

Credit Guide and privacy consent

About us ("we, us, our"):

Edgecap is licensed under the National Consumer Credit Protection Act 2009.

The details of our licence are as follows:

Business Name	Edgecap Pty Ltd
Address	Tower 4, 727 Collins Street Melbourne Vic 3008
Telephone	0449 163 337
Email	ben@edgecap.com.au
Australian Credit Licence Number	389328

We have authorised (client name) as our credit representative. The details of (client's name) authorisation is:

Credit Representative Name	Benjamin Jowett
Address	Tower 4, 727 Collins Street Melbourne Vic 3008
Telephone	0449 163 337
Email	ben@edgecap.com.au
Credit Representative Number	519049

This Credit Guide contains important information about us, the services we provide and the activities of the credit representative operating under our credit licence. It also contains:

- information about fees and charges that may be payable by you to us
- commissions that we may receive when we are acting as a credit representative
- commissions that we may pay to third parties for introduction of business and information about what you should do if you have a complaint or dispute in connection with our services and activities.

We are required to provide this document to you as soon as practicable after it becomes apparent that we are likely to provide credit assistance to you. We provide 'credit assistance' when we:

1. Suggest or assist you in applying for:
 - a. a particular loan with a particular lender
 - b. an increase to an existing loan with a particular lender, or
2. Recommend that you remain in an existing loan contract.

PRELIMINARY ASSESSMENT

Prior to providing credit assistance to you, we must assess whether the particular loan is 'unsuitable'. A loan will be 'unsuitable' based on the information you provided to us if:

1. You will be unable to repay the proposed loan or will only be able to repay the proposed loan with substantial hardship, or
2. The proposed loan does not meet your requirements and objectives.

We are required to document our findings that the proposed loan is not unsuitable by way of completing a Preliminary Assessment. The Preliminary Assessment will set out your:

- requirements and objectives
- financial and relevant personal situation, and
- ability to repay the proposed loan.

We are also required to take reasonable steps to verify information provided by you to us. This verification may include:

- requesting you for copies of documents that demonstrate your financial situation – in some cases we may also need to sight original documents, and
- contacting third parties to assist in verifying the information that you provide.

Obtaining a copy of the Preliminary Assessment

If we provide you with credit assistance, you may request a copy of our Preliminary Assessment any time for up to 7 years and we must provide you with a copy of the assessment within the following timeframes:

Your request is made:	We will give you your assessment:
Before the Credit Day*	As soon as possible after we receive your request
Up to 2 years after the Credit Day	Within 7 business days after we receive your request
Between 2 to 7 years after the Credit Day	Within 21 business days after we receive your request

* The Credit Day is the date the credit contract is settled or the credit limit is increased. There is no charge for requesting or receiving a copy of the Preliminary Assessment.

FEES AND CHARGES THAT ARE PAYABLE BY YOU IN RELATION TO OUR CREDIT ASSISTANCE

We may charge a fee for providing credit assistance to you. If applicable, details about the fees payable by you will be set out in a Credit Quote which we will give to you prior to submitting your loan application.

Other fees and charges

You may have to pay other fees and charges (such as application fees, valuation costs and other applicable fees) to the lender or other parties. You should review the particular loan contract documentation for further details of any such fees and charges.

HOW WE ARE PAID

Our aggregator receives commission from the lenders, then pays commission to our licensee. Our licensee then pays us commission in relation to loan contracts (such as home and investment property loans) for which we act as the credit representative in providing credit assistance.

An upfront commission is payable by lenders in relation to settled (drawn-down) loans and is calculated as a percentage of the loan amount. It is usually paid after settlement of the loan.

Trail commission is payable by lenders in relation to settled (drawn-down) loans. It is calculated monthly on the outstanding loan balance and is paid in arrears.

The upfront and trail commissions that we are paid by lenders are not payable by you. Details of commission to be received will be included in the Credit Proposal Disclosure document that we will provide to you when credit assistance is provided.

From time to time, we may receive a non-commission benefit by way of training, professional development, entertainment, gift, conference attendance, sponsorship, or entry into a competition run by a lender or our

aggregator at no extra cost to you. The nature of such arrangements is temporary, and the occurrence and amounts are often not readily ascertainable, however if they are apparent as a result of assisting you with credit assistance, this will be disclosed to you.

OUR LENDER PANEL – CREDIT PROVIDERS

We are authorised to engage in credit activities and therefore provide assistance to obtain loans for you from a panel of credit providers. We generally conduct the most business through the following credit providers.

OTHER PEOPLE WE DEAL WITH

Our aggregator

We have approval to utilise credit providers and their loan products through the services of our aggregator 'Connective Broker Services Pty Ltd ABN 77 161 731 111, Credit Representative 437202, authorised under Australian Credit Licence 389328'. The aggregator charges us a fee depending on our contract arrangements, consisting of:

- a share of commission that is paid by the particular credit provider
- a membership fee for our business
- a monthly fee for each of our accredited loan writers

Macquarie Bank Limited has a minority, non-controlling interest in Connective Broker Services Pty Ltd. Commissions paid by Connective's lender panel are transparent and do not influence the broker or consumer choice. Connective is committed to quality consumer outcomes in all circumstances.

REFERRERS AND REFERRAL FEES

We obtain referrals from a range of sources including accountants, financial planners, real estate agents and other people. If you were introduced or referred to us, we may pay the referrer a commission or a fee.

Details of any commission or fees being paid to the referrer will be included in the Credit Proposal Disclosure document we provide to you.

DISPUTE RESOLUTION AND COMPLAINTS

We are committed to providing you with the best possible service, however we understand there may be times where you are not satisfied. If this occurs please inform us verbally or in writing with the exact details of your complaint to allow us to work towards a prompt and fair resolution.

If we are unable to reach a satisfactory resolution, you can make a complaint in writing to the Australian Credit Licence holder. With regards to complaints resolution, we are mindful of the need to ensure that consumers are treated fairly and with respect during the complaints handling process. Any dissatisfaction with a credit representative operating under the licence will be handled in an efficient, timely and effective manner in accordance with ASIC regulations of Internal Dispute Resolution (IDR).

If you are not satisfied with how our licensee has handled your complaint, you may take the matter 'free of charge' to the relevant External Dispute Resolution (EDR) service provider (subject to the provider's terms of reference). Please note that the EDR provider will request the matter be first attempted to be resolved through our IDR process. If our IDR process is still in progress, they would expect that this process be completed before any external consideration.

Our EDR service provider is the Credit and Investments Ombudsman Ltd, which can be contacted via:

- Telephone: 1800 138 422 (Monday to Friday 9 am – 5 pm AEST)
- Fax: 02 9273 8440
- Post: PO Box A252 South Sydney NSW 1235
- Website: <http://www.cio.org.au/>
- Online complaint form: <http://www.cio.org.au/complaint-resolution/making-a-complaint/>

THINGS YOU SHOULD KNOW

We don't provide legal or financial planning advice. It is important you understand your legal obligations under the loan and the financial consequences. If you have any doubts, you should obtain independent legal and financial planning advice before you enter any loan contract.

PRIVACY STATEMENT

We are committed to protecting the privacy of your personal information. Our Privacy Policy governs how we collect, handle, use and disclose your personal information. It also deals with how you can access the personal information we hold about you, request us to correct it or make a privacy related complaint.

This policy explains how we respect your right to privacy in accordance with the Australian Privacy Principles contained in the Privacy Act (Cwlth).

The information we collect and how we use it

We will collect personal information when we conduct business with you. This may include a broad range of information from your name, address and contact details to other information relating to your qualifications, employment history and financial information.

If you choose not to supply any of the information we request, our ability to assist you may be limited.

We will use your personal information to:

- conduct our business
- manage our business relationships with you and with others, including Credit Providers
- complete a transaction on your behalf
- provide you with information about our products and services.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

You can unsubscribe 'opt-out' by notifying us and we will no longer send information to you.

How we hold and protect your information

We strive to maintain the relevance, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you on our secure database. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers who are also regulated by the Privacy Act.

We take all reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or exposure. Access to your information is restricted to those employees whose job requires that information. Access to our premises and computer systems is restricted through locks, password protection, internet firewalls and routers.

We will take reasonable steps to destroy or de-identify your personal information when your personal information is no longer required for our business functions.

We do not disclose the information we collect to anyone

We do not sell, trade or rent client lists or personal information to any third party. We will disclose personal information about you to our credit providers and agents where it relates to our credit assistance.

In all cases we will only disclose the information that is strictly required and take all reasonable steps to ensure that your personal information is handled in accordance with the Australian Privacy Principles. These third parties are

strictly prohibited from using your personal information for any purpose other than in the pursuit of business related to our credit assistance.

Otherwise, we will not disclose personal information unless you consent. We are required to do so by law or only under some unusual other circumstances permitted by the Privacy Act.

How you can access, update or correct the information we are holding

You have the right to access your information. If you believe that we are holding inaccurate, incomplete, irrelevant or out of date data about you, you may request us to correct it. You can make a request for access to or correction of your personal information by contacting us at any time.

In some limited circumstances we may need to refuse access to your information or refuse a request for correction. If this is the case, we will advise you as soon as possible after your request and provide you with our reasons for the refusal.

If you are not happy with how your information is handled

If you have concerns about whether we have complied with the Privacy Act or this Privacy Policy and would like to make a complaint please contact us. Your complaint will be considered through our internal complaints resolution process and we will try to respond with a decision as soon as possible.

Your consent

By asking us to assist, you consent to the collection and use of the information you have provided to us for the purposes described above.

For more information on your privacy rights please visit www.privacy.gov.au

FURTHER INFORMATION

For more information regarding this document or anything else about our services, just contact us at any time. We're here to assist you.

Privacy Policy

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Privacy Policy

Privacy statement and policy

Respecting your privacy

We respect your personal information. This Privacy Policy explains how it is handled. The policy covers Edgecap.

This policy also includes our credit reporting policy, that is it covers additional information on how we manage your personal information collected in connection with a credit application or a credit facility. We refer to this credit related information below as credit information.

The personal information we collect and hold

General information

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers and date of birth
- other contact details such as social media handles
- financial details such as your tax file number and
- other information we think is necessary.

When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws that require us to collect personal information. For example, we require personal information to verify your identity under Australian Anti-Money Laundering law.

What we collect via your website activity

If you're one of our internet customers, we monitor your use of internet services to ensure we can verify you, that you can receive information from us and to identify ways we can improve our services for you.

If you start but don't submit an on-line application, we can contact you using any of the contact details you've supplied to offer help completing it. The information in applications will be temporarily kept and then destroyed if the application is not completed.

We also know that some customers like to engage with us through social media channels. We may collect information about you when you interact with us through these channels. However, for all confidential matters we'll ensure we interact with you via a secure forum.

To improve our services and products, we sometimes collect de-identified information from web users. That information could include IP addresses or geographical information to ensure your use of our web applications is secure.

How we collect and hold your information

Unless it's unreasonable or impracticable, we will try to collect personal information directly from you (referred to as 'solicited information'). For this reason, it's important that you help us to do this and keep your contact details up to date.

There are a number of ways that we may seek information from you. We might collect your information when you complete a form with us, when you've given us a call or used our website. We also find using electronic means, such as email or SMS, a convenient way to communicate with you and to verify your details

How we collect your information from other sources

Sometimes, we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- we collect information from third parties about the loan or lease made available to you arising out of the services we provide to you
- we can't contact you and we rely on public information to update your contact details
- we exchange information with your legal or financial advisers or other representatives, or
- you don't want to provide us with your personal information.

If you don't provide your information to us, it may not be possible:

- for us to give you the credit assistance you seek from us
- to assist in finding a loan or lease relevant to your circumstances
- verify your identity or protect against fraud, or
- to let you know about other products or services that might be suitable for your financial needs.

How we collect and hold your credit information

We will collect your credit information when you answer the enquiries we make of you relating to the credit assistance you seek from us. In addition to what we say above about collecting information from other sources, other main sources for collecting credit information are:

- your co-loan applicants or co-borrowers
- your guarantors/proposed guarantors
- your employer, accountant, real estate agent or other referees
- your agents and other representatives such as the person who referred your business to us (your solicitors, conveyancers and settlement agents)
- organisations that help us to process credit applications
- organisations that check the security you are offering, such as valuers
- bodies that issue identification documents to help us check your identity, and
- our service providers involved in helping us to process any application you make for credit through us.

How we handle unsolicited information

Sometimes, people share information with us we haven't sought (referred to as 'unsolicited information'). Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

We notify you that we have received your information

When we receive personal information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

How we take care of your personal information

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- document storage security policies
- security measures for access to our systems, and
- only giving access to personal information to a person who is verified to be able to receive that information.

We may store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

When we no longer need your information

We'll only keep your information for as long as we require it for our purposes. We may be required to keep some of your information for certain periods of time under law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

How we use your personal information

The main reasons we collect, hold and use your information

Collecting your personal information allows us to provide you with the products and services you've requested. This means we can use your information to:

- give you credit assistance
- give you information about loan products or related services
- consider whether you are eligible for a loan or lease or any related service you requested
- assist you to prepare an application for a lease or a loan

- administer services we provide, for example to answer requests or deal with complaints, and
- administer payments we receive, or any payments we make, relating to your loan or lease.

Our use of your information for marketing our products and services

We may use or disclose your personal information to advise you of other products or services we or a third party make available that may be of interest to you.

We will always let you know that you can opt out from receiving marketing offers.

With your consent, we may disclose your personal information to third parties for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organisation

Yes, you can opt out

You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will process your request as soon as practicable.

The other ways we use your information

We've just informed you of some of the main reasons we collect your information, so here are some more insights into the ways we use your personal information including:

- identifying you
- telling you about other products or services we make available that may be of interest to you, unless you tell us not to
- allowing us to run our business efficiently and perform general administrative tasks
- preventing any fraud or crime or any suspected fraud or crime
- as required by law, regulations or codes binding us, and
- any purpose to which you have consented.

Who we share your personal information with

To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others. We may share your information with other organisations for any purposes as needed.

Sharing your information

We may use and share your information with other organisations for any purpose described above.

Sharing with your representatives and referees

We may share your information with:

- a representative or any person acting on your behalf (for example, lawyers, settlement agents, accountants or real estate agents)
- your referees, such as your employer, to confirm your details
- third parties
- third parties in relation to services we provide to you. Those third parties may include:
 - a. the mortgage aggregator through whom we may submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel
 - b. the Australian Credit Licence holder that authorises us to engage in credit activities
 - c. referrers that referred your business to us
 - d. valuers
 - e. lenders, lessors, lenders' mortgage insurers and other loan or lease intermediaries
 - f. organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct
 - g. government or regulatory bodies (including ASIC and the Australian Tax Office) as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities
 - h. guarantors and prospective guarantors of your loan or lease

- i. service providers, agents, contractors and advisers that assist us to conduct our business
- j. any organisation that wishes to take an interest in our business or assets, and
- k. any third party to which you consent to us sharing your information.

Sharing outside of Australia

We are not likely to disclose your information to organisations overseas. However, we may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage 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.

How you can access your personal information

How you can generally access your information

We'll always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us in writing to access your personal information that we hold. In some cases we may be able to deal with your request over the phone.

We will give you access to your information in the form you want where it's reasonable and practical. We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first.

We're not always required to give you access to your personal information. Some of the situations where we don't have to give you access include when:

- we believe there is a threat to life or public safety
- there is an unreasonable impact on other individuals
- the request is frivolous
- the information wouldn't be ordinarily accessible because of legal proceedings
- it would prejudice negotiations with you
- it would be unlawful
- it would jeopardise taking action against serious misconduct by you
- it would be likely to harm the activities of an enforcement body (eg, the police), or
- it would harm the confidentiality of our commercial information.

If we can't provide your information in the way you've requested, we will tell you why in writing. If you have concerns, you can complain. See 'Contact us'.

How you can correct your personal information

How we correct your information

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's:

- inaccurate
- out-of-date
- incomplete
- irrelevant, or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try to help where we can – if we can't, then we'll let you know in writing.

The additional steps we must take to correct your credit information

If you ask us to correct credit information, we will help you in the following way.

To help you manage corrections

Whether we made the mistake or if someone else made it, we are required to help you ask for the information to be corrected. So we can do this, we might need to talk to others. However, the most efficient way for you to make a correction request is to send it to the organisation that made the mistake.

Where we correct information

If we're able to correct the information, we'll let you know within five business days of deciding to do this. We'll also let the relevant third parties know as well as any others you tell us about. If there are any instances where we can't do this, then we'll let you know in writing.

Where we can't correct information

If we're unable to correct your information, we'll explain why in writing within five business days of making this decision. If you have any concerns, you can access our external dispute resolution scheme or make a complaint to the Office of the Australian Information Commissioner.

Time frame for correcting information

If we agree to correct your information, we'll do so within 30 days from when you asked, or a longer period that's been agreed by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter
- ask you to agree in writing to give us more time, and
- let you know you can complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

How you can make a complaint

How you can generally make a complaint

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us.

You can contact us by using the details below:

Edgecap Pty Ltd
Tower 4, 727 Collins Street
Melbourne Vic 3008

Phone: 0449 163 337

We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days.

Need more help?

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:

Online: www.oaic.gov.au/privacy

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

+61 2 9284 9666

Mail: GPO Box 5218 Sydney NSW 2001 or GPO Box 2999 Canberra ACT 2601

The additional actions we have to take to manage your complaints about credit information

If your complaint relates to how we handled your access and correction requests

You may take your complaint directly to our external dispute resolution scheme or the Office of the Australian Information Commissioner. You are not required to let us try to fix it first.

For all other complaints relating to credit information

If you make a complaint about credit information (other than an access request or correction request), we will let you know how we will deal with it within seven days.

Ask for more time if we can't fix complaints in 30 days

If we can't rectify complaints within 30 days, we'll let you know why and how long we think it will take. We will also ask you for an extension of time to rectify the matter. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Letting you know about our decision

We'll let you know about our decision within 30 days or any longer agreed time frame. If you have any concerns, you may complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Contact us

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by using the details below:

Edgecap Pty Ltd
Tower 4, 727 Collins Street
Melbourne Vic 3008

Phone: 0449 163 337

What to do if you want to interact with us anonymously or use a pseudonym

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. However we might not always be able to interact with you in this manner as we are often governed by regulations that require us to know who we're dealing with. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable, or
- we are required or authorised by law or a court/tribunal order to deal with you personally.

Government related identifiers

In certain circumstances we may be required to collect government related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.

Changes to this Privacy Policy

This Policy may change. We will let you know of any changes to this Policy by posting a notification on our website.

However we will never ask you for your security details in this way – if you are ever unsure, contact us.

Disputes or complaints

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Disputes or complaints

Disputes or complaints

What to do if you have a dispute or complaint

We are committed to providing our customers with the best possible service. If at any time we have not met our obligations – or you have a complaint about any of our services – please inform us so we can work towards a resolution. We will endeavour to deal with your complaint promptly, thoroughly and fairly.

How to make a complaint and the complaints process

If you have a complaint, we request that you follow these steps:

1. In the first instance, please contact our complaints contact person, Client Name – Client Phone.
2. We may ask for additional information and request you to put your complaint in writing to ensure your issue is properly investigated.
3. In cases where your complaint will take longer to resolve, we will progressively update you.

Third party products and services

If your complaint relates to a product or service acquired through a third party (for example, a lender) we may ask you to contact the relevant third party. They will deal with your complaint under their complaint's resolution process.

If you are not satisfied with the resolution of your complaint by the third party under their complaint's resolution process, you are entitled to have your dispute considered by their External Dispute Resolution Scheme. Please contact the third party for further details.

Keeping you informed

Our complaints area will acknowledge receipt of your complaint within five business days. If unable to resolve the complaint/dispute to your satisfaction within five business days, they will write to you advising the procedures we will follow to investigate and handle your complaint.

Within 45 calendar days from the date you lodged the complaint with us, we will write to you advising the outcome of the investigation and the reason/s for our decision. If required, we will inform you if more time is needed to complete the investigation.

If you are still not satisfied

If you do not think we have resolved your complaint to your satisfaction, you may take the matter – free of charge – to the relevant External Disputes Resolution Scheme (provided it is within the scheme's terms of reference) as detailed below. You may also refer the matter to the relevant External Disputes Resolution Scheme at any time, but if our internal process is still in progress, they may request that our internal processes be complete before considering the matter further.

Our external dispute resolution service provider is the Australian Financial Complaints Authority. It can be contacted via:

- Telephone: 1800 931 678
- Website: <https://www.afca.org.au/>
- Mail: GPO Box 3 Melbourne Victoria 3001

Disclaimer

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Disclaimer

Disclaimer

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Please seek professional advice by calling our office before acting on any information from this website.