



Privacy Policy

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1 Background

CRL Financial Services (**we, our, us**) respects your rights to privacy under the *Privacy Act 1988 (Cth)* (**Act**) and we seek to apply the *Australian Privacy Principles* where we are able. We comply with the Act's requirements in respect of the collection, management and disclosure of your personal information. This document describes how we comply.

For the purpose of this policy '**you**' includes our customer, supplier or service provider and any person who holds office in an entity that is a customer, supplier or service provider.

2 What is your personal information?

In this privacy policy, the term '**personal information**' has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address, profession or occupation, date of birth, insurance details and tax file number. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

3 What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- facsimile number;
- website details;
- age or birth date;
- profession, occupation or job title;
- driver's license;
- personal insurance details;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- details of any additional information relating to you that you provide to us directly through our forms, indirectly through use of our websites or online presence, or through our representatives or otherwise;
- information you provide to us through our service team, customer surveys or visits by our representatives from time to time; and
- bank account information.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

We will not collect personal information unless the information is reasonably necessary for one or more of our functions or activities.

If we receive personal information about you which we did not solicit, we will, within a reasonable period after receiving such information, determine whether or not we could have collected the information in adherence with this Privacy Policy. If we determine that we could not have collected such information in adherence with this Privacy Policy, we will, as soon as practicable (but only if it is reasonable and lawful to do so) destroy the information or ensure that the information is de-identified.

4 How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our website;

- during conversations between you and our representatives;
- when you complete our forms or agreements;
- when you purchase products or services from us; or
- when you complete a form requesting articles / updates from us.

We may also collect personal information from third parties such as credit reporting agencies, law enforcement agencies and other government entities.

If we collect details about you from someone else or if you may not be aware that we have collected the personal information, we will, at or before the time the information is collected, or if that is not practicable, as soon as practicable after, take such steps as are reasonable in the circumstances to notify you of:

- the fact that we have collected the subject information; and
- the circumstances of that collection.

5 Cookies

In some cases we may also collect your personal information through the use of cookies (these being small summary files containing a unique 10 digit number). When you access our website, we may send a cookie to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer our websites, track users movements, and gather broad demographic information.

6 What happens if we can't collect your personal information?

If you do not provide us with the personal information described above (including by use of computer settings which do not permit acceptance of cookies), some or all of the following may happen:

- we may not be able to provide to you products or services that you have requested, either to our usual standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or
- we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

7 Storing and securing personal information

We store personal information in a combination of computer and paper-based files. We will take reasonable technical and organisational precautions to protect your personal information from:

- loss, misuse and interference; and
- unauthorised access, modification or disclosure.

We will store the personal information from you that we hold in an electronic form on secure servers.

We will take such steps as are reasonable in the circumstances to ensure that any personal information that is no longer needed for the purpose for which it was collected is destroyed or permanently de-identified.

8 For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of customer service.

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

- to identify you;
- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to assess the performance of our websites and our apps, and to improve the operation of our websites and our apps;
- to conduct business processing functions including providing personal information to us, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of CRL Financial Services;
- to collect payments from you;
- to provide your updated personal information to our related bodies corporate;
- to update our records and keep your contact details up to date;
- to process and respond to any concerns or complaints you raise; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

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

If we collect personal information for a particular purpose, we will not use the information for a secondary purpose unless:

- we have obtained your consent;
- you would reasonably expect us to use the information for the secondary purpose and the secondary purpose is related to the primary purpose;
- the use or disclosure of the information is required or authorised by law under an Australian law or a court/tribunal order;
- a permitted general situation exists in relation to the use or disclosure of the information; or
- we reasonably believe that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body (in which case we will make a note of such use or disclosure).

9 To whom may we disclose your information?

We may disclose your personal information to:

- our employees, contractors or service providers for the purposes of operation of our websites or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, registry providers, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors, consultants and investigators;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- law enforcement agencies; and
- any organisation for any authorised purpose with your express consent.

10 Direct marketing materials

We may use or disclose your personal information to send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from

our mailing list.

We do not provide your personal information to other organisations for the purposes of their direct marketing to you.

11 How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). If we hold information that you are entitled to access and an exception under the Act does not apply, we will [try to] provide you with suitable means of accessing it (for example, by mailing or emailing it to you) within a reasonable time after your request. We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for the making of the request and we will not charge for our making any corrections to your personal information. We will require you to identify yourself to us before we provide you with a copy of the personal information we hold.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal and explain the mechanics available to complain about that refusal.

If you believe that personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading then you may ask us to amend it. Upon any such request, we will consider whether the information requires amendment. If we do not agree that there are grounds for amendment, then at your request we will add a note to the personal information stating that you disagree with it. We will give you written reasons for our refusal and explain the mechanics to complain about that refusal.

12 What is the process for complaining about a breach of privacy?

If you have a concern about how we collect, store, use and disclose your personal information, please contact us and provide as much detail as possible about your concern so that we can fully investigate it.

Our procedure for dealing with such notified concerns is:

- your usual CRL Financial Services' contact will discuss your concerns with you;
- if your concerns are not resolved to your satisfaction, our Privacy Officer will further discuss your concerns with you; and
- if your concerns still remain unresolved, you should contact the Office of the Australian Information Commissioner on 1300 363 992 or by email to enquiries@oaic.gov.au.

You may communicate with us anonymously or using a pseudonym except when we are required by law or an order to identify you. We will not seek to match your pseudonym to other information we have collected from you but we may need you to identify yourself to us at some stage to properly assist you.

13 Do we disclose your personal information to anyone outside Australia?

We run our business in Australia. We may need to share some of your information with organisations outside Australia. Sometimes, we may need to ask you before this happens.

We may store your information in cloud or other types of networked or electronic systems. As electronic or networked systems can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

We take steps as are reasonable in the circumstances to ensure that the overseas recipients of your personal information do not breach the Australian Privacy Principles in relation to your personal information.

14 Links

Our websites may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

15 Contacting us

If you have any questions about this privacy policy, or any concerns or complaints regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below. We will treat your requests or complaints confidentially. You will be contacted 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: carl@crl.financial

More information about Australia's privacy laws and the Australian Privacy Principles is available from the Office of the Australian Information Commissioner at www.oaic.gov.au. You can contact that office if we cannot resolve any privacy issue that you raise with us.

16 Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated on 3rd May 2019.