

1. PURPOSE OF THIS POLICY

- 1.1. This Policy details how we comply with the *Privacy Act*, including:
 - 1.1.1. the *APPs*, which regulate how we collect, use, disclose and store *Personal Information* (including *Sensitive Information*); and
 - 1.1.2. the *Credit Reporting Privacy Code* which governs credit reporting.
- 1.2. This Policy does not apply to the collection or use of information about corporations.
- 1.3. If you would like a hardcopy of this Policy, please contact Office Manager on 03 5444 8799.

2. DEFINITIONS

- 2.1. **APPs** means the Australian Privacy Principles introduced under the Privacy Act;
- 2.2. **Credit Related Information** is used in this Policy to describe *Credit Information*, as defined in the *Privacy Act*, including, where the context requires, information obtained from, or given to, *Credit Reporting Bodies*;
- 2.3. **Credit Reporting Bodies** means agencies or organisations that are involved with collecting, holding, using or disclosing Information for the purposes of providing an entity with information about the credit worthiness of an individual;
- 2.4. **Information** is used in this Policy to describe *Personal Information*, *Sensitive Information* and *Credit Related Information* collectively;
- 2.5. **Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
 - 2.5.1. whether the information or opinion is true or not; and
 - 2.5.2. whether the information or opinion is recorded in a material form or not;
- 2.6. **Privacy Act** means the Privacy Act 1988 (Cth) as amended from time to time;
- 2.7. **Sensitive Information** includes things such as race, sexual orientation, political opinions, members of a trade association or trade union, criminal record and health, genetic and biometric information.

3. THE TYPE OF INFORMATION WE COLLECT

- 3.1. **Personal Information & Sensitive Information**
Personal and *Sensitive Information* that we collect and hold is information that is reasonably necessary for us to provide the services associated with MGR to you.
While the type of *Personal Information* and *Sensitive Information* we collect and hold may vary, generally it will include the following:
 - 3.1.1. your first and last name;
 - 3.1.2. contact information, such as work related telephone numbers and e-mail addresses;
 - 3.1.3. username and passwords;
 - 3.1.4. communication preferences.
- 3.2. **Credit Related Information**
The type of *Credit Related Information* we collect and hold includes:

- 3.2.1. scores, ratings, summaries, evaluations and other information relating to your credit history;
- 3.2.2. certain administrative information relating to credit;
- 3.2.3. information which has bearing on your creditworthiness, such as:
 - 3.2.3.1. insolvency information;
 - 3.2.3.2. credit infringement information;
 - 3.2.3.3. court judgments made in relation to your past or present credit arrangements.

4. COLLECTION

We collect *Information* only by fair and lawful means where it is reasonable and practicable to do so.

If you do not provide us with *Information* we reasonably request, we may not be able to provide you with all, or any, of the services offered by MGR. We also may not be able to provide you with the information about MGR that you may want.

4.1. How we Collect Information

4.1.1. We collect Information that you provide:

- 4.1.1.1. when visiting our website at www.mgrit.com.au;
- 4.1.1.2. through enquiries you lodge with us;
- 4.1.1.3. during telephone, or in person, conversations with us;
- 4.1.1.4. through transactions conducted with us; and
- 4.1.1.5. in written correspondence to us (including email correspondence).

4.1.2. We also collect *Information* provided by third parties when it is necessary for a specific purpose, such as checking *Information* that you have given us or where you have consented, or would reasonably expect us, to collect your *Information* in this way.

4.1.3. If it is unclear to us whether you have consented to the collection of *Information* from a third party, we will take reasonable steps to contact you to ensure that you are aware of the reason and purpose of the collection.

4.1.4. If we collect *Information* from a third party, if it is reasonably possible we will inform you that the *Information* has been collected and the circumstances of the collection.

4.1.5. We will also collect *Information* about you if we are required to do so under an Australian law. If so, we will inform you of this, including details of the law requiring the collection.

4.1.6. We may also collect *Information* about you from a range of publicly available sources including newspapers, journals, directories, the internet and social media sites.

4.2. Internet Usage

It is important that you understand that there are risks associated with use of the internet and you should take all appropriate steps to protect your *Information* when visiting our website www.mgrit.com.au

You can contact us by mobile telephone or post if you have concerns about making contact via the internet.

We may use cookies when you visit our website www.mgrit.com.au and, as a consequence, we may collect certain *Information* from you such as:

- 4.2.1. your location;
- 4.2.2. information about when and how you use our website;
- 4.2.3. your computer, device and connection information, such as your IP address, browser type and version, operating system, mobile platform and unique device identifier and other technical identifiers; and
- 4.2.4. information about your past internet usage.

You can manage the use of cookies by clicking “help” on the toolbar in your internet browser. However, if you block the use of cookies, you may not be able to log in or make full usage of our website.

4.3. **Unsolicited Information**

Where we receive unsolicited *Information* about you, we will check whether that *Information* is reasonably necessary for our functions. If it is, we will handle this *Information* in the same way we do other *Information* we seek from you. If not, we will destroy or de-identify it.

5. REASON FOR COLLECTION & USE

5.1. **Personal Information**

We may use and disclose your *Personal Information* for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose and in other circumstances authorised by the *Privacy Act*.

Generally, we use and disclose your *Personal Information* to:

- 5.1.1. provide you access to the services offered by MGR;
- 5.1.2. communicate with you and assist you with enquiries;
- 5.1.3. comply with our legal obligations, resolve disputes, and enforce our agreements;
- 5.1.4. help us manage, administer, monitor, improve and enhance our service standards;
- 5.1.5. gain an understanding of your needs;
- 5.1.6. respond to requests, inquiries, complaints or applications;
- 5.1.7. update you on relevant new services and benefits;
- 5.1.8. personalise the service and to select content to be communicated to you or to use features on the service such as sharing content with a friend or colleague;
- 5.1.9. deal with funding, planning, evaluation and complaint-handling purposes;
- 5.1.10. communicate with individuals by various means about our services, events, offers and options available;
- 5.1.11. charge, bill and collect debts;
- 5.1.12. assess job applications;
- 5.1.13. verify an individual’s identity;
- 5.1.14. ensure the health and safety of our staff and individuals who use our services;

- 5.1.15. comply with quality assurance or audit activities;
- 5.1.16. undertake accreditation activities;
- 5.1.17. address liability indemnity arrangements and reporting;
- 5.1.18. prepare the defence for anticipated or existing legal proceedings; and
- 5.1.19. conduct experience surveys.

5.2. Sensitive Information

We will not collect *Sensitive Information* about you unless:

- 5.2.1. we obtain your explicit consent to collect and use such *Sensitive Information*;
or
- 5.2.2. the *Sensitive Information* is reasonably necessary for one of our functions or activities; or
- 5.2.3. the collection of the *Sensitive Information* is required or authorised by or under Australian law or a court/tribunal order; or
- 5.2.4. a permitted general situation exists in relation to the collection of *Sensitive Information* by us; or
- 5.2.5. a permitted health situation exists in relation to the collection of the *Sensitive Information* by us.

5.3. Credit Related Information

5.3.1. We collect, use and hold your *Credit Related Information*:

- 5.3.1.1. to determine payment terms for the services we provide;
- 5.3.1.2. for day to day administration purposes; and
- 5.3.1.3. to satisfy our legal obligations.

5.3.2. In addition, we use *Credit Related Information* that we obtain from *Credit Reporting Bodies* to derive information in relation to your creditworthiness and eligibility for credit. This is known as "*Credit Eligibility Information*".

5.3.3. We may disclose *Credit Related Information* about you to *Credit Reporting Bodies* and debt collection companies where you are in payment default. We will only make a disclosure in these circumstances if we have given you written notice of our intention to disclose and at least 14 days has passed since giving you such notice.

The types of *Credit Related Information* that we may disclose includes:

- 5.3.3.1. identification information; and
 - 5.3.3.2. information that you have defaulted on a payment due to us and the amount and details of the default.
- 5.3.4. Subject to paragraphs 5.3.1, 5.3.2 and 5.3.3, we will not disclose *Credit Related Information*, including *Credit Eligibility Information*, about you unless you have authorised the disclosure or it is otherwise in accordance with the law.

6. DISCLOSURE

6.1. To whom do we disclose Information?

We may disclose an individual's *Information* to the following third parties for the above purposes to:

- 6.1.1. our insurers and legal representatives; and
- 6.1.2. service providers engaged to provide services to us.

6.2. **Disclosure to Related Entities**

We may disclose *Information* to our related entities, including entities in the MGR Advisory group.

7. **MARKETING**

We may use and/or disclose your *Information* in order to:

- 7.1. provide you with news and information about MGR;
- 7.2. provide you with marketing and promotional material that we believe you may be interested in; or
- 7.3. seek your feedback on our services.

Only with your express consent will we use or disclose *Information* about you for the purposes of direct marketing. You can ask us not to do this at any time by writing to the Office Manager at mgr@mgr.com.au.

We will not sell your *Information*.

8. **SECURITY & MANAGEMENT**

We take reasonable steps to protect your *Information* against misuse, interference, loss, unauthorised access, modification and disclosure. The protective steps we take include:

- 8.1. document and data storage security policies;
- 8.2. security measures for restricted access to our systems; and
- 8.3. deletion, destruction or de-identification of *Information* where it is no longer required by us.

The management of your privacy settings can be requested by contacting the system's administrator at 03 5444 8799.

9. CORRECTION

We aim to ensure that the *Information* we hold is accurate, complete and up-to-date. We encourage you to contact us in order to update any *Information* we hold about you. Our contact details are set out at the end of this Policy.

If you contact us regarding an apparent inaccuracy in relation to your *Information* and we are satisfied that the *Information* is inaccurate, out-of-date, incomplete, irrelevant or misleading, then reasonable steps will be taken to correct the *Information* within 30 days, or a longer period as we agree with you in writing.

We will not charge you for a correction.

If we determine that the correction is not required, we will provide you with written notice stating the reasons why the correction was not made and refer you to our complaints procedure.

If a correction is made to any *Information* that was previously disclosed to a third party, as long as it is reasonable to do so, we will give each such recipient written notice of the correction within a reasonable period. We will also notify you that the correction has been made.

10. ACCESS TO YOUR INFORMATION

You are entitled to access your *Information* held by us.

If you wish to access your *Information*, you must lodge a request for access by contacting the Office Manager on 03 5444 8799.

We may charge a fee to cover our reasonable costs in meeting an access request. You will be provided with access to your *Information* within 30 days of the request (unless unusual circumstances apply).

We are not required to give you access to your *Information* if:

- 10.1. it would be unlawful to do so; or
- 10.2. denying access is required or authorised by an Australian law or a court/tribunal order; or
- 10.3. to do so would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If we do not give you access to your *Information* you will receive written notice that explains the reason for the refusal.

11. COMPLAINTS

Complaints about alleged breaches by us of the *Privacy Act* or this Policy can be made by contacting the Office Manager on 03 5444 8799.

If you do not consider that your complaint has been adequately dealt with by us, you may make a further complaint to the Office of the Australian Information Commissioner, which has complaint handling responsibilities under the *Privacy Act*.

12. ACCESS TO THIS POLICY

This Policy will be reviewed from time to time to take account of new laws and technology and changes to our operations and practices.

The most current version of this Policy will be uploaded to our website at www.mgrit.com.au or can be obtained by contacting our Office Manager:

E-Mail: mgr@mgr.com.au

Phone: 03 5444 8799

Postal Address: PO Box 793, Bendigo Victoria 3552

13. FURTHER INFORMATION

If you have any questions about privacy-related issues please contact our Office Manager.

For further information about privacy, the protection of privacy and credit reporting can also be found on visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au.