

## Privacy Policy

### Introduction

Flint understands how important it is to protect your personal information. This privacy policy governs the collection and use of your personal information by Canopy Private Pty Ltd (ACN 168 628 073), their related entities, subsidiaries, employees, contractors, and the brokers that will assist you (“we”, “us” or “the group”). We note that Australian Finance Group Ltd (ACN 066 385 822 ) is the holder of the Australian Credit Licence 389087.

This privacy policy explains how we intend to respect your rights to privacy in accordance with the National Privacy Principles contained in the Privacy Act 1988 (Cth). Under the Privacy Act, we are required to make you aware of certain matters. This Policy incorporates our Privacy Collection Statement, as it addresses all these matters (as well as others):

- Our identity and contact details.
- The facts and circumstances, and the purposes, of collection of personal information.
- The consequences for you if personal information is not collected.
- Other entities, bodies, or persons to which personal information is usually disclosed.
- Information about access and correction of, and how you may complain about the way we handle your personal information.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this privacy policy and any other arrangements that apply between us. We may change our privacy policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current privacy policy.

### Your personal & sensitive information

When we refer to personal information, we mean information or an opinion from which your identity is apparent or can reasonably be ascertained. Personal information held by us includes (without limitation) information such as your name, age or date of birth, current and previous addresses, telephone or mobile phone number, email address, bank details, professional job title or occupation, driver’s licence number, passport details, and financial details.

Personal information may also include details of products and services you have acquired via us or have enquired about (including their status) together with any additional information necessary to deliver those products and services and to respond to your enquiries.

The personal information may also include credit information. Credit information is a sub-set of personal information and is information which is used to assess your eligibility to be provided with finance. It may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies (CRBs). Personal information derived by a CRB from credit information held by the CRB that has any bearing on an individual’s credit worthiness and is or has

been or could be used to establish the individual's eligibility for credit is known as "CRB Derived Information".

You may also need to provide personal information about other individuals to us for example, personal information about joint applicants, co-applicants or guarantors, your authorised representatives, or your accountant or solicitor's contact details. If so, we rely on you to inform those individuals that you are providing their personal information to us, to ensure they agree to their information being provided to us, to advise them of this Policy and that we can be contacted for further information.

#### How we collect personal information

We may collect personal information in various ways, including:

- Directly from you, for example, when you provide information by phone, in application forms, or other agreements, or when you submit your personal details through our website, or any other interaction with us in any way.
- from your joint applicants, co-applicants, or guarantors.
- when you visit our websites.
- from your representatives, e.g., solicitors, conveyancers, builders, agents.
- from referral partners, who refer your business to us.
- from third party sources, such as suppliers, social media or other third-party integrations.

If we have obtained your personal information through any of these methods and you would like a list of these entities or websites or you could like to be removed from our call or email lists please contact us at [hello@flintgroup.au](mailto:hello@flintgroup.au)

We collect personal information about you to enable us to assess your suitability and eligibility for obtaining a mortgage or for the provision of other services.

If you give us personal information about another person, you represent that you are authorised to do so and agree that you have obtained consent from that person for us to use and disclose their personal information and that they may access any personal information we hold about them.

Information we automatically collect: We also automatically collect certain technical data that is sent to us from the computer, mobile device and/or browser through which you access our website (Automatic Data). Automatic Data, includes without limitation, a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address) characteristics about your access device and/or browser, statistics on your activities on the website, details of any services we have provided to you or that you have enquired about, or information about how you came to the website. We collect Automatic Data based on your consent which was granted to us by you when you accepted this privacy policy.

#### How we use your personal information

We use your personal information to assist us in:

- Conducting our business or providing any services. For example, in determining whether you may qualify for a loan.
- Completing a transaction to which the provision of that personal information relates, for example, in the completion of loan application forms.
- To communicate information about our products and services to you.
- For our internal administrative, marketing, planning, product development and research requirements; and
- To update a third-party referrer of your loan on the success or outcome of your loan for commission purposes.

At any time, you may opt out of receiving any communications from us (other than as required for the operation of our business). If you wish to opt out of receiving communications from us, please either contact your broker or our inbox – [hello@flintgroup.au](mailto:hello@flintgroup.au)

To whom do we disclose your personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- (a) our employees;
- (b) our related bodies corporate;
- (c) our brokers, our approved panel of lenders, service providers and agents that we use in the ordinary operation of our business;
- (d) third-party suppliers and service providers (including providers for the operation of our website and/or our business or in connection with providing our services to you);
- (e) professional advisers, dealers and agents;
- (f) payment systems operators (eg merchants receiving card payments);
- (g) our existing or potential agents, business partners or partners;
- (h) our sponsors or promoters of any competition that we conduct via our services;
- (i) anyone to whom our assets or businesses (or any part of them) are transferred;
- (j) specific third-parties authorised by you to receive information held by us; and/or
- (k) other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We are a contractor network and your personal information may be disclosed between Flint and its brokers within the group to facilitate a transaction to which the provision of that personal information relates or to enable us to properly conduct our business within the group.

## Disclosure of your personal information to others

We will only use and disclose your personal information for the purposes that we collected the personal information, including without limitation:

- Whether you may qualify for a loan;
- To assist you to locate a suitable loan;
- For internal or administrative purposes, such as data processing, printing or mailing;
- To update a referrer of your loan with the general progress of your loan (excluding any sensitive information);
- For other financial services that we offer that you may require;
- To enable you to access and use our website and purchase our products or services;
- to operate, protect, improve and optimise our business, website and our customers' experience, such as to perform analytics and conduct research;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and/or
- to comply with our legal obligations, resolve any disputes that we may have with any of our Users, and enforce our agreements with third parties.

For example, if you provide us with personal information to find a suitable loan, we may collect personal information about you and disclose it to our approved panel of lenders or our brokers.

If your personal information is disclosed to third parties, these third parties are strictly prohibited from using your personal information for any other purpose. We will only disclose to these third parties that information necessary for them to perform their services. Otherwise, we do not disclose personal information unless we are required to do so by law or regulation.

## Your access rights to the personal information we hold

At any time, you may ask us to provide you with a list of the personal information we hold about you, and copies of that personal information. We will endeavour to provide you with the data within 30 days of receiving your request. We may charge you a small fee to cover any administrative costs that we may incur in providing personal information to you. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell

you why. We may also need to verify your identity when you request your personal information. We will consider and respond to all requests in accordance with all applicable laws.

If you believe for any reason that we are holding inaccurate or incomplete data about you, you may ask us to correct it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Financial information becomes out of date very quickly and so we will update that information if it is required in any future dealings we may have with you. We will take reasonable steps to destroy or remove identifying information of your personal information, when your personal information is no longer required for our business functions.

#### Transfer of information overseas

To complete our services to you, we may transfer personal information we have collected about you to someone in a foreign country, but only if permitted to do so under the Australian Privacy Principles of the Privacy Act 1998 (Cth).

Some external organisations and entities may be located outside of Australia. You should note that while they will often be subject to confidentiality or privacy obligations, they may not always follow the particular requirements of Australian privacy laws. 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.

Flint has service providers based in the Philippines & Nepal, whose role is to assist in processing applications and assisting with post settlement loan maintenance.

We do not utilise offshore personnel for the purposes of marketing or sales. We will not share any of your credit information with a credit reporting body, unless it has a business operation in Australia.

#### How we store your personal information

Flint takes reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure. Some of the ways we do this are: confidentiality requirements of our employees; document storage security policies; security measures for access to our systems; only giving access to personal information to a person who is verified to be able to receive that information; control of access to our office building, electronic security systems, such as firewalls and data encryption on our webpage.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from anywhere via an internet connection, it is 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 here or those we referred to from time. In addition to the above, we also regularly review developments in security and encryption technologies. However, it is important to remember that the use of email and the internet may not always be secure, even with these safeguards in place.

When we no longer require your information, and we are legally permitted to, we take reasonable steps to destroy or de-identify the information. However, sometimes it is impossible or impractical to completely isolate the information then completely remove all traces of the information, and we

may store the information for future use, such as to help resolve disputes between us or assess future applications by you. The same security safeguards will be in place to protect the information, as detailed in this Policy.

Access to our computer systems is restricted through password protection that require 2 step authentications. If we no longer need your personal information, we destroy or remove the identity information.

#### Cookies

A 'cookie' is a small text file placed on your computer by a webpage server that may later be retrieved by webpage servers. We use cookies or other similar tracking technologies on our website to provide you with a better website experience. When you visit the Flint website or related landing pages to read, browse, submit or download information, our system will record/log your IP address, date and time of your visit to our site, the pages viewed and any information downloaded. You can configure your browser to refuse cookies or delete existing cookies from your hard drive. Rejecting cookies may have the effect of limiting access to or functionality of parts of our website.

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.

#### Advertising and tracking

We may advertise on Third-Party Websites. When you view our advertisements on Third-Party Websites, the advertising company may use cookies, and in some cases, web beacons, to collect information such as the server your computer is logged onto, your browser type, the date and time of your visit and the performance of their marketing efforts. When you access our website after viewing one of our advertisements on a Third-Party Website, the advertising company may collect information on how you utilise our website (e.g. which pages you view).

#### External Dispute Resolution

We have a formal procedure for handling privacy breaches or complaints. You can refer to our Internal Dispute Resolution policy for more information.

If you are dissatisfied with our Internal Dispute Resolution response, you can make a formal complaint to our External Dispute Resolution provider, the Australian Financial Complaints Authority (AFCA). AFCA can consider certain privacy complaints relating to either the provision of credit or Credit Reporting Information in general. You can contact AFCA on:

Tel: 1800 931 678

Email: [info@afca.org.au](mailto:info@afca.org.au)

Web: [www.afca.org.au](http://www.afca.org.au)

Post: Australian Financial Complaints Authority, GPO BOX 3, MELBOURNE VIC 3001

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

Under the Privacy Act, you may make a complaint to the Office of the Australian Information Commissioner (OAIC) about the way we handle your personal information. The OAIC can be contacted at either [www.oaic.gov.au](http://www.oaic.gov.au) or by calling 1300 363 992.

#### Contacting us and feedback

You can make any requests relating to your personal information held by us or any complaints regarding treatment of your privacy by contacting:

Address: 115 Blues Point Road, McMahons Point NSW 2060

Email: [hello@flintgroup.au](mailto:hello@flintgroup.au)

Phone: 0483 913 227