

Privacy Disclosure Statement and Privacy Act Authorisation

CIRCLE Mutual Limited (CIRCLE) ACN 087 650 968 have a strategic alliance with Bendigo and Adelaide Bank Limited (Bendigo Bank) ACN 068 049 178 AFSL/Australian Credit Licence 237879. We act as an agent of Bendigo Bank and Bendigo Bank is the credit provider in relation to the credit products obtained through us. We therefore share all personal information we collect in relation to credit products, and applications for credit products, with Bendigo Bank. The information that follows describes how we and Bendigo Bank collect, use and disclose personal information, and all references in it to 'we', 'us' and 'our' are references to both us and Bendigo Bank unless otherwise stated

1. Collection of your personal information and credit-related personal information

We collect your personal information and credit-related personal information to assess your application, to provide you with the product or service that you have requested and to assess any future applications for products or services you may make to us or our related entities. If you are a guarantor we collect your personal information and credit-related personal information to assess whether to accept you as a guarantor for credit applied for, or provided to, the borrower. Collection of some of this information is required by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. If you provide incomplete or incorrect information we may be unable to provide you with the product or service you are applying for.

2. Collection of personal information and credit-related personal information about third parties

We may need to collect personal information and credit-related personal information about a third party from you as part of this application. If we do this, you agree you will advise that person that we have collected their information, and that in most cases they can access and seek correction of the information we hold about them.

3. Use and disclosure of your personal information and credit-related personal information

We may use your personal information and credit-related personal information to perform our business functions (for example internal audit, operational risk, product development and planning). We may also use your personal information to confirm your details (for example, contacting your employer to confirm your employment and income details). We treat your personal information and credit-related personal information as confidential and only disclose it to others where necessary. For example, we usually disclose your information to organisations to whom we outsource functions such as mailing and printing houses, IT providers, our agents and specialist advisers such as accountants and solicitors. Other disclosures usually include joint account holders, account operators and account applicants, credit reporting bodies (as defined below), insurers, intermediaries, valuers, debt collection agencies and government authorities. Your information may also be disclosed to our related entities or other third parties on whose behalf we provide products and services, where its confidentiality will be maintained at all times.

Other agents of Bendigo Bank using the Alliance Bank® registered trademark could potentially access your personal information and credit-related personal information by reason of their access to Bendigo Bank's online systems. However, they are bound by contractual obligations to Bendigo Bank that prohibit them from accessing such information.

4. Disclosure of personal information and credit-related personal information to overseas organisations

Some of the organisations we disclose your personal information and credit-related personal information to may be located overseas. Where an organisation is located overseas we will either take reasonable steps to ensure that it complies with Australian privacy laws or we will seek your consent to the disclosure.

5. Access to and correction of your personal information and credit-related personal information

In most cases you can gain access to and seek correction of your personal information and credit-related personal information. Should you wish to do so, or if you have any queries about your information, please contact CIRCLE on 1300 553 582.

6. Direct marketing

We may use your personal information and credit-related personal information to inform you about financial products and services that are related to those you have with us or other products and services we think you may be interested in. These may be products and services provided by us, our related entities or other entities we are associated with. If you do not wish to receive any marketing material from us please tick here

7. Collection, use and disclosure of your credit-related personal information

By signing this application you agree that we can do all of the following:

a. Commercial credit-related personal information

Seek and use commercial credit-related personal information to assess an application for consumer credit or commercial credit.

b. Consumer credit-related personal information

Seek and use consumer credit-related personal information to assess an application for consumer credit or commercial credit.

c. Collection of overdue payments

Seek and use a credit report provided by a credit reporting body to collect overdue payments.

d. Exchange of information between credit providers or former credit providers

Seek from and use or give to another credit provider (including a credit provider who has lent money on the same security) any information or opinion about credit worthiness, credit standing, credit history or credit capacity.

e. Exchange of information with intermediaries

Seek from and use any consumer or commercial credit-related information from or disclose that information to, any introducer, financial adviser, accountant, mortgage manager, lawyer, or other intermediary (including any intermediary mentioned on the front page of this application form) acting in connection with any credit applied for or provided.

f. Provide credit information to credit reporting bodies

In this privacy disclosure statement, 'credit reporting body' means each of the following organisations (whether acting individually or together):

Equifax Pty Ltd

PO Box 964

NORTH SYDNEY NSW 2059

Public Enquiries: 1300 762 207

Website: mycreditfile.com.au

Dun & Bradstreet Australia

PO Box 7405 St. Kilda Road

MELBOURNE VIC 3004

Public Enquiries: 1300 734 806

Website: checkyourcredit.com.au

We give credit information to a credit reporting body. Credit information is defined in the Privacy Act and includes, to the extent applicable in any particular circumstances:

- identification information;
- consumer credit liability information;
- repayment history information;
- a statement that an information request has been made in relation to you by us, or a mortgage insurer or trade insurer;
- the type of consumer credit or commercial credit, and the amount of credit, sought in an application:
 - that has been made by you to us; and
 - in connection with which we have made an information request in relation to you;
- default information;
- payment information;
- new arrangement information;
- court proceedings information;
- personal insolvency information;
- publicly available information:
 - that relates to your activities in Australia or the external Territories and your credit worthiness; and
 - that is not court proceedings information about you or information about you that is entered or recorded on the National Personal Insolvency Index;
- our opinion that you have committed, in circumstances specified by us, a serious credit infringement in relation to consumer credit provided by us to you.

The credit reporting body may include the information given by us in reports provided to other credit providers to assist them to assess your credit worthiness. The credit reporting body has a policy for managing your credit information that you may access by contacting them. In some cases a credit reporting body may use your information for pre-screening your eligibility to receive direct marketing from us or other credit providers. If you do not want a credit reporting body to do this contact the credit reporting body.

Where you believe on reasonable grounds that you have been or are likely to be a victim of fraud you may request a credit reporting body not to use or disclose your information.

g. Provide information for securitisation

Disclose any report or information to another person in connection with funding by means of an arrangement involving securitisation.

h. Provide information to guarantors

Disclose any information to any person who proposes to guarantee or has guaranteed repayment of any credit provided.

8. Provide personal information to CUSCAL Ltd (CUSCAL)

We may disclose your personal information to CUSCAL so that CUSCAL can provide electronic payment services to us. Without your personal information, CUSCAL may not be able to provide the services to us. Generally CUSCAL will collect and use your personal information for the following purposes:

- complying with legislative and regulatory requirements such as anti-money laundering laws;
- performing administrative operations, including accounting, risk management, record keeping, archiving, systems development and testing, and staff training;
- managing their rights and obligations in relation to external payment systems;
- conducting market or customer satisfaction research; and
- developing, establishing and administering alliances and other arrangements (including rewards programs) with other organisations in relation to the promotion, administration and use of their respective products and service.

Subject to what is permitted by law, the types of third parties that CUSCAL may disclose your personal information to include:

- their agents, contractors and external advisers whom they engage from time to time to carry out, or advise on, their functions and activities;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- other organisations with whom they have alliances or arrangements (including rewards programs) for the purpose of promoting their respective products and services (and any agents used by them and their business partners in administering such an arrangement or alliance);
- anyone supplying goods or services to you in connection with a rewards program associated with a facility they provide;
- debt collecting agencies;
- other financial institutions;
- external payment systems operators; and
- their insurers or prospective insurers and their underwriters;

In some cases, they may need to transfer your personal information outside Australia. Countries where their suppliers might hold personal information overseas currently include the United States of America, England and Italy.

If at any time you wish to know what personal information CUSCAL holds about you, you may request your details by writing to the Privacy Officer, Cuscal Limited at GPO Box 4720 Sydney NSW 2001

9. Privacy Policy and Credit Reporting Policy

You should also read our Privacy Policies and Credit Reporting Policies. Our Privacy Policies contain information about:

- a. how you can access and seek correction of your personal information;
- b. how you can complain about a breach of the privacy laws by us and how we will deal with a complaint;
- c. if we will disclose personal information to overseas entities, and where practicable, which countries those recipients are located in.

Our Privacy Policies are available on our websites circle.com.au and bendigobank.com.au or by telephoning 1300 553 582.

Bendigo Bank's Credit Reporting Policy contains information about:

- a. how you can access and seek correction of your credit eligibility information;
- b. how you can seek correction of your credit information;
- c. how you can complain about a breach of the credit reporting laws by us and how we will deal with a complaint;
- d. if we disclose your credit information or credit eligibility information to overseas entities, and where practicable, which countries those recipients are located in.

Bendigo Bank's Credit Reporting Policy is available on its website bendigobank.com.au or by telephoning 1300 652 220.