

About this Privacy Policy

You have come through to this page from a particular page on domain.com.au or allhomes.com.au (each referred to as "the Website" in this Privacy Policy). The Website is owned and operated by Fairfax Media Limited and/or its related bodies corporate, including Golden Mail Pty Limited ABN 15 008 663 161.

Golden Mail Pty Limited ABN 15 008 663 161 is one of the entities that operates the Website and is a credit representative of eChoice Home Loans Pty Limited (Australian Credit Licence number 390502), credit representative number 478746.

In this policy, "us", "we" or "our" means Golden Mail Pty Limited (ABN 15 008 663 161) and its related bodies corporate.

The privacy of your personal information has always been important to us. We are committed to protecting your privacy. This policy explains how your personal information will be treated as you access and interact with "Get the Real Picture" on the Website.

In respect of your access of, or interaction with, any other pages of domain.com.au or allhomes.com.au and any other interaction you have with Fairfax Media Limited and its related bodies corporate, please refer to the Fairfax Privacy Policy at <http://www.fairfax.com.au/privacy.html>.

What this Privacy Policy covers

This Privacy Policy outlines how we manage your personal information. It also describes generally the sorts of personal information held and for what purposes, and how that information is collected, held, used and disclosed.

This Privacy Policy applies to all your dealings with us in respect of "Get the Real Picture" on the Website – both online and on the phone.

Open and transparent management of personal information

We will manage personal information, including credit information, in an open and transparent manner. In doing so, we ensure that individuals are notified at the time of collecting their personal information:

- what type of personal information is being collected;
- who that personal information will be disclosed to; and
- how we use that personal information.

We encourage you to check the Website regularly for any updates to this Privacy Policy and we will provide you with a copy of this Privacy Policy free of charge on request and in a suitable format.

What is personal information

When used in this policy, the term "personal information" has the meaning given to it in the Privacy Act 1988 (Cth). In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and financial information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information we collect, hold, use and disclose

We may collect the following types of personal information:

- name;
- mailing or street address;

- email address;
- telephone number;
- age or birth date;
- profession, occupation, job title, income;
- financial information, such as details of your assets and liabilities;
- details of your intended property purchase;
- details of any property currently owned;
- any additional information necessary to deliver the products and services to you and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through the Website or indirectly through use of the Website or online presence through our representatives or otherwise;
- information you provide to us or our representative over the phone, customer surveys or visits by our representatives from time to time.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

Anonymity and pseudonymity

Generally we are not able to deal with you if you do not wish to identify yourself or provide the personal information described in this policy. However, where possible and appropriate we will provide information of a general nature to unidentified individuals.

Collection of personal information

The Website has been designed so that you identify yourself only when you're ready to learn more about the services offered, you wish to hear from us, or you wish to receive information or communication from a financial services consultant, other partners, lenders, brokers or related companies.

We collect your personal information directly from you unless it is unreasonable or impractical to do so. We do this in ways including:

- through your access and use of the Website and related apps,
- when you complete "Get the Real Picture" on the Website;
- during conversations between you and our representatives.

We may also collect personal information from third parties including

- third party companies such as credit reporting agencies, law enforcement agencies and other government entities;
- advertisers;
- mailing lists;
- recruitment agencies;
- contractors and business partners.

We collect, hold, use and disclose personal information for the following purposes:

- arranging, providing or assessing an application for credit by a lender or broker;
- providing individuals with the products or services they have requested and to send information requested by the individual;

- to answer enquiries and provide information or advice about existing and new products or services;
- managing our relationship with individuals;
- to communicate with individuals including by email, mail or telephone;
- to provide as part of business data to third parties if you have authorised us to do so;
- to conduct business processing functions for operation of our websites or our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- to provide individuals' updated personal information to us, our contractors or external service providers;
- to investigate any complaints about or made by an individual, or if we have reason to suspect that an individual is in breach of any of our terms and conditions or that an individual is or has been otherwise engaged in any unlawful activity;
- protecting individuals and ourselves from error or fraud; or
- complying with regulatory requirements or as requested or permitted by law.

If during our relationship with you we wish to use your personal information for an additional purpose, we will obtain your consent unless the purpose is related to the purpose listed above or we are permitted under law to do so.

We may also collect sensitive information when it has been provided as part of a loan application. Any sensitive information that is collected in this way is only used for the purpose for which it is provided, and is collected with the individual's consent. Where possible, we collect personal information directly from the individual.

Our partners, lenders and brokers include but are not limited to,

- eChoice Limited (ACN 002 612 991) and its subsidiary group of companies, Level 5, 55 Mountain Street, Ultimo NSW 2007, please visit their website to access their privacy policy
- Finconnect (Australia) Pty Ltd (ACN 122 896 477), Level 3E, 11 Harbour St Sydney NSW 2000.

Please be aware that our partners, lenders and brokers may have their own privacy policies which may apply once you enter into a relationship with them.

Unsolicited personal information

If we receive unsolicited personal information we will determine whether we could have collected that personal information by lawful and fair means, and whether it is related to one of the purposes of collecting personal information above. We will do this by looking at our relationship with the individual and whether the personal information relates to our relationship with them.

If we could not have collected the personal information by lawful and fair means, or the personal information does not relate to one of our purposes for collecting the personal information, we will destroy the personal information.

Sensitive information

Sensitive information is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

We will not ask you to disclose sensitive information, but if you elect to provide sensitive information it will also be captured and stored.

How do we disclose your personal information

We may disclose your personal information to:

- to any organisation involved with providing credit to you including, but not limited to, eChoice Limited and Finconnect (Australia) Pty Ltd whose details are set out above;
- our employees, related bodies corporate, contractors, associates or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, printing and mailing houses, newsagents, couriers, payment processors, photographic analysers, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;
- our existing or potential agents, business partners or joint venture entities or partners;
- specific third parties authorised by you to receive information held by us;
- any industry body, tribunal court or otherwise in connection with any complaint regarding the approval or management of your loan – for example if a complaint is lodged about us, the lender or any other party involved in providing credit to you;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Privacy Act).

Direct marketing materials

We may use or disclose your personal information to provide you with current information about products and services that we consider may be of interest to you. You can contact us at any time if you no longer want us to do this, see our 'Contact us' details below.

In all our direct marketing communications we will provide a prominent statement about how an individual can elect not to receive direct marketing. If the direct marketing communication is an email we will provide an 'unsubscribe' function within the email.

We will keep appropriate records to ensure those individuals that have made requests not to receive direct marketing communications do not receive them. We do not apply a fee to unsubscribe from direct marketing communications.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

Cross-border disclosure of personal information

We may disclose personal information to our related bodies corporate, external service providers, partners, lenders and brokers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- our related bodies corporate, located in New Zealand and South East Asia;
- our data hosting and Cloud-based IT service providers;
- other external service providers located in the Philippines and U.S.; and
- other third parties operating in jurisdictions including China, India, Indonesia, New Zealand, Hong Kong and the United States where you have authorised us to do so.

If you leave the Website and visit the websites of third party providers of goods and services (including the websites of partners, lenders and brokers) (**Third Party websites**) those parties may permit personal information to be sent offshore. Please check the privacy policies of those Third Party websites to ensure you are aware of and understand if this is the case.

Adoption, use or disclosure of government related identifiers

We do not use government related identifiers to identify individuals. We may receive tax file numbers in the course of providing services; however, we do not use or disclose tax file numbers for any purpose.

Quality of personal information

We rely on individuals to help us to ensure that their personal information is accurate, up-to-date and complete. You may change your applicant details online while you are on the Website, or in conversation with a financial services consultant. We are as keen as you are to ensure that our information about you is accurate.

If we become aware that personal information is inaccurate, out-of-date or incomplete, such as when mail is returned, we will update our systems accordingly.

Security of personal information

The security of your information is very important to us. We store information in different ways, including in paper and electronic form.

We regularly review developments in security and encryption technologies. Unfortunately, no data transmission over the internet can be guaranteed as totally secure.

We take all reasonable steps to protect the information in our systems from misuse, interference, loss, and any unauthorised access, modification or disclosure.

If we no longer require your information, and we are legally permitted to, we will take all reasonable steps to destroy or de-identify the information.

We take reasonable steps to preserve the security of cookie and personal information in accordance with this policy. If your browser is suitably configured, it will advise you whether the information you are sending us will be secure (encrypted) or not secure (unencrypted).

We take reasonable steps to protect your personal information, these include:

- confidentiality requirements for our employees;
- document storage security policies;
- security measures for systems access;
- providing a discreet environment for confidential discussions;
- only allowing access to personal information where the individual seeking access has satisfied our identification requirements;
- access control for our buildings; and
- electronic security systems in place for our website, including the use of encrypted passwords and data, firewalls and expert monitoring.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

Access to personal information

Individuals may request access to any personal information that we hold about them. We will not charge an individual for requesting access to their personal information.

We will verify the individual's identity prior to disclosing any personal information.

Providing we contact you, your call may be monitored or recorded for coaching and training purposes.

We will not give access to the personal information that we hold about an individual where it is unreasonable or impracticable to provide access, or in circumstances where the request would likely:

- pose a serious threat to the life, health or safety of any individual, or to public health or public safety;

- interfere with the privacy of other individuals or result in a breach of confidentiality;
- be frivolous or vexatious;
- relate to anticipated legal proceedings, and the correct method of access to personal information is by the process of discovery in those legal proceedings;
- reveal the intentions of the entity in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- be unlawful or in breach of an Australian law;
- prejudice the taking of appropriate action in relation to a matter where unlawful activity or misconduct that relates to our functions or activities;
- prejudice an enforcement related activities of an enforcement body (such as ASIC); or
- reveal commercially sensitive information.

When we receive a request for access we will usually respond to the individual within 7 days. However, depending on the nature of the request we may provide the personal information when the request is made.

If the individual is requesting a large amount of personal information or the request cannot be dealt with immediately, then after we have investigated the request for access we will advise the individual what personal information we hold and provide details of that personal information.

We will comply with all reasonable requests by an individual to provide details of the personal information that we hold in the requested format.

If we do not provide access to the information we will provide written reasons setting out why we do not believe we need to provide access. We will also advise the individual of avenues they can pursue if they are dissatisfied with a decision not to provide access to personal information.

Correction of personal information

If we hold personal information about an individual and we are reasonably satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading, or we receive a request to correct the information, we will take reasonable steps to correct the information.

If we correct personal information that we have previously disclosed, we will take reasonable steps to notify the entity to which we disclosed the information of the correction. We may not always make corrections to an individual's personal information. When we do not make requested corrections, we will provide reasons for our refusal to make the correction and provide details of the avenues they can pursue if they are dissatisfied.

If, after notifying the individual of our refusal to correct personal information, the individual requests us to issue a statement on the record that contains the personal information; we will take reasonable steps to do so.

Information from third parties

The Website may contain links to Third Party websites. If you have accessed Third Party websites through our website and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties.

Where you access a Third Party website from our website, cookie information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

We make no representations or warranties in relation to the privacy practices of any Third Party websites and we are not responsible for the privacy policies or the content of any Third Party websites. Third Party websites are responsible for informing you about their own privacy practices.

Cookies

We use 'cookies' to provide you with better and more customised service and with a more effective website.

A 'cookie' is a small text file placed on your computer by our web page server. A cookie can later be retrieved by our webpage servers. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser.

We use cookies in two main ways:

- To allow the matching process to be completed. The cookies used here are 'transient cookies', sometimes called "session cookies". These cookies are not stored on your computer's hard disk, cannot be linked to applicant details or subscriber details, and are discarded when you finish the matching process, or if you have left the loan-matching process alone for more than 30 minutes. We cannot use any information from these cookies to find out anything about you. Without them, we cannot complete the loan-matching process.
- To record usage details – primarily, how many times a visitor has been to our site before. The cookies used here are 'persistent cookies' that remain on your hard disk after you visit the Website. They contain no information that could be read by any other user of your computer. These persistent cookies ensure that no user receives an exit survey twice, and help us make the Website easier to use for both new users and those who are familiar with the Website. However, if you disable persistent cookies in your browser, you can still use the Website.

We also use cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise the Website for you;
- for statistical purposes;
- to identify if you have accessed a Third Party website; and
- for security purposes.

If you leave the Website and visit a Third Party website (including the website of one of our partners, lenders or brokers) the operator of that website may use cookies. Please conduct your own checks to ensure you are aware of and understand cookies used by these third parties.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

IP addresses

Your IP address is the identifier for your computer when you are using the internet. It may be necessary for us to collect your IP address for your interaction with various parts of our website. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

Online applications

When you send a completed online application to us, we retain the information contained in that application. We are able to then use that information to provide any financial services that you require. Online applications that have been suspended or saved may be viewed by us.

How you can complain about a breach of privacy

If you believe your privacy has been breached by us under this Privacy Policy, have any questions or concerns about this Privacy Policy please, contact us using the contact information below and provide

details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with privacy breaches. Once the Privacy Officer receives a complaint, whether it is in writing or verbal means, the Privacy Officer will commence an investigation. The investigator will endeavour to determine the nature of the breach and how it occurred. We may contact you during the process to seek any further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer
Fairfax Media Limited
Post: GPO Box 506
Sydney NSW 2001
Tel: 02 9282 2040
Email: privacy@fairfaxmedia.com.au

Golden Mail Pty Ltd is a member of the Credit & Investments Ombudsman (CIO), previously known as Credit Ombudsman Services Limited. If you have been unable to resolve your complaint to your satisfaction in respect of a privacy matter to which this Privacy Policy relates, you can refer your complaint to CIO by visiting their website www.cio.org.au or phoning 1800 138 422.

Contact us

For more information about this Privacy Policy, please call: 02 9282 2040 or email privacy@fairfaxmedia.com.au.