

Respecting your privacy

We respect your personal information, and this Privacy Policy explains how we handle it. The policy covers Akshika Enterprises Pty Ltd ACN 600 970 563 trading as EXI Financial Services. This Policy also includes our credit reporting policy, that is, it covers additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information below as credit information. If you are in a country that is a member of the European Economic Area (EEA), the EU General Data Protection Regulation 2016/679 ('GDPR') governs the way we collect, use, hold, process, and disclose your personal information. Under the GDPR, we are a data controller. We make decisions on how and why your personal information is processed.

What personal information do we collect and hold?

General information

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- other contact details such as social media handles;
- financial details such as your tax file number; and
- other information we think is necessary.

When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws which require us to collect personal information. For example, we require personal information to verify your identity under Australian Anti-Money Laundering law.

What do we collect via your website activity?

If you're an internet customer of ours, we monitor your use of internet services to ensure we can verify you and can receive information from us, and to identify ways we can improve our services for you. If you start but don't submit an online application, we can contact you using any of the contact details you've supplied to offer help completing it. The information in applications will be kept temporarily then destroyed if the application is not completed.

We also know that some customers like to engage with us through social media channels. We may collect information about you when you interact with us through these channels. However, for all confidential matters, we'll ensure we interact with you via a secure forum. To improve our services and products, we sometimes collect de-identified information from web users. That information could include IP addresses or geographical information to ensure your use of our web applications is secure.

How do we collect your personal information?

How we collect and hold your information

Unless it's unreasonable or impracticable, we will try to collect personal information directly from you (referred to as 'solicited information'). For this reason, it's important that you help us to do this and keep your contact details up-to-date. There are a number of ways in which we may seek information from you. We might collect your information when you fill out a form with us, when you've given us a call or used our website. We also find using electronic means, such as email or SMS, a convenient way to communicate with you and to verify your details.

How we collect your information from other sources

Sometimes, we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- we collect information from third parties about the loan or lease made available to you arising out of the services we provide you;
- we can't get hold of you and we rely on public information (for example, from public registers or social media) or made available by third parties to update your contact details; or
- we exchange information with your legal or financial advisers or other representatives.

What if you don't want to provide us with your personal information?

If you don't provide your information to us, it may not be possible:

- for us to give you the credit assistance you seek from us;
- to assist in finding a loan or lease relevant to your circumstances;
- verify your identity or protect against fraud; or
- to let you know about other products or services that might be suitable for your financial needs.

How we collect and hold your credit information

We will collect your credit information in the course of you answering the enquiries we make of you relating to the credit assistance you seek from us. In addition to what we say above about collecting information from other sources, other main sources for collecting credit information are:

- your co-loan applicants or co-borrowers;
- your guarantors/proposed guarantors;
- your employer, accountant, real estate agent, or other referees;
- your agents and other representatives like the person who referred your business to us, your solicitors, conveyancers and settlement agents.

However, we'll never ask you for your security details in this way – if you are ever unsure, just contact us.

- organisations that help us to process credit applications;
- organisations that check the security you are offering such as valuers;
- bodies that issue identification documents to help us check your identity; and
- our service providers involved in helping us to process any application you make for credit through us.

What do we do when we get information we didn't ask for?

Sometimes, people share information with us we haven't sought out (referred to as 'unsolicited information'). Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

When will we notify you that we have received your information?

When we receive personal information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to, and outline how you can access it, seek correction of it, or make a complaint. Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

How do we take care of your personal information?

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- document storage security policies;
- security measures for access to our systems; and
- only giving access to personal information to a person who is verified to be able to receive that information.

We may store personal information physically or electronically with third-party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

What happens when we no longer need your information?

We'll only keep your information for as long as we require it for our purposes. We may be required to keep some of your information for certain periods of time under law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

How we use your personal information

What are the main reasons we collect, hold and use your information?

Collecting your personal information allows us to provide you with the products and services you've asked for. This means we can use your information to:

- give you credit assistance;
- give you information about loan products or related services including help, guidance, and advice;
- consider whether you are eligible for a loan or lease or any related service you requested including identifying or verifying you or your authority to act on behalf of a customer;
- assist you to prepare an application for a lease or a loan;
- administer services we provide, for example, to answer requests or deal with complaints; and
- administer payments we receive, or any payments we make, relating to your loan or lease.

Can we use your information for marketing our products and services?

We may use or disclose your personal information to let you know about other products or services we or a third party make available and that may be of interest to you. We will always let you know that you can opt out from receiving marketing offers. With your consent, we may disclose your personal information to third parties for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organisation.

Yes, You Can Opt-Out

You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will process your request as soon as practicable.

What are the other ways we use your information?

We've just told you some of the main reasons why we collect your information, so here's some more insight into the ways we use your personal information including:

- telling you about other products or services we make available and that may be of interest to you, unless you tell us not to;
- identifying opportunities to improve our service to you and improving our service to you;
- allowing us to run our business efficiently and perform general administrative tasks;
- preventing any fraud or crime or any suspected fraud or crime;
- as required by law, regulation, or codes binding us; and

- any purpose to which you have consented.

What are the grounds which we will deal with your personal information under the GDPR?

Under the GDPR, we must have a legal ground in order to process your personal information. The legal grounds that we may rely on are:

- Performance of our contract with you;
- Compliance with a legal obligation;
- Where you have provided your consent; and
- For our legitimate interests: our main legitimate interests for processing your personal information are: fraud, security, due diligence, business operations, and direct marketing.

How long do you keep your information?

We may be required to retain your information for legal and regulatory purposes, for example under the Australian AML laws, or to respond to a complaint or legal claim. In other cases, we will retain your information only for as long as necessary for the purposes for which we collected it.

How we use your credit information

What information can we exchange with credit reporting bodies?

The Privacy Act allows us to exchange information about you with credit reporting bodies to help us make lending decisions. The information we exchange can include your identification details, what type of loans you have, how much you've borrowed, whether you've met your loan payment obligations, and if you have committed a serious credit infringement (such as fraud).

How do we use credit information?

We use information from credit reporting bodies to confirm your identity, assess your credit applications, manage our relationship with you, collect overdue payments from you, and to help us investigate and report any serious credit infringements.

Who do we exchange your credit information with?

We may exchange your credit information with the following types of entities:

- credit reporting bodies including Equifax, Illion, and Experian;
- our agents, contractors, and external service providers;
- guarantors, co-borrowers, and co-loan applicants;
- debt collection agencies;
- other companies or people to whom we are considering selling all or part of our business; and
- government and regulatory authorities if required by law.

How do credit reporting bodies use your information?

Credit reporting bodies may use the information we provide to maintain a credit information file about you and include your information in reports provided to other credit providers to help them assess your creditworthiness. Some of the information we provide may reflect adversely on your creditworthiness, for example, where you have committed a serious credit infringement. If you believe your credit report contains incorrect information, you have the right to request the credit reporting body to correct the information.

Access to and correction of your personal information

Can I access my personal information?

You can ask us to provide you with access to any personal information we hold about you. In some cases, we may refuse access, such as if the request is frivolous or vexatious, or if providing access would be unlawful or would have an unreasonable impact on the privacy of other individuals. If we refuse your request, we will provide you with written reasons for the refusal.

How do I correct my personal information?

You can ask us to correct any personal information we hold about you that you believe is incorrect, incomplete, or out-of-date. If we agree with your request, we will correct your information promptly. If we do not agree with your request, we will provide you with written reasons for the refusal.

How to make a complaint

What should I do if I have a complaint?

If you have a complaint about how we have handled your personal information, you can contact us using the contact details provided below. We will acknowledge your complaint promptly and investigate it thoroughly. We aim to resolve all complaints within a reasonable timeframe, but if we cannot do so, we will let you know the reasons for the delay.

What if I am not satisfied with the outcome?

If you are not satisfied with our response to your complaint, you can contact the Office of the Australian Information Commissioner (OAIC) or, if your complaint relates to credit information, the Australian Financial Complaints Authority (AFCA).

Contact us

How can I contact EXL Finance?

You can contact us by:

- Phone: [+61 401906668](tel:+61401906668)
- Email: info@exlfinance.com.au