity or serious misconduct relating to our activities and giving access would prejudice our ability to take appropriate action in respect of your conduct, or
- granting access would prejudice one or more enforcement related activities conducted by an enforcement body.

If you are in New Zealand, no fee will be imposed to process your request, including deciding whether or not the request is to be granted, but a fee may be imposed to give you access to the personal information you require. In certain circumstances set out in the NZ Act you will not be able to access your personal information, for example when:

- disclosure would be unlawful, or
- disclosure would prejudice the maintenance of the law, including the prevention, investigation, and detection of offences, and the right to a fair trial.

Whether you are in Australia or New Zealand, if we do not grant you access to all or some of your personal information we will provide you with a written statement explaining why we denied your request for access.

Your personal information has changed. Can you correct your personal information held by Pioneer Credit?

Yes. We aim to keep your personal information on our records accurate, complete and up-to-date.

You have the right to request your personal information be corrected / updated if the information held by us is incorrect, incomplete or not up to date. To make this request please notify the Privacy Officer via email or post, using the contact options under the heading 'Our contact details' within this Policy Statement. No fee is charged for lodging a request for correction.

We will respond to your requests for access or correction as soon as practicably possible, in any event no later than 30 days after receiving your request.

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How do you lodge a complaint?

If you are unhappy with the way your personal information is handled, or if you would like to lodge a complaint about a breach of the Act, APPs or CR Code, or, if you are in New Zealand, the NZ Act, NZPPs, or NZ Code, you have the option of lodging a complaint via Pioneer Credit's Internal Dispute Resolution (IDR) process.

We will acknowledge receipt of your complaint within 7 days from lodgment. A response to your complaint will be sent to you within 30 days (or a different period if agreed by both parties).

You may refer to our website www.pioneercredit.com.au for more information on the IDR process.

What if you are unhappy with the outcome of the IDR?

You have the option of lodging the complaint with the Australian Financial Complaints Authority Ltd (**AFCA**) or with the Office of the Australian Information Commissioner (**OAIC**), or, if you are in New Zealand, the Office of the Privacy Commissioner (**OPCNZ**).

Details for contacting AFCA are as follows:

Australian Financial Complaints Authority Limited
GPO Box 3
Melbourne VIC 3001
Telephone: 1800 931 678 or Facsimile: 03 9613 6399

The OAIC can be contacted at:

The Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992 or Facsimile: 02 9284 9666
Email: enquiries@oaic.gov.au

The OPC NZ can be contacted at:

Privacy Commissioner
PO Box 10 094
The Terrace
Wellington 6143
Telephone (04) 474 7590

Or, refer to the online complaints form at www.privacy.org.nz.

Our contact details:

Pioneer Credit
Attn: Privacy Officer
PO Box 6058
East Perth WA 6892

Telephone: 1300 736 838 (ask to speak with a member of the compliance team)

Email: privacy@pioneercredit.com.au

If you are a Pioneer Credit Shareholder

This section relates to shareholder information only.

As a public listed company on the Australian Securities Exchange, Pioneer Credit collects the personal information of its shareholders, either through the application form completed by you or through its share registry Link Market Services. Personal information of shareholders, which includes information provided upon application are held by Link Market Services and are separate to customer records referred in this Policy Statement.

Pioneer Credit may use and disclose your personal information in the following manner:

- to process your share application and provide services to you as a shareholder
- facilitate dividend payments and other administrative functions
- provide you with updates including Pioneer Credit's annual reports, financial results, information regarding future offers of securities and other disclosures required by law
- your personal information may be disclosed to Pioneer Credit's associated or affiliated companies, outsourced service providers, agents or contractors appointed to provide services to Pioneer Credit or its related, associated or affiliated companies

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- your personal information may also be disclosed to regulators, government agencies or any person to whom such disclosure is required by law or regulatory requirement or pursuant to court order, and
- parties where you have given your consent.

If you do not provide your personal information Pioneer Credit may not be able to process your application. Your personal information will be retained by Pioneer Credit for the duration permitted or required under law.

If you wish to access or correct your personal information held you may do so online via the Link Market Services website at www.linkmarketservices.com.au or contact your broker. For further information you may contact the Company Secretary on 08 9323 5020.

Please refer to the above for information how you may lodge a complaint regarding a breach of privacy.

Changes to this Privacy Policy

We may, from time to time, update this Privacy Policy. The current Privacy Policy will always be visible on our website:

www.pioneercredit.com.au/