

PRIVACY POLICY - PERSONAL INFORMATION

In this document “Zenith Finance”, “we” or “us” means Zenith Finance Pty Ltd ABN 64 072 191 729.

Zenith Finance complies with the Australian Privacy Principles (“APPs”) as contained in the Privacy Act 1988 (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

“Personal information” is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

This policy details how Zenith Finance manages personal information about you. We may update this policy from time to time. A copy of the up to date policy may be accessed at, www.zenithfinance.com.au/generalprivacypolicy.

We have a separate privacy policy about our collection, handling and storage of credit information, available at, www.zenithfinance.com.au/creditprivacypolicy.

We endeavour to collect business information only however, the collection of personal information in some instances is necessary or unavoidable.

What personal information we collect and hold

The kinds of personal information Zenith Finance collects from you or about you depend on the transaction you have entered into with us.

The kinds of personal information that we commonly collect and hold from you or about you includes: your name, address, phone and fax numbers and email address, and in the case of credit applications: date of birth, driver’s licence details, other credit information and details of your employment, and (where applicable) bank account details and credit card details.

When you contact us via a request through our website, we record your name and the contact details you have given to us in that request.

How we collect and hold personal information

We aim to collect personal information directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from letters, emails, faxes, application forms and contracts that you submit to us and telephone calls with us.

In some instances we may receive personal information about you from third parties, such as your accountant, lawyer or financial planner, our associated businesses, allied agencies, suppliers, merchants and referrers.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or

- it is impracticable for us to deal with you on such basis.

However, if you wish to apply for consumer or commercial credit through us, you will need to be identified and cannot be anonymous or use a pseudonym.

We may also collect certain information where you visit or browse our website including through the use of cookies. You may disable cookies by configuring the settings on your browser but this may affect website functionality. Such information does not identify you as an individual, but does log the IP address of your computer.

Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities. For example, we collect, hold, use and disclose your personal information as necessary to source consumer credit or commercial credit for you or your organisation.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide commercial credit that you or your organisation have contracted us to provide.

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, fraud checks, providing you with information about other products offered by us, marketing and promotions, market research, newsletter communications, statistical collation, website traffic analysis and to improve website performance.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including government departments and enforcement bodies) where required or permitted by law.

How we hold and store personal information

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure:

- Data held and stored on paper is stored in lockable filing cabinets contained within locked offices that are secure premises with secured entry.
- Data held and stored electronically is protected by internal and external firewalls and password protected computers.
- Data held and stored “in the cloud” is protected by industry standard security measures applied by our cloud service provider.
- Data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards.

- Where we disclose personal information to third parties (including funders and affiliated businesses), those third parties have in place privacy protection measures.
- Our staff receive training on privacy procedures.

Destruction and De-identification

We will retain your personal information while ever it is required for any of our business functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed or if we determine that the personal information received is required to be destroyed or permanently de-identified.

Overseas disclosure

Currently we do not disclose personal information to overseas recipients.

Australian entities to whom we may disclose personal information as reasonably necessary to perform the tasks you have requested of us:

- might report to related entities located overseas or to obtain services from them in connection with the processing, management or securitisation of consumer or commercial credit facilities;
- will be subject to the Privacy Act and the APPs and have their own privacy protection measures in place.

We may send personal information to overseas recipients where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

Requests for access and correction

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please see our Privacy Access, Correction & Complaints Statement or contact us.

To assist us to keep our records up-to-date, please notify us of any changes to your personal information.

Complaints and Concerns

We have procedures in place for dealing complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs. For further information, please

see our statement on requests for access, correction of personal information and complaints handling.

Contact

Privacy Officer

Zenith Finance Pty Ltd

Level 11, 117 Clarence Street, Sydney NSW 2000

Telephone: 1300 288 874

Email: richard@zenithfinance.com.au