

SCOTPAC EXTERNAL PRIVACY POLICY

In handling your personal and financial information, Scottish Pacific Business Finance Pty Ltd (ABN 79 008 636 388) and its related bodies corporate, including Integral Collections Pty Ltd (ABN 37 143 757 117) and Business Fuel Finance Pty Ltd (ACN 629 419 021) ('ScotPac', 'us', 'we', 'our') are committed to complying with, to the extent applicable:

- (a) the Privacy Act 1988, and the Spam Act 2003 which sets out Australia's spam rules; and
 - (b) the Privacy Act 2020 (NZ) and the Information Privacy Principles and the Unsolicited Electronic Messages Act 2007 which sets out New Zealand's spam rules,
- (together 'Privacy Law')

In Australia we are also bound by Division 3 of Part IIIA of the Privacy Act, and the Privacy (Credit Reporting) Code, and in New Zealand we are bound by the Credit Reporting Privacy Code 2020 (NZ), which regulate the handling of credit information, credit eligibility information and related information by credit providers.

Over the course of our relationship with you, we may collect and hold additional personal information about you, including account or transactional information, opinions, complaints or enquiries about our products or services.

From time to time, we will need to update our privacy policy. Please visit our website at www.scotpac.com.au (for Australia) or www.scotpac.co.nz (for New Zealand) regularly to ensure that you can always find the most up to date version.

1. What Personal Information Do We Collect?

When you apply for one of our products or services, ScotPac may request personal information about you. We also collect personal information from guarantors, debtors, associates, prospective employees, contractors, suppliers, brokers, introducers, merchants, agents, professional advisers, mercantile agents, mailing houses, call centre operators, archivers and service providers.

ScotPac will only collect certain personal information about you as it pertains to that product or service. Wherever possible, the personal information we collect (including credit information) is provided by you directly.

There are many ways we seek personal information from you. We might collect your information when you:

- enquire about, apply for, or use our products or services
- contact us to make an enquiry or give us feedback
- visit our websites or use our digital services
- participate in other activities we offer, such as competitions or surveys
- talk to us or do business with us
- use our Partner Portal
- make a job application to Scotpac.

In addition, a broker may disclose your details to Scotpac as part of a loan application or enquiry.

In some circumstances, however, we may collect personal information about you from third parties such as joint facility owners, referees nominated by you, your agents, representatives and other persons authorised by you such as lawyers or accountants, and other credit providers and credit reporting bodies.

We may also collect, use and disclose your personal information to meet our legal obligations, assisting government and enforcement bodies or regulators, or where otherwise required or authorised by law, or an order of a court or tribunal.

For Australia these laws include:

- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 which requires us to collect personal information about you when verifying your identity;
- Personal Property Securities Act 2009 under which we may need to collect personal information about you to record a security interest on the Personal Property Securities Register; and
- Company and Tax Laws such as the Corporations Act 2001, the Tax Administration Act 1953, the Income Tax Assessment Act 1997, and the Australian Securities and Investment Commission Act 2001 as those laws are amended and includes any associated regulations.

For New Zealand these laws include

- the Anti-Money Laundering and Countering Financing of Terrorism Act 2009;
- the Personal Property Securities Act 1999; and
- New Zealand purposes, the Companies Act 1993 and the Income Tax Act 2007.

The Personal Information which we collect and hold about you may include:

- identifying information to enable us to verify your identity, such as your name, title, date of birth, current and previous addresses, postal or email address and/or telephones numbers;
- government issued identifiers which may include a Tax File Number, Passport number, Medicare number or Driver's License number;
- account and/or credit card details;
- the note/s we make of the disclosure of credit information we make to a credit reporting body so we can obtain credit information;
- when you visit our website, we may collect information about your location or activity (including IP address and top-level domain name, type of browser you are using and whether you have accessed third party sites), in relation to your visit;
- other contact information such as social media handles and cookies left by your browser;
- an opinion, comment, compliment or complaint about our products or services;
- the purpose for you applying for a product or service; and
- credit information such as credit history, the type of credit sought, credit capacity and eligibility for credit.
- we may obtain information about your loan or a guarantee of the loan from another organization
- we check property, you offer as security, through public registers or its service providers;

The personal information (other than credit information and credit reporting information) we collect and hold varies depending on the person we are dealing with and the reason why we are dealing with them.

2. What is Personal Information and Sensitive Information

The Privacy Act 1998 (Cth) (Privacy Act) defines types of information, including Personal Information and Sensitive Information (and to the extent applicable, includes the meaning given to that term in the Privacy Act 2020 (NZ)).

Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "Personal Information" and will not be subject to this privacy policy.

Sensitive Information is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious

or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by us only:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose; and
- (c) with your consent or where required or authorised by law.

3. How We Collect Your Personal Information

- We may collect Personal Information from you whenever you input such information into our Websites, over the phone or provide it to Us in any other way.
- We may also collect cookies from your computer which enable us to tell when you use our Websites and also to help customise your Website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.
- Where reasonable and practicable we collect your Personal Information from you only. However, sometimes we may be given information from a third party, in cases like this we will take steps to make you aware of the information that was provided by a third party.

4. Purpose of Collection

We collect personal information directly from you before, during or after the provision of products and services to you and when you inform us of any change to the information we hold about you.

When providing credit to you, this may include verifying your identity and assessing your application for commercial credit or to be a guarantor for the applicant, assessing your credit worthiness, managing your facility or the arrangements under which your facility is funded or collecting overdue payments.

If you do not provide the requested personal information, ScotPac may not be able:

- to consider your application for credit or provide other services;
- to provide you with the product or service you want;
- to manage or administer the loan for you;
- to 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.

We also collect your personal information from others including:

- when you transact on your account/s and/or visit our Websites;
- credit reporting bodies, brokers, introducers public registers and as required by relevant laws or with your specific consent in managing our business; and
- organisations with whom we have an alliance or agreement for the purpose of promoting our respective products or services and agents used by us and our business partners in administering such an alliance or agreement.

We use your personal information when:

- considering your requests for products, services and other benefits;
- providing you with products, services and other benefits or special offers;
- executing your instructions;
- providing you with information about other products and services that may be of interest to you;
- assisting other organisations with whom we have an alliance or arrangement with their processes and systems
- to provide products and services to you;
- conducting research and development for our products, and services;
- collecting overdue payments due under our credit products;

- managing our rights and obligations regarding external payment systems;
- direct marketing;
- managing your facilities, including handling your concerns or complaints or any legal action;
- to identify, prevent or investigate any fraud, unlawful activity or misconduct or suspected fraud, unlawful activity or misconduct;
- maintaining and developing our business systems and infrastructure; and
- as required by relevant laws, regulations or codes of practice.

If you start an online application form but do not submit it or you submit an application (whether electronically or otherwise) but do not proceed with the application, we may use your personal information to contact you regarding your application.

5. Credit Information and Credit Eligibility Information

When you apply for a credit related product, in addition to the above, we may collect, hold, use and where appropriate, disclose 'credit information' as defined in Privacy Law for the purposes of assessing your eligibility for credit.

This may also include information from credit reporting bodies about guarantors, debtors and associates. We only obtain information to the extent we are entitled to under Privacy Law.

The type of credit information we may collect, hold, use and where appropriate disclose, includes:

- if the individual is a client, information to determine if we should provide a facility which includes the provision of commercial credit to the individual, their application for credit with us and the amount, that we are a current credit provider to that individual, to deal with or enforce our rights under the guarantee and any security which may be given to secure it;
- if the individual is a guarantor, information to determine whether we should accept a guarantee from the individual and if the guarantee is given, to deal with or enforce our rights under the guarantee and any security which may be given to secure it;
- if the individual is a debtor, information required to assess and verify the debt which the client sells to us or in which the client gives us a security interest, to collect the debt and to enforce the debt and any security which may be given to secure payment of the debt;
- if the individual is an associate of the client, information to determine if we should provide a facility which includes the provision of commercial credit to the client and to assist in the provision of that facility;
- if the individual is an associate of the debtor, information to assist us to verify the debt owed by the debtor and to collect and enforce the debt;
- to assist in the management and enforcement of the facilities we provide, data analysis of your account and collection of any outstanding payments;
- the names of any credit providers that have provided you with credit and the type and limit of that credit;
- the day on which credit was made available to you and (if relevant) discharged;
- advice that payments previously notified as unpaid are no longer overdue;
- information about your repayment history (e.g. whether you made repayments on time, missed a payment or that you defaulted on a credit payment) including payments overdue and for which collection action has started;
- any court judgments made against you that relate to credit provided to you, or applied for by you;
- certain information about you on the National Personal Insolvency Index, including bankruptcy and debt agreements;
- commercial credit reports containing information about you from a credit reporting body;
- uses which are required or authorised by law, and otherwise in accordance with the consents and authorities you give in your credit application;

- other information about credit standing, worthiness, history or capacity that credit providers can disclose under the Privacy Act; and
- any personal information about you from any referees (where applicable) that you may provide.

We may also hold credit eligibility information (for example credit scores, risk ratings and other evaluations) that we derive from the information obtained from a credit reporting body. The information we receive from a credit reporting body or information we derive from such information is known as 'credit eligibility information'.

We may use a loan servicer to process any loan applications with or without our involvement. Such loan servicer will be able to provide you their own privacy policy and how they handle and collect your personal or other information. This may be required to assess your credit eligibility and/or process your credit application. We may also share your personal information with them for the primary reason you provide this information to us. Currently we are using 'Mortgageport' as our 'home loan product(s)' servicer. Their contact details are mentioned below;

For Australia and New Zealand:

Mortgageport
Level 2, 80 Pacific Highway,
North Sydney NSW 2060

Or mail to: PO Box 1230 North Sydney NSW 2059

Credit Information Disclosure

When assessing your eligibility for credit and at other times, we collect and may disclose information about you to a credit reporting body if you are applying for credit, you have obtained credit from us, if you guarantee or are considering guaranteeing the obligations of another person to us or you are a director of a company that is a client or guarantor.

The information we might collect about you and disclose to one or more credit reporting bodies may include:

- Identification information;
- Personal information relating to commercial credit;
- Default information;
- Publicly available information;
- Personal insolvency information;
- Serious credit infringements;
- Court proceedings information (other than criminal proceedings) that relate to any credit that has been provided to, or applied for by, the individual;
- Payment information; and
- New arrangement information.

When we give your information to a credit reporting body, it may be included in reports that the credit reporting body gives other organisations (such as other lenders) to help them assess your credit eligibility.

Some of that information may reflect adversely on your credit eligibility, for example, if you fail to make payments or if you commit a serious credit infringement (like obtaining credit by deception). That sort of information may affect your ability to obtain credit from other financial service providers.

The contact details of the credit reporting bodies, we use are outlined below. Each credit reporting body has a credit reporting policy about how they handle your information. You can obtain copies of these policies on their websites.

For Australia:

Equifax Pty Ltd

Website: www.equifax.com.auMail: Equifax
PO Box 964
NORTH SYDNEY NSW 2059**Creditor Watch**Website: www.creditorwatch.com.auMail: Creditor Watch,
GPO Box 276,
SYDNEY, NSW, 2001.**For New Zealand:**

Equifax Pty Ltd

Website: www.equifax.co.nzMail: Equifax
Private Bag 92156, Victoria Street,
Auckland 1142**Creditor Watch**

(Please use the same contact details for Australia, listed above)

We will only disclose your credit information as permitted by the Privacy Law. Your credit report information will only be disclosed to authorised representatives of ScotPac and other third parties with your prior consent.

Bank Feed Information

When assessing applications for commercial credit and managing loans, we use bank feed information supplied to us by Illion. When you lodge an application for commercial credit, you are referred to Illion's secure platform where you are required to provide your internet banking login information. Once you have logged into your online bank account(s), Illion, as our agent, accesses your bank account transaction history, usually for the most recent 12 months on the date you apply for a loan, in addition to further ongoing bank transactions for the term of the loan, for the purpose of assessing any future loan application or making a future offer to you.

Our access to the bank feed information supplied by Illion is "read only" and we are able to see, from the bank feed information supplied by Illion, your account names, balances and transaction details. This information assists us to assess your application for commercial credit and manage your loans both now and in the future.

Information about Illion's privacy practices and procedures is available in its Privacy Policy available here: <https://www.illion.com.au/privacy-policy-risk-marketing-solutions/>.

6. Information about credit reporting bodies

Credit reporting bodies collect credit information about individuals which they provide as credit reports to credit providers and others in the credit industry to assist them in managing credit risk, collecting debts and other activities.

"Credit pre-screening" is a service for credit providers wishing to send direct marketing material about credit services. A credit reporting body uses information it holds to screen out individuals who do not meet criteria set by the credit provider.

Credit reporting bodies are required to maintain a confidential list of individuals who have opted out of their information being used in pre-screening. To opt out of credit pre-screening, contact the credit reporting body, using the contact details on their website.

You can ask a credit reporting body not to use or disclose your personal information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud.

7. Who We Can Disclose Your Personal Information To

In general, we do not use or disclose your personal information (including credit-related information) for a purpose other than:

- set out in this Privacy Policy;
- otherwise disclosed to you to which you have consented;
- required or permitted by law; or
- what you would reasonably expect.

For the purpose of providing products and services to you and managing our business, we may disclose your personal information to:

- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, printing and mailing houses, administrative and operational services and research consultants;
- external organisations that are our assignees, agents or contractors;
- professional advisers, such as accountants, lawyers, advisory firms and auditors;
- credit reporting bodies, including disclosing that you are in default under a credit agreement or have committed a serious credit infringement, if that is the case. A credit reporting body may include information about you in reports that it gives other organisations (like other lenders) to help them assess your credit worthiness;
- organisations involved in debt collecting;
- fraud reporting agencies (including organisations that assist with fraud, investigations and organisations established to identify, investigate and/or prevent any fraud, crime or misconduct of a serious nature);
- information technology service providers including those who assist or support us with loan management, the maintenance, review and development of our business systems, data storage, processing and software development;
- other financial institutions, including other credit providers and their professional advisors or a credit reporting body (for example, exchanging credit information about you with other credit providers, and exchanging credit information about you with any credit reporting body and any other providers of credit to you named in your credit application or a credit report from a credit reporting body);
- organisations with whom we have an alliance, loyalty program or other agreement for the purpose of promoting our respective products or services and agents used by us and our business partners in administering such an alliance or agreement;
- your representative, for example, lawyer, insurer, other financial institution, financial adviser or agent, your executor, administrator, trustee, guardian or power of attorney, your employer, referees and other person authorised by you or to the extent deemed necessary by ScotPac in order to deliver any instruction you give us;
- any introducer, dealer or broker referred to in an application;
- other lenders or financial institutions, like banks;
- insurers;
- organisations that are involved in debt collection or in purchasing debts;
- any agent or contractor of ours assisting in processing an application;
- other entities involved that may be involved in a securitisation arrangement which we use to fund your facility, including without limitation other credit providers;
- law enforcement bodies and courts; and

- government and regulatory authorities, such as the Australian Transaction Reports and Analysis Centre (AUSTRAC), Australian Taxation Office (ATO) and the Australian Securities and Investments Commission (ASIC), if required or authorised by or under Australian or New Zealand law. In few instances these authorities share information with relevant foreign bodies.

8. Accuracy

If you believe your information is incorrect, incomplete or not current, you can request that we update this information by emailing us at privacy@scotpac.com.au (for Australia) or privacy@scotpac.co.nz (for New Zealand).

9. Electing To Opt Out

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

You can make this request by using the unsubscribe option in the relevant email or SMS, or emailing us at privacy@scotpac.com.au (for Australia) or privacy@scotpac.co.nz (for New Zealand).

10. Complaint Procedure

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information (including credit information or credit eligibility information), please contact us using the details at the end of this policy.

You may also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

We will investigate further and respond to you.

If you still feel your issue has not been resolved, you can contact the Office of the Australian Information Commissioner (OAIC) (for Australian customers) or the Office of the Privacy Commissioner (OPC) (for New Zealand customers) who deal with privacy complaints.

Please note the OAIC and the OPC require that any complaint be first made to the respondent organisation. The law also allows 30 days for the respondent organisation to deal with the complaint before a person may make a complaint to the OAIC or the OPC.

- For Australia, the Office of the Australian Information Commissioner can be contacted at:
- Post: GPO Box 5218
- Sydney NSW 2001
- Telephone: 1300 363 992
- Email: enquiries@oaic.gov.au
- Website: www.oaic.gov.au

For New Zealand, the Office of the Privacy Commissioner can be contacted at:

- Post: PO Box 10 094
- Wellington 6143
- Telephone: 0800 803 909
- Email: enquiries@privacy.org.nz
- Website: www.privacy.org.nz

11. Foreign Disclosure

We may disclose your personal information to a recipient located outside the country you are located in. This may include the following:

- ScotPac Group companies located in Australia, China, Hong Kong, Singapore and New Zealand;
- our contracted service providers operating overseas, which are likely to be located in Australia, New Zealand, US, Germany and the UK;
- for international transactions, such as currency exchanges, we may need to disclose your information to the corresponding international party in order to process the transaction.

The countries we may disclose your information to will depend on the details of the transaction you ask us to carry out..

12. How to contact us about privacy

If you have any queries, or if you seek access to your Personal Information, or if you have a complaint about our privacy practices, you can contact us by:

- submitting an online Feedback/Complaints form at www.scotpac.com.au (for Australia) or www.scotpac.co.nz (for New Zealand)
- calling us on 1300 505 883 (for Australia) or (+64) 0800 726 872 (for New Zealand)

If you contacted us by phone or in person and feel your issue still has not been resolved; the next step is to contact our dedicated Privacy Officer at:

Scotpac Australia's contact details

- The Privacy Officer
- Scottish Pacific Business Finance
- GPO Box 9969,
- Melbourne VIC 3001
- Telephone: 1300 505 883
- Email: privacy@scotpac.com.au

Scotpac New Zealand's contact details

- The Privacy Officer
- Scottish Pacific Business Finance
- PO Box 106-047, Auckland 1143
- Telephone: (+64) 0800 726 872
- Email: privacy@scotpac.co.nz