



Argenic

Privacy Policy of Argenic Pty Ltd ACN 663 970 812

Effective Date: 30th October 2023

About us

We are Argenic Pty Ltd (ACN 663 970 812) ("Argenic", "we", "us", "our"), operating as an authorised representative (AFS Re No. 001300456) of The Clever Fox Pty Ltd (ACN 601 295 112), which holds AFSL 481914.

Protecting your privacy is important to us

We are committed to protecting and respecting your privacy in accordance with our obligations under the Privacy Act 1988 and the Australian Privacy Principles (the "APPs").

We will endeavour to:

- only use your information for the purposes described in this privacy policy (the "Privacy Policy");
- always keep your information safe and private in accordance with this Privacy Policy;
- allow you to manage and review your personal information and marketing choices at any time; and
- never sell your information.

This Privacy Policy explains:

- The kinds of personal information (including credit-related information) we collect;
- The purposes for which we collect this information;
- How we manage the personal information that we collect about you;
- How you can seek access to and correct that information; and
- If necessary, how you can make a complaint relating to our handling of that information.

This Privacy Policy does not limit our rights and obligations under Privacy Laws.

This Privacy Policy is not limited to current customers or guarantors of customers (where applicable) – it relates to all other individuals who deal with us, whether in relation to the provision of credit or otherwise. By using our services or otherwise dealing with us, you are deemed to agree to our Privacy Policy.

If you have concerns about how we use your personal information, you can contact us at support@argenic.com

Information We Collect from you

When we collect Personal information:

We collect information about you and your interactions with us, for example, when you enquire, apply for, request or use our products or services, make a card payment or transfer money, phone us or visit any of our websites. When you use our website or mobile applications, we may collect information about your location or activity including your IP address, telephone number and whether you've accessed third-party sites. Some of this website information we collect using cookies.

This may include information collected directly from you and information that you authorise us to collect from third parties.

It is not mandatory for you to provide us with the personal information that we request – however if you do not do so it may affect the products and services that we can provide to you.

The Personal Information we collect

We will collect certain personal information about you depending on the circumstances in which the product or service is being applied for or provided.

This information can include:

- Key personal information such as your name, residential and business addresses, telephone numbers, email and other electronic addresses;
- Financial and related information, such as your occupation, accounts, bank account information (from prior to the loan being granted and ongoing for the term of the loan), assets, expenses, income, revenue, dependents, and regarding your employment, financial and business dealings and other relevant events;
- Your transaction history (with us and our associates or relevant third parties). This information includes products you may have used with us in the past, your payment history, and the capacity in which you have dealt or deal with us; and
- Other relevant information – depending on the circumstances this may also include your gender, marital status and health and medical information, membership of professional bodies, tax file number information and other government identifiers (e.g. if relevant for insurance purposes or to identifying you).

Information we collect from others

We collect information about you from others such as service providers, agents, your bank, advisers, brokers, employers or family members. For example, if you apply for credit, we may need to obtain a credit report from a credit reporting body. We will also obtain bank account information from your bank throughout the term of the loan. We may collect information about you that is publicly available, for example, from public registers or social media, or made available by third parties.

If you elect to use bank statements and third party account aggregation service providers in connection with our assessment of your application, you permit such third party services to access your banking transaction data linked to the online banking credentials you provide. The third party service provider will access your personal information for the purpose of providing this personal and business bank account data to us

The third party service provider may access transactional data from any account that is associated with the login credentials that you submit. This may include personal accounts as well as business accounts. Your provision of banking login credentials to utilise such third party service providers does not provide us with your login credentials or passwords or the ability to access your internet banking (other than as stated above).

Through the use of such third party service providers, we will obtain bank transactions 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. We note that your bank's terms may prohibit you from sharing your login, so you agree to appoint our third party service provider as your agent to access your internet banking on your behalf solely for this purpose and you consent to our ongoing access to this information for the term of the loan and the purposes outlined above.

Should you agree to the use of such a third party service provider, you will be subject to their terms and conditions and privacy policy which will govern any act or omission of that third party service provider in connection with your use of that service.

Sensitive information

We may collect your sensitive information after we ask for your consent to collect it except where otherwise permitted by law. The kinds of sensitive information we may collect are:

- biometric templates (such as a photo of your face for identity verification purposes or any photos you upload to our applications);
- racial or nationality information; and
- health information that's collected on insurance or hardship applications

Information about other people

If you provide any personal information to us about another person, you confirm that you have the authority of that person to share their information with us and to permit us to hold, use and disclose their information in accordance with this Privacy Policy. You must inform them of their rights to access and request correction of their information set out below.

How do we collect your information?

We collect information about you when you:

- fill in application forms or open an account for any of our Products or Services
- register to use the Argenic Payment System;
- correspond with us;
- submit credit assessment documents;
- take part in online discussions, surveys or promotions;
- communicate with a member of our customer support team;
- contact us for any other reasons.

How do we use your information?

We use your information to:

- Establish your identity and assess applications for products and services;
- Determine your eligibility for, and comply with our obligations under, the Australian Government's Coronavirus SME Guarantee Scheme (if applicable) or New Zealand Business Finance Guarantee Scheme (if applicable);
- Price and design our products and services;
- Administer our products and services, including assessing whether to make any future offer to you, and generally carry out our business functions and activities or disclose your information to a third party with a product or service that may be reasonably of interest to you;
- Manage our relationship with you, including fulfilling our obligations and exercising our rights under any agreement with you;
- Conduct and improve our businesses and improve our customers' experience;
- Manage our risks and help identify and investigate illegal activity, such as fraud;
- Contact you, for example to invite you to review our products and services, if we suspect fraud on your account or need to tell you something important;
- Comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (NZ);
- Comply with our legal obligations and assist government and law enforcement agencies or regulators; and
- For identification and provision of products or services offered by us, any of our TPA Group members or any third parties that may reasonably be of interest to you (refer to section 3.1 below).

We may also collect, use and share your information in other ways where you have authorised us to do so or where permitted by law.

Further Use of Information

Analytics and Aggregated Data: We may analyse non-personally identifiable information to better understand user behaviour and preferences, and to improve our Service. Aggregated data that does not personally identify you may be used for research, marketing, and other business purposes.

Improvements in technology enable organisations to collect and use information to get a more integrated view of customers and provide better products and services. We may combine our customer information with information available from a wide variety of external sources (for example census or Bureau of Statistics data). We are able to analyse the data in order to gain useful insights which can be used for any of the purposes mentioned earlier in this policy. In addition, TPA Group members may provide data insights or related reports to others, for example, to help them understand their customers better. These insights and reports are based on aggregated information and do not contain any information that identifies you.

Direct Marketing: We may use your information for direct marketing, including by email or other electronic means. If you no longer want to receive direct marketing, you can tell us by using any of the methods set out at 'Contact Us' below.

Legal Compliance: We may use and disclose your personal information to comply with applicable laws, regulations, legal processes, or enforceable governmental requests.

Data Sharing and Disclosure

Service Providers: We may engage trusted third-party service providers to assist us in delivering the Service, such as hosting, payment processing, data analytics, and customer support. These service providers are contractually bound to protect your information and are prohibited from using it for any other purpose.

Business Transfers: In the event of a merger, acquisition, or sale of assets, your personal information may be transferred as part of the transaction. We will notify you before your information becomes subject to a different privacy policy.

Legal Requirements: We may disclose your personal information if required by law or in response to a valid legal request, such as a court order or government inquiry.

Third Parties: We may share your information with third parties where this is permitted or required by law, or for any of the purposes mentioned above.

Third parties include:

- Your co-applicant(s) (if any);
- Associated entities of Argenic based in Australia or overseas;
- Entities that provide services to us such as, identity verification, mailing houses or call centre operators;
- Service providers, for example law firms, market research / data providers, and loyalty program redemption partners;

- Service providers to whom we outsource certain functions, for example, direct marketing, customer review tools, statement production, debt recovery and information technology support, some of whom may contact you on our behalf;
- Brokers, agents and advisers and persons acting on your behalf, for example guardians or persons holding power of attorney;
- References that you provide to us, for example landlord details or trade references;
- The supplier of any goods or services financed with credit we provide;
- Guarantors or any person providing security for any service;
- Persons involved in arrangements that provide funding to us, including persons who may acquire rights to our assets (for example loans), investors, advisers, trustees and rating agencies;
- Claims-related providers, such as assessors and investigators, who help us with claims;
- Other financial institutions such as banks and credit providers or their authorised representatives or partners, or another third-party organisation or partner, including where such entities provide products and/or services that may reasonably be of interest to you;
- Auditors, insurers and re-insurers;
- Employers or former employers;
- Government and law enforcement agencies or regulators (including but not limited to the Department of the Treasury or other relevant agency of the Commonwealth of Australia in relation to the Australian Government's Coronavirus SME Guarantee Scheme (if applicable), or the Crown or other relevant Government agency in relation to the New Zealand Government's Business Finance Guarantee Scheme (if applicable));
- Credit reporting bodies – credit reporting bodies may collect the information we provide to them (including default information) and use it to provide their credit reporting services (see section 5 below);
- Entities established to help identify illegal activities and prevent fraud
- Overseas entities that provide products and services to us; and
- Any other parties that you authorise or that we are required or permitted by law to share information with.

Sending Information Overseas:

Generally, we use customer service teams located within Australia. However, we may send your information overseas, including to overseas associated Argenic entities and to service providers or other third parties who operate or hold data outside Australia. Where we do this, we take reasonable steps to ensure that appropriate data handling and security arrangements are in place. Please note that Australian law may not apply to some of these entities and the relevant entity may not be required to protect the information in a way that, overall, provides comparable safeguards to those in the Australian Privacy Act.

We may also send information overseas to complete a particular transaction or where this is required by laws and regulations of Australia or another country.

Where we send your information overseas, it is likely to be one of the following countries:

- Canada;
- Hong Kong;
- India;
- Philippines;
- South Africa;
- United Kingdom; and/or
- United States

Data Security

We employ industry-standard security measures to protect your personal information from unauthorised access, disclosure, alteration, or destruction. However, no method of transmission over the internet or electronic storage is 100% secure, and we cannot guarantee absolute security.

It is important to keep your account login credentials secure and not to share them with others. If you suspect any unauthorised access to your account, please notify us immediately.

Any payment transactions carried out by us or our payment-processing providers will be encrypted using Secured Sockets Layer technology or a secure virtual private network. However, we do not have control over information while in transit over the internet and we cannot guarantee its security. Where information is no longer required to be held or retained by us for any purpose or legal obligation, we will take all reasonable steps to destroy or de-identify the information accordingly.

Cookies

We also use cookies to improve your user experience when using our website and to learn how you interact with our content.

We may use your personal information to manage our website and the Argenic Payment System, (including troubleshooting, data analysis, testing, research, statistical and survey purposes), and to make sure that content from our website is presented in the most effective way for you and your device.

Children's Privacy

The Service is not intended for use by individuals under the age of 18. We do not knowingly collect personal information from children. If you believe that we may have inadvertently collected personal information from a child, please contact us, and we will promptly delete the information.

Your Rights and Choices

You have the right to be told about how we use your personal information.

We provide this privacy notice to explain how we use your personal information.

You can ask to see the personal information we hold about you and you have a general right right to access, update, or correct your personal information when you request it, except where we have the right to refuse your request under APP 12

To request access to your information please contact us by email at support@argenic.com and provide:

- your name and contact details;
- the personal information you want to access; and
- how you'd like to access the information (such as receiving a copy by email or post).

We will respond to any request for access to personal information within 30 days.

Data Retention: We retain your personal information for as long as necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Opt-Out: You may choose to opt-out of receiving promotional communications from us by following the unsubscribe instructions provided in the messages or by contacting us directly.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable laws. We will notify you of any material changes by posting the updated Privacy Policy on our website or through other reasonable means. Your continued use of the Service after the effective date of the revised Privacy Policy constitutes your acceptance of the changes.

How long will you hold my Personal Information?

In Australia, pursuant to regulatory requirements for record keeping, we will generally retain personal information for a period of up to seven years after ceasing to provide any designated services to you, unless there is a reasonable legal or business need for us to hold the data for a longer period.

Complaints

If you have a complaint about the management of your information, in breach of the Privacy Act, APPs or a Code, you can reach out to us anytime by email, support@argenic.com.

Please ensure to include the following details:

- your full name;
- your phone number;
- your email address;
- the date when the issue happened, details of the issue, including the date of the transaction;
- details of your proposed resolution for your complaint.

After submitting your complaint, we'll let you know that we received your email and also give you a timeframe when we expect a response by. Then we'll send you a copy of your complaint so you can keep it for your own records. We may contact you to gather more information relating to your complaint. A dedicated member of our complaints team will investigate the matter for you.

If we have everything we need, we will do our best to provide you with the final response within 30 days and will clearly mention whether our response is final or not.

We will aim to respond to your complaint as soon as possible. If you are unhappy with how we have dealt with your complaint, or it has not been resolved within 30 days following receipt of the complaint, you may refer your complaint to the Australian Complaints Authority (AFCA). AFCA provides a fair and independent dispute resolution service which is free to customers.

AFCA's contact details are:

Australian Financial Complaints Authority:

GPO Box 3 Melbourne VIC 3001

Phone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

Contact Us

If you have any questions or concerns about this Privacy Policy, our privacy practices, please contact us at:

- By email at support@argenic.com or
- By letter to Level 13, 300 Ann Street, Brisbane, QLD 4000, Australia or
- By phone: 1300 778 887

Additional Information

For additional information about privacy in Australia, you may contact the Office of the Australian Information Commissioner (OAIC):

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Website: www.oaic.gov.au

By using Argenic's Service, you acknowledge that you have read, understood, and agreed to be bound by this Privacy Policy.