



E contact@puream.com.au

Level 7, 2 Bligh Street
Sydney NSW 2000

PRIVACY POLICY

'We', 'us' and 'our' refers to PURE Asset Management Pty Ltd (ABN 46 616 178), Australian Financial Services Licence 520 396.

Similarly, any reference to 'you', 'your', 'yours' or 'yourself' is a reference to any of our customers, potential customers, shareholders and others, as the context requires.

1. We respect your privacy

- 1.1 PURE Asset Management Pty Ltd respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. We adhere to the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth). This policy sets out how we collect and treat your personal information.
- 1.2 "Personal information" is information we hold which is identifiable as being about you.
- 1.3 "Credit information" is information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.
- 1.4 Any references in this Policy to 'personal information' should be read as including credit information.

2. Collection of personal information

- 2.1 We collect personal information for the purposes of assessing your application to become a member in our Fund and/or your application for finance and managing that finance. If you are applying for financial products, we collect your personal information to assess your application and manage and administer those financial products. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.
- 2.2 We collect personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we provide our services to you.



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- 2.3 You may provide information including, but not limited to, your name, phone number, address, email address, date of birth, gender, income, assets and liabilities, account balances, trading statements, financial statements, credit reporting information, tax file numbers, employment details and location data to enable us to send information, provide updates and process your product or service order. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.
- 2.4 We may receive personal information from third parties, such as credit reporting bodies, finance brokers and other people such as lawyers and accountants. If we do, we will protect it as set out in this Policy.
- 2.5 We may verify your identity using information held by a Credit Reporting Body (CRB). To do this we may disclose personal information such as your name, date of birth, and address to the CRB to obtain an assessment of whether that personal information matches information held by the CRB. The CRB may give us a report on that assessment and to do so may use personal information about you and other individuals in their files. Alternative means of verifying your identity are available on request. If we are unable to verify your identity using information held by a CRB we will provide you with a notice to this effect and give you the opportunity to contact the CRB to update your information held by them.
- 2.6 If you are applying for finance, we may also collect the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses.

Additionally, we may also collect any other information you provide while interacting with us.

3. Use of your personal information

- 3.1 We may use personal information collected from you to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.
- 3.2 To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organisations that provide products or services used or marketed by us. The types of organisations to which we are likely to disclose information about you include mortgage intermediaries, lenders, valuers, lenders mortgage insurers, surveyors, accountants, credit reporting bodies, recoveries firms, debt collectors, product issuers, investment managers and lawyers. We may also disclose your personal information to any other organisation that may have or is considering having an interest in your finance, or in our business.



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- 3.3 From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.
- 3.4 If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 0421 837 539 or by writing to us at either contact@puream.com.au or Level 7 / 2 Bligh Street, Sydney, New South Wales, 2000.
- 3.5 If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.
- 3.6 We may contact you by a variety of measures including, but not limited to telephone, email, sms or mail.

4. Disclosure of your personal information

- 4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, subcontractors or a Credit Reporting Body insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.
- 4.2 We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- 4.3 We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of Pure Asset Management Pty Ltd, www.puream.com.au, its customers or third parties.
- 4.4 Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia.
- 4.5 If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.
- 4.6 By providing us with personal information, you consent to the terms of this Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.



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5. Security of your personal information

- 5.1 We are committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- 5.2 The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Policy.

6. Notifiable matters

- 6.1 The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information.
- 6.2 We exchange your credit information with credit reporting bodies. We use the credit information that we exchange with the credit reporting body to assess your creditworthiness, assess your application for finance and managing your finance.
- 6.3 If you fail to meet your payment obligations in relation to any finance that we have provided or arranged or you have committed a serious credit infringement, then we may disclose this information to a credit reporting body.
- 6.4 You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. Please see the heading access and correction to your personal and credit information, below.
- 6.5 Sometimes your credit information will be used by credit reporting bodies for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your credit information is not used in this way.
- 6.6 You may contact the credit reporting body to advise them that you believe that you may have been a victim of fraud. For a period of 21 days after the credit reporting body receives your notification the credit reporting body must not use or disclose that credit information.



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7. Access and correction to your personal information

- 7.1 It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.
- 7.2 If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.
- 7.3 You may request details of personal information that we hold about you in accordance with the provisions of the *Privacy Act 1988* (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information, which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at contact@puream.com.au
- 7.4 We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the *Privacy Act 1988* (Cth).

8. Complaints about privacy

- 8.1 If you have any complaints about our privacy practices, please feel free to send in details of your complaints to us at contact@puream.com.au or Level 7 / 2 Bligh Street, Sydney, New South Wales, 2000. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.
- 8.2 If you are dissatisfied with our response, you may make a complaint to the Privacy Commissioner at www.oaic.gov.au or by phone on 1300 363 992.

9. Changes to Privacy Policy

- 9.1 Please be aware that we may change this Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Policy.



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10. Website

10.1 *When you visit our website*

When you come to our website (www.puream.com.au) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

10.2 *Cookies*

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

10.3 *Third party sites*

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that Pure Asset Management Pty Ltd is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

Approved By:

Signature: _____

Full Name: Tim Callan Date: 5 November 2020