

## Privacy Policy

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### City Finance Lending Pty Limited

Company:	City Finance Lending Pty Limited
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**VERSION CONTROL**

<b>Version Number</b>	<b>Date Updated</b>	<b>Notes</b>
1	1 July 2024	Original document prepared and finalised.
2	18 February 2025	Approved by Board
3	1 July 2025	Add additional Jurisdiction
4	23 October 2025	Updates & Clarification
5	06 November 2025	Further Updates & Improvements

## SECTION A – INTRODUCTION

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### 1. INTRODUCTION

- 1.1 As part of City Finance Lending Pty Limited's ("**City Finance**") process to ensure that it continues to maintain the highest levels of professional integrity and ethical conduct, City Finance has adopted this Privacy Policy ("**Policy**") to manage Personal Information in an open and transparent manner.
- 1.2 The provisions of this Policy will assist City Finance in complying with the requirements of the *Privacy Act 1988* (Cth), the *Privacy Regulation 2013* (Cth) and the *Privacy (Credit Reporting) Code 2025* (Cth) and the Australian Privacy Principles in protecting the Personal Information City Finance holds about its clients.

### 2. WHEN DOES THIS POLICY APPLY?

- 2.1 This Policy applies to all representatives and employees of City Finance at all times and the requirements remain in force on an ongoing basis.

### 3. GLOSSARY

TERM	DEFINITION
Affected Information Recipient	Means: (a) a mortgage insurer; or (b) a trade insurer; or (c) a body corporate who is a related body corporate of the City Finance; or (d) a person who: (i) is involved in processing an application for credit made to City Finance; or (ii) manages credit provided by City Finance; or (e) an entity, a legal adviser of the entity or professional adviser of the entity.
APP Entity	means an agency or organisation as defined in section 6 of the Privacy Act 1988.
Australian law	means (a) an Act of the Commonwealth or of a State or Territory; (b) or regulations, or any other instrument, made under such an Act; or (c) a Norfolk Island enactment; or (d) a rule of common law or equity.
Collects	City Finance collects Personal Information only if City Finance collects the Personal Information for inclusion in a record or generally available publication.

Court/Tribunal Order	<p>means an order, direction or other instrument made by:</p> <ul style="list-style-type: none"> <li>(a) a court; or</li> <li>(b) a tribunal; or</li> <li>(c) a judge (including a judge acting in a personal capacity) or a person acting as a judge; or</li> <li>(d) a magistrate (including a magistrate acting in a personal capacity) or a person acting as a magistrate; or</li> <li>(e) a member or an officer of a tribunal;</li> </ul> <p>and includes an order, direction or other instrument that is of an interim or interlocutory nature.</p>
CR Code	<p>refer to the the <i>Privacy (Credit Reporting) Code 2025 (Cth)</i>. This is written code of practice about credit reporting. The CR code supplements the credit reporting provisions contained in Part IIIA of the Privacy Act 1988. A breach of the CR code is a breach of the Privacy Act 1988. The CR code is registered on the OAIC Privacy Register.</p>
Credit Eligibility Information	<p>means Credit Reporting Information that was disclosed to the Credit Provider by a Credit Reporting Body or CP Derived Information. Credit eligibility information is generally held by a Credit Provider and may be disclosed to Affected Information Recipients and other entities in specific circumstances.</p>
Credit Provider	<p>The following entities are included as credit providers for the purposes of the Privacy Act:</p> <ul style="list-style-type: none"> <li>(a) a bank;</li> <li>(b) an organisation or Small Business Operator if a substantial part of its business is the provision of credit, such as a building society, finance company or a credit union;</li> <li>(c) a retailer that issues credit cards in connection with the sale of goods or services;</li> <li>(d) an organisation or Small Business Operator that supplies goods and services where payment is deferred for seven (7) days or more, such as a telecommunications carriers and energy and water utilities; and</li> <li>(e) certain organisations or Small Business Operators that provide credit in connection with the hiring, leasing or renting of goods.</li> </ul> <p>Importantly, the following entities are not credit providers:</p> <ul style="list-style-type: none"> <li>(a) real estate agents;</li> <li>(b) general insurers; and</li> <li>(c) employers.</li> </ul>
CP Derived Information	<p>means any Personal Information (other than Sensitive Information) about an individual:</p>

	<ul style="list-style-type: none"> <li>(a) that is derived from Credit Reporting Information about the individual that was disclosed to a Credit Provider by a Credit Reporting Body; and</li> <li>(b) that has any bearing on the individual's credit worthiness; and</li> <li>(c) that is used, has been used or could be used in establishing the individual's eligibility for consumer credit.</li> </ul>
Credit Information	<p>means Personal Information that is:</p> <ul style="list-style-type: none"> <li>(a) identification information about the individual; or</li> <li>(b) consumer credit liability information about the individual; or</li> <li>(c) repayment history information about the individual; or</li> <li>(d) a statement that an information request has been made in relation to the individual by a Credit Provider, mortgage insurer or trade insurer; or</li> <li>(e) the type of consumer credit or commercial credit, and the amount of credit, sought in an application: <ul style="list-style-type: none"> <li>(i) that has been made by the individual to a Credit Provider; and</li> <li>(ii) in connection with which the provider has made an information request in relation to the individual; or</li> </ul> </li> <li>(f) default information about the individual; or</li> <li>(g) payment information about the individual; or</li> <li>(h) new arrangement information about the individual; or</li> <li>(i) court proceedings information about the individual; or</li> <li>(j) personal insolvency information about the individual; or</li> <li>(k) publicly available information about the individual: <ul style="list-style-type: none"> <li>(i) that relates to the individual's activities in Australia or the external Territories and the individual's credit worthiness; and</li> <li>(ii) that is not court proceedings information about the individual or information about the individual that is entered or recorded on the National Personal Insolvency Index; or</li> </ul> </li> <li>(l) the opinion of a Credit Provider that the individual has committed, in circumstances specified by the provider, a serious credit infringement in relation to consumer credit provided by the provider to the individual.</li> </ul>
Credit Reporting Body	means a business or undertaking that involves collecting, holding, using or disclosing Personal Information about individuals for the purpose of, or for purposes including the purpose of, providing an entity with information about the credit worthiness of an individual.
Credit Reporting Information	means Credit Information or Credit Reporting Body derived information about an individual.
De-identified	Personal Information is <i>de-identified</i> if the information is no longer about an identifiable individual or an individual who is reasonably identifiable.

Holds	City Finance <i>holds</i> Personal Information if it has possession or control of a record that contains the Personal Information.
Identifier of an individual	means a number, letter or symbol, or a combination of any or all of those things, that is used to identify the individual or to verify the identity of the individual, but does not include:  (a) the individual's name; or  (b) the individual's ABN (within the meaning of the A New Tax System (Australian Business Number) Act 1999); or  (c) anything else prescribed by the regulations.
Permitted General Situation	As defined in s16A of the Privacy Act 1988
Personal Information	means information or an opinion about an identified individual, or an individual who is reasonably identifiable:  (a) whether the information or opinion is true or not; and  (b) whether the information or opinion is recorded in a material form or not.
Sensitive Information	means  (a) information or an opinion about an individual's:  (i) racial or ethnic origin; or  (ii) political opinions; or  (iii) membership of a political association; or  (iv) religious beliefs or affiliations; or  (v) philosophical beliefs; or  (vi) membership of a professional or trade association; or  (vii) membership of a trade union; or  (viii) sexual orientation or practices; or  (ix) criminal record;  that is also Personal Information; or  (b) health information about an individual; or  (c) genetic information about an individual that is not otherwise health information.
Small Business Operators	is a person or organisation that has an annual turnover of \$3,000,000 or less. For the purposes of the Privacy Act 1988 health service providers or businesses that trade in Personal Information are not Small Business Operators.

## SECTION B – COLLECTION OF INFORMATION (SOLICITED INFORMATION)



This Section B applies to the collection of information that is solicited by City Finance.

#### **4. PERSONAL INFORMATION**

4.1 The Personal Information City Finance collects may include the following:

- (a) name;
- (b) address;
- (c) date of birth;
- (d) gender;
- (e) marital status;
- (f) occupation;
- (g) bank account details;
- (h) contact details (including telephone, facsimile and e-mail);
- (i) financial information (including transactional and trading history); and
- (j) any other information City Finance considers necessary to their functions and activities.

4.2 City Finance must not collect Personal Information (other than Sensitive Information) unless the information is reasonably necessary for one or more of City Finance's functions or activities.

4.3 City Finance's functions or activities include:

- (a) operate as credit provider to provide unsecured personal loans that relate to:
  - (i) Personal loans
  - (ii) Small amount loans;
  - (iii) Medium amount loans.
- (b) typical consumers are Australian Citizens and Residents, residing in Australia, over the age of 18 years, employed with a level of income which supports the affordability of credit product(s) provided by City Finance.

#### **5. SENSITIVE INFORMATION**

5.1 City Finance will not collect Sensitive Information about an individual unless:

- (a) the individual consents to the collection of the information and the information is reasonably necessary for one or more of City Finance's functions or activities (as described in section 4.3); or
- (b) the collection of the information is required or authorised by or under an Australian law or a Court/Tribunal Order; or

- (c) a Permitted General Situation exists in relation to the collection of the information by City Finance; or
- (d) a permitted health situation exists in relation to the collection of the information by City Finance; or
- (e) the collection of the information is inadvertently derived from, and limited to, bank transaction data and grouping of financial transactions for one or more of City Finance's functions or activities (as described in section 4.3).

## **6. CREDIT-RELATED INFORMATION**

- 6.1 Where City Finance receives a request for credit, the prospective client will be required to provide City Finance with Credit Information. Refer to City Finance's Credit Reporting Policy for further information.
- 6.2 Please note that consent is not required for Credit Information requests under the *CR Code*, however, before making such a request, we will provide you with a notice that:
  - (a) we may obtain information about you from a Credit Reporting Body for a permitted credit-related purpose;
  - (b) your consent is not required for this request;
  - (c) a record of the request may be included in your credit report and visible to other credit providers; and
  - (d) the existence of this enquiry may affect your credit score or credit rating in general terms;
  - (e) further details of the Credit Reporting Bodies we use and how you may obtain a copy of your credit report, request a correction, or make a complaint are particularised in our Credit Report Policy and Credit Reporting Statement available on our website.

## **7. MEANS OF COLLECTION**

- 7.1 City Finance must only collect Personal Information by lawful and fair means.
- 7.2 City Finance must only collect Personal Information about an individual from the individual (rather than someone else), unless it is unreasonable or impracticable to do so or the individual has instructed City Finance to liaise with someone else.
- 7.3 City Finance will collect Personal Information from an individual when:
  - (a) City Finance's Application Form is completed;
  - (b) a Client provides the information to City Finance's representatives over the telephone or via email;
  - (c) a Client provides the information to City Finance on its website;
- 7.4 City Finance may collect Personal Information from an individual from others, such as from:
  - (a) service providers;

- (b) agents;
- (c) advisors;
- (d) employers; or
- (e) family members.

7.5 City Finance may verify an individual's identity using the Commonwealth Document Verification Service (DVS). This is a secure system operated under the Identity Verification Services Act 2023 (Cth) that enables information on an individual's identity documents (such as driver's licence, passport, or Medicare card) to be checked against official government records. City Finance may use this service only with the express consent of the individual before any DVS check occurs.

7.6 City Finance may also collect certain financial and transactional information including bank account and bank transaction data directly from an individual's nominated bank account via secure upload or through an accredited third-party service provider using screen scraping technology (for example, through illion Open Data Solutions Pty Ltd or Experian Australia Operations Pty Ltd). This process allows City Finance to verify your income, expenses, and financial position as part of your credit application.

7.7 At the time of collection of bank account and bank transaction data, individuals are to be notified that this process will occur and are required to provide consent before any information is retrieved. Individuals are then directed to the third-party service provider's website in order for them to provide authorisation for the collection of account information for a single use (e.g. for City Finance's loan application assessment). The third-party service provider will complete a one-time retrieval of the individual's account information (using the Credentials they have entered which may include username/account name and password). Where access to the account information is made by using an individual's Credentials, the third-party service provider will immediately destroy the Credentials after they use them. For further information relating to the third party services providers use and collection of account information including Credentials see illion Open Data Solutions Pty Ltd's [Illion End User Terms](#) and Experian Australia Operations Pty Ltd's [Experian Privacy Policy](#).

## **8. PURPOSE OF COLLECTION**

### **8.1 Primary Purpose of Collection**

If an individual is acquiring or has acquired a product or service from City Finance, the individual's Personal Information will be collected and held for the purposes of:

- (a) checking whether an individual is eligible for City Finance's product or service;
- (b) providing, managing and administering the requested credit or financial service;
- (c) verifying an individual's identity and financial position as part of credit and anti-money-laundering obligations;
- (d) collecting payments that are owed to City Finance in respect of any credit previously provided to the individual;

- (e) protecting against fraud, crime or other activity which may cause harm in relation to City Finance's products or services;
- (f) complying with legislative and regulatory requirements in any jurisdiction, including the *National Consumer Credit Protection Act 2009 (Cth)* ("NCCP Act"), the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* ("AML/CTF Act"), the *Privacy Act 1988 (Cth)* and the *Privacy (Credit Reporting) Code* ("CR Code");
- (g) responding to a complaints, hardship requests or disputes; and
- (h) supporting City Finance's internal governance, compliance reviews, and audit processes.

## 8.2 Identity Verification through the Document Verification Service (DVS)

Where identity information is verified through the DVS, it is used solely to confirm that details provided on an individual's identification documents match those held by the issuing agency. City Finance retain identification details that an individual provides directly (such as your driver licence number, medicare card or passport details) as part of the customer file, for lawful purposes including identity verification, compliance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and credit record keeping. Information retrieved from the DVS itself (for example, match results) is not stored beyond what is necessary for compliance or audit purposes.

## 8.3 Bank Transaction and Financial Information

City Finance collects certain financial and transactional data — including bank-account and bank-transaction information provided through secure upload or electronic retrieval (screen scraping) — for the following primary purposes:

- a) Responsible Lending (NCCP Act): to verify income (such as salary deposits or government benefits), confirm regular expenses and liabilities, and assess serviceability to ensure any loan is not unsuitable;
- b) Customer Due Diligence (AML/CTF Act): to verify the source of funds, detect unusual or suspicious transactions, and maintain records for AUSTRAC reporting requirements; and
- c) Fraud Prevention and Identity Verification: to cross-check application information and detect identity theft, falsified documents, or unauthorised third-party applications;
- d) Complaints: to respond to complaints, hardship requests or disputes.

8.4 City Finance does not collect, store or access any individual's internet-banking credentials (such as usernames or passwords)

## 8.5 Secondary Purposes of Collection

City Finance may also use or disclose Personal Information for secondary purposes where:

- a) the individual has expressly consented;
- b) the use or disclosure is reasonably expected and directly related to the primary purpose (for example, quality assurance, system maintenance, training, or responding to regulators)
- c) is required or authorised by law; or

- d) it is necessary to assist City Finance in the ordinary operation of its business, including communicating with related service providers, technology contractors, or professional advisers who are subject to confidentiality obligations.

## **8.6 Direct Marketing**

City Finance may also collect and use Personal Information to let individuals know about products or services that may better meet their needs or other opportunities in which they may be interested. Please refer to Section G for further information on direct-marketing practices and opt-out rights.

## **SECTION C – COLLECTION OF INFORMATION (UNSOLICITED INFORMATION)**

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### **9. DEALING WITH UNSOLICITED PERSONAL INFORMATION**

#### **9.1 If City Finance:**

- (a) receives Personal Information about an individual; and
- (b) the information is not solicited by City Finance

City Finance must, within a reasonable period after receiving the information, determine whether or not it was permitted to collect the information under Section B above.

#### **9.2 City Finance may use or disclose the Personal Information for the purposes of making the determination under paragraph 9.1.**

#### **9.3 If City Finance:**

- (a) determines that it could not have collected the Personal Information; and
- (b) the information is not contained in a Commonwealth record,

City Finance must as soon as practicable, destroy the information or ensure that the information is De-identified, only if it is lawful and reasonable to do so.

## **SECTION D – NOTIFICATION OF THE COLLECTION OF INFORMATION**

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### **10. CREDIT REPORTING AND PRIVACY STATEMENT**

#### **10.1 City Finance's Director must ensure that at all times it maintains a clearly expressed and up-to-date Credit Reporting and Privacy Statement that:**

- (a) is current and reflects the latest applicable Australian laws;
- (b) contains the following information: and
  - (i) the kinds of Credit Information, Credit Eligibility Information and Personal Information that City Finance collects and holds, and how City Finance collects and holds that information;
  - (ii) the kinds of CP Derived Information that City Finance usually derives from Credit Reporting Information disclosed to City Finance by a Credit Reporting Body;

- (iii) the purposes for which City Finance collects, holds, uses and discloses Credit Information, Credit Eligibility Information and Personal Information;
  - (iv) how an individual may access Credit Eligibility Information and Personal Information held by City Finance and seek a correction of such information;
  - (v) how an individual may complain about a failure of City Finance to comply with the Privacy Act 1988 or CR Code and how City Finance will deal with such a complaint;
  - (vi) whether City Finance is likely to disclose Credit Information and Credit Eligibility Information to entities that do not have an Australian link; and
  - (vii) where City Finance is likely to disclose Credit Information or Credit Eligibility Information to entities that do not have an Australian link, the countries in which such entities are likely to be located.
- (c) before making such a Credit Information request, notice that:
- (i) we may obtain information about you from a Credit Reporting Body for a permitted credit-related purpose;
  - (ii) your consent is not required for this request;
  - (iii) a record of the request may be included in your credit report and visible to other credit providers; and
  - (iv) the existence of this enquiry may affect your credit score or credit rating in general terms.

10.2 City Finance must ensure that City Finance's Credit Reporting and Privacy Statement is available free of charge and in such form as appropriate. City Finance will make the Credit Reporting and Privacy Statement available on its website.

10.3 If the Credit Reporting and Privacy Statement is requested in a particular form, City Finance will take such steps as are reasonable to provide the Credit Reporting and Privacy Statement in the form requested.

## SECTION E – USE OR DISCLOSURE OF INFORMATION

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### 11. USE OR DISCLOSURE OF PERSONAL INFORMATION

11.1 Where City Finance holds Personal Information about an individual that was collected for a particular purpose ("**the primary purpose**"), City Finance must not use or disclose the information for another purpose ("**the secondary purpose**") unless:

- (a) the individual has consented to the use or disclosure of the information; or
- (b) the individual would reasonably expect City Finance to use or disclose the information for the secondary purpose and the secondary purpose is:
  - (i) directly related to the primary purpose (if the information is Sensitive Information); or

- (ii) related to the primary purpose (if the information is *not* Sensitive Information); or
- (c) the use or disclosure of the information is required or authorised by or under an Australian law or a Court/Tribunal Order; or
- (d) a Permitted General Situation exists in relation to the use or disclosure of the information by City Finance; or
- (e) City Finance reasonably believes 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.

11.2 Where City Finance uses or discloses Personal Information in accordance with section 11.1(e), City Finance will keep a copy of this disclosure (e.g. the email or letter used to do so).

11.3 This section 11 does not apply to:

- (a) Personal Information for the purposes of direct marketing; or
- (b) government related identifiers.

## **12. WHO DOES CITY FINANCE DISCLOSE PERSONAL INFORMATION TO?**

12.1 City Finance may disclose Personal Information collected from clients and prospective clients to the following:

- (a) organisations involved in providing, managing or administering City Finance's products or services such as third party suppliers, e.g. printers, posting services and our advisers;
- (b) organisations involved in maintaining, reviewing and developing City Finance's business systems, procedures and infrastructure, including testing or upgrading City Finance's computer systems;
- (c) organisations involved in a corporate re-organisation;
- (d) organisations involved in the payments system, including financial institutions, merchants and payment organisations;
- (e) organisations involved in product planning and development;
- (f) other organisations, who jointly with City Finance's, provide its products or services;
- (g) authorised representatives who provide City Finance's products or services on its behalf;
- (h) the individual's representatives, including your legal advisers;
- (i) Credit Reporting Bodies including Equifax Pty Ltd, illion Australia Pty Ltd, Experian Australia Pty Ltd
- (j) debt collectors including Capital Credit Solutions Pty Ltd and/or InDebted Australia Pty Ltd;
- (k) City Finance's financial advisers, legal advisers or auditors;

- (l) fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- (m) external dispute resolution schemes;
- (n) regulatory bodies, government agencies and law enforcement bodies in any jurisdiction;
- (o) approved DVS Gateway Service Provider(s) and Intermediary Service Providers (including GBG ANZ Pty Ltd t/as Green ID Data Zoo Pty Ltd) who facilitate identity verification checks on our behalf. These providers are appointed as Information Match Agents under the DVS Access Policy and are bound by confidentiality, security, and data-handling obligations equivalent to those in our Participation Agreement;
- (p) where required by the DVS Framework Administrator or Australian Government agencies responsible for the DVS, information about our use of the system (not your document details) may be disclosed for audit or compliance purposes.

12.2 City Finance may also disclose your Personal Information to others where:

- (a) they are required to disclose information by law e.g. under court orders or statutory notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter-terrorism financing;
- (b) an individual may have expressly consented to the disclosure or the individual's consent may be reasonably inferred from the circumstances; or
- (c) they are otherwise permitted to disclose the information under applicable Privacy Laws.

12.3 City Finance may also disclose limited personal information derived from bank account and bank transaction data to third parties where necessary to assess an individual's credit application, manage a loan, or comply with legal and regulatory obligations. This may include Credit Reporting Bodies (Equifax Pty Ltd, illion Australia Pty Ltd, Experian Australia Pty Ltd), external collection agencies (Capital Credit Solutions Pty Ltd and/or InDebted Australia Pty Ltd), and technical support providers who maintain our systems under strict confidentiality controls.

## **SECTION F – DIRECT MARKETING**

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### **13. DIRECT MARKETING**

13.1 City Finance must not use or disclose the Personal Information it holds about an individual for the purpose of direct marketing.

### **14. EXCEPTION – PERSONAL INFORMATION OTHER THAN SENSITIVE INFORMATION**

14.1 City Finance may use or disclose Personal Information (other than Sensitive Information) about an individual for the purposes of direct marketing if:

- (a) City Finance collected the information from the individual; and the individual would reasonably expect City Finance to use or disclose the information for that purpose; or
- (b) City Finance has collected the information from a third party; and either:



- (i) City Finance has obtained the individual's consent to the use or disclose the information for the purpose of direct marketing; or
- (ii) it is impracticable for City Finance to obtain the individual's consent; and
- (c) City Finance provides a simple way for the individual to opt out of receiving direct marketing communications from City Finance;
- (d) in each direct marketing communication with the individual City Finance:
  - (i) includes a prominent statement that the individual may opt out of receiving direct marketing; or
  - (ii) directs the individual's attention to the fact that the individual may opt out of receiving direct marketing; and
- (e) the individual has not made a request to opt out of receiving direct marketing.

## **15. EXCEPTION – SENSITIVE INFORMATION**

15.1 City Finance may use or disclose Sensitive Information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose.

## **16. REQUESTS TO STOP DIRECT MARKETING**

16.1 Where City Finance uses or discloses Personal Information about an individual for the purposes of direct marketing by City Finance or facilitating direct marketing by another organisation, the individual may request:

- (a) that City Finance no longer provide them with direct marketing communications;
- (b) that City Finance does not use or disclose the individual's Personal Information for the purpose of facilitating direct marketing by another organisation;
- (c) that City Finance provides the source of the Personal Information.

16.2 Where City Finance receives a request from an individual under section 16.1, City Finance will:

- (a) give effect to the request under section 16.1(a) or 16.1(b) within a reasonable period after the request is made and free of charge; and
- (b) notify the individual of the source of the information, if the individual requests it, unless it is impracticable or unreasonable to do so.

16.3 This Section F does not apply to the extent that the following laws apply:

- (a) the Do Not Call Register Act 2006;
- (b) the Spam Act 2003; or
- (c) any other Act of the Commonwealth of Australia.

## **SECTION G – CROSS BORDER DISCLOSURE OF INFORMATION**

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### **17. DISCLOSING PERSONAL INFORMATION TO CROSS BORDER RECIPIENTS**

17.1 Where City Finance discloses Personal Information about an individual to a recipient who is not in Australia and who is not City Finance or the individual, City Finance must ensure that the overseas recipient does not breach the Australian Privacy Principles (with the exception of APP1).

17.2 The countries we may disclose an individual's Personal Information to include:

- (a) Australia;
- (b) India;
- (c) Fiji
- (d) Philippines.

17.3 Personal information is not actively transmitted overseas, however, in limited cases, contractors engaged overseas may have incidental access when maintaining our systems or conducting office administration or collection services

17.4 Section 17.1 does not apply where:

- (a) City Finance reasonably believes that:
  - (i) information is subject to a law or binding scheme that has the effect of protecting the information in a way that is at least substantially similar to the way in which the Australian Privacy Principles protect the information; and
  - (ii) there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- (b) both of the following apply:
  - (i) City Finance has informed the individual that if they consent to the disclosure of information City Finance will not take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles; and
  - (ii) after being so informed, the individual consents to disclosure;
- (c) the disclosure of the information is required or authorised by or under an Australian law or a Court/Tribunal Order; or
- (d) a Permitted General Situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A(1) of the Privacy Act 1988) exists in relation to the disclosure of the information by City Finance.

17.5 When Personal Information (including Credit Information) is stored in cloud environments accessible from multiple countries, City Finance will take reasonable steps to ensure those service providers comply with the Privacy Laws.

## **SECTION H – ADOPTION, USE OR DISCLOSURE OF GOVERNMENT IDENTIFIERS**

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### **18. ADOPTION OF GOVERNMENT RELATED IDENTIFIERS**

18.1 City Finance must not adopt a government related identifier of an individual as its own identifier unless:

- (a) City Finance is required or authorised by or under an Australian law or a Court/Tribunal Order to do so; or
- (b) the identifier, City Finance and the circumstances of the adoption are prescribed by regulations.

### **19. USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS**

19.1 Before using or disclosing a government related identifier of an individual, City Finance must ensure that such use or disclosure is:

- (a) reasonably necessary for City Finance to verify the identity of the individual for the purposes of the organisation's activities or functions; or
- (b) reasonably necessary for the organisation to fulfil its obligations to an agency or a State or Territory authority; or
- (c) required or authorised by or under an Australian law or a Court/Tribunal Order; or
- (d) within a Permitted General Situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A(1) of the Privacy Act 1988; or
- (e) reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (f) the identifier, City Finance and the circumstances of the adoption are prescribed by regulations.

## **SECTION I – INTEGRITY OF INFORMATION**

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### **20. QUALITY OF INFORMATION**

20.1 City Finance will ensure that the Personal Information it collects and the Personal Information it uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up to date, complete and relevant.

### **21. SECURITY OF INFORMATION**

21.1 City Finance will ensure that it protects any Personal Information it holds from misuse, interference, loss, unauthorised access, modification and disclosure.

21.2 City Finance will take reasonable steps to destroy or de-identify Personal Information it holds where:

- (a) City Finance no longer needs the Personal Information for any purpose for which the information may be used or disclosed by City Finance; and

- (b) the information is not contained in a Commonwealth record; and
- (c) City Finance is not required to retain that information under an Australian law, or a Court/Tribunal Order.

## **22. STORAGE OF INFORMATION**

22.1 City Finance stores Personal Information in different ways, including:

- (a) hard copy on site at City Finance's head office;
- (b) electronically secure data centres which are located in Australia and owned by either City Finance or external service providers;

22.2 In order to ensure City Finance protects any Personal Information it holds from misuse, interference, loss, unauthorised access, modification and disclosure, City Finance implements the following procedure/system:

- (a) access to information systems is controlled through identity and access management;
- (b) employees are bound by internal information securities policies and are required to keep information secure;
- (c) all employees are required to complete training about information security;
- (d) City Finance regularly monitors and reviews its compliance with internal policies and industry best practice; and

22.3 City Finance maintains and stores records of any Personal Information and any decline-notices issued under s 20U(3) of the Privacy Act 1988 for a minimum of seven (7) years in accordance with the *CR Code*.

## **SECTION J – ACCESS TO PERSONAL INFORMATION**

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### **23. ACCESS**

23.1 City Finance must give an individual access to the Personal Information it holds about the individual if so requested by the individual.

23.2 An individual can request access to their Personal Information by contacting City Finance's Complaints Officer on **07 3458 9200** or put their request in writing and send it to **complaints@cityfinance.com.au**.

23.3 City Finance must respond to any request for access to Personal Information within a reasonable period after the request is made.

23.4 City Finance must give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so and must take such steps as are reasonable in the circumstances to give access in a way that meets the needs of City Finance and the individual.

23.5 City Finance must not charge an individual for making a request, and must not impose excessive charges for the individual to access their Personal Information.

## **24. WRITTEN NOTICE OF CREDIT REFUSAL**

- 24.1 If City Finance decline an application for consumer credit wholly or partly based on information obtained from a Credit Reporting Body, they will issue a written notice that:
- (a) states that the decision was based wholly or partly on information from a Credit Reporting Body;
  - (b) identifies the Credit Reporting Body used and provides its contact details; and
  - (c) advises the individual of their right to obtain a free copy of your credit report from that Credit Reporting Body within 90 days and to seek correction of any errors.
- 24.2 City Finance are not required to provide detailed reasons for a credit refusal, but will ensure that any information relied upon has been obtained and used in compliance with the Privacy Laws.

## **25. EXCEPTIONS**

- 25.1 City Finance is not required to give an individual access to their Personal Information if:
- (a) City Finance reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
  - (b) giving access would have an unreasonable impact on the privacy of other individuals; or
  - (c) the request for access is frivolous or vexatious; or
  - (d) the information relates to existing or anticipated legal proceedings between City Finance and the individual, and would not be accessible by the process of discovery in those proceedings; or
  - (e) giving access would reveal intentions of City Finance in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
  - (f) giving access would be unlawful; or
  - (g) denying access is required or authorised by or under an Australian law or a Court/Tribunal Order; or
  - (h) City Finance has reason that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
  - (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
  - (j) giving access would reveal evaluative information generated within City Finance in connection with a commercially sensitive decision-making process.

## **26. REFUSAL TO GIVE ACCESS**

- 26.1 If City Finance refuses to give access in accordance with section 23 or to give access in the manner requested by the individual, City Finance will give the individual a written notice that sets out:
- (a) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
  - (b) the mechanisms available to complain about the refusal; and
  - (c) any other matter prescribed by the regulations.
- 26.2 Where City Finance refuses to give access under section 25.1(j) City Finance may include an explanation of the commercially sensitive decision in its written notice of the reasons for denial.

## **SECTION K – CORRECTION OF INFORMATION**

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### **27. CORRECTION OF INFORMATION**

- 27.1 City Finance must take reasonable steps to correct all Personal Information, having regard to the purpose for which the information is held where:
- (a) City Finance is satisfied the information is inaccurate, out of date, incomplete, irrelevant or misleading; or
  - (b) the individual requests City Finance corrects the information.
- 27.2 An individual can request City Finance correct any the information held by contacting City Finance's Complaints Officer on **07 3458 9200** or put their request in writing and send it to **complaints@cityfinance.com.au**
- 27.3 Where City Finance corrects Personal Information about an individual that City Finance previously disclosed to another APP Entity and the individual requests City Finance to notify the other APP Entity of the correction, City Finance must take reasonable steps to give that notification, unless it is impracticable or unlawful to do so.

### **28. REFUSAL TO CORRECT INFORMATION**

- 28.1 If City Finance refuses to correct Personal Information as requested by the individual, City Finance will give the individual a written notice that sets out:
- (a) the reasons for the refusal except to the extent that it would be unreasonable to do so; and
  - (b) the mechanisms available to complain about the refusal; and
  - (c) any other matter prescribed by the regulations.

### **29. REQUEST FROM A CLIENT TO ASSOCIATE A STATEMENT WITH THEIR INFORMATION**

- 29.1 If:
- (a) City Finance refuses to correct Personal Information as requested by the individual; and

- (b) the individual requests that City Finance associate a statement noting that the information is inaccurate, out of date, incomplete, irrelevant or misleading, with the individual's information,

City Finance must take such steps as are reasonable in the circumstances to associate the statement (as described in section 29.1(b)) with the individual's Personal Information. The statement should be associated with the information in such a way that will make the statement apparent to users of the information.

### **30. DEALING WITH REQUESTS**

#### **30.1 City Finance must:**

- (a) respond to requests under this Section K within thirty (30) days after the request is made; and
- (b) must not charge the individual for the making of the request, for correcting the Personal Information or for associating the statement with the Personal Information.

### **SECTION L – MAKING A PRIVACY COMPLAINT**

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#### **31. COMPLAINTS**

31.1 City Finance offers a free internal complaint resolution scheme to all customers. Should a client have a privacy complaint, they are to contact City Finance to discuss their concerns using the following contact details:

- (a) **Email: [complaints@cityfinance.com.au](mailto:complaints@cityfinance.com.au)**
- (b) **Phone: 07 3458 9200**
- (c) **Post: City Finance, Suite 134, 7 Clunies Ross Ct Eight Mile Plains QLD 4113**

31.2 Copies of City Finance's Complaints Management Policy and Dispute Resolution Policy can be accessed at [Policies - City Finance](#).

31.3 To assist City Finance in helping customers, City Finance asks customers to follow a simple three-step process:

- (a) gather all supporting documents relating to the complaint;
- (b) contact City Finance to review your situation and if possible, resolve your complaint immediately; and
- (c) if the matter is not resolved to the customer's satisfaction, customers are encouraged to contact City Finance's Complaints Officer on **07 3458 9200** or put their complaint in writing and send it to **[complaints@cityfinance.com.au](mailto:complaints@cityfinance.com.au)**.

31.4 City Finance will rectify any breach if the complaint is justified and takes necessary steps to resolve the issue.

- 31.5 In certain situations, to deal with a complaint it may be necessary to consult with third parties. However, any disclosure of Personal Information to third parties will be provided with the customer's authority and consent.
- 31.6 After a complaint has been received, City Finance sends the customer a written notice of acknowledgement setting out the process. The complaint is investigated, and the decision sent to the customer within thirty (30) days unless the customer has agreed to a longer time. If a complaint cannot be resolved within the agreed time frame or a decision could not be made within thirty (30) days of receipt, a notification will be sent to the customer setting out the reasons and specifying a new date when the customer can expect a decision or resolution.

## **32. IF YOU ARE UNHAPPY WITH OUR RESPONSE**

If the customer is not satisfied with City Finance's internal privacy practices or the outcome in respect to complaint, the customer may approach the following with their complaint:

(a) **Office of the Australian Information Commissioner**

**Address:** GPO Box 5218, Sydney NSW 2001

**Phone:** 1300 363 992

**Web Complaint Form:** [OAIC Privacy Complaint Form](#)

**Website:** [oaic.gov.au](http://oaic.gov.au)

(b) **Australian Financial Complaints Authority Limited**

**Address:** GPO Box 3 Melbourne VIC 3001

**Phone:** 1800 931 678

**Fax:** (03) 9613 6399

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

**Website:** <https://www.afca.org.au/>

AFCA is an independent and external dispute resolution scheme, of which City Finance is a member.

## **SECTION M – MISCELLANEOUS**

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### **33. POLICY BREACHES**

- 33.1 Breaches of this Policy may lead to disciplinary action being taken against the relevant party, including dismissal in serious cases and may also result in prosecution under the law where that act is illegal. This may include re-assessment of bonus qualification, termination of employment and/or fines (in accordance with the Privacy Act 1988).
- 33.2 Staff are trained internally on compliance and their regulatory obligation to City Finance. They are encouraged to respond appropriately to and report all breaches of the law and other



incidents of non-compliance, including City Finance's policies, and seek guidance if they are unsure.

33.3 Staff must report breaches of this Policy directly to the Director.

#### **34. RETENTION OF NOTIFIABLE DATA BREACH FORMS**

34.1 The Compliance Officer will retain the completed Notifiable Data Breach Forms for seven (7) years in accordance with City Finance's Document Retention Policy. The completed forms are retained for future reference and review.

34.2 As part of their training, all staff are made aware of the need to practice thorough and up to date record keeping, not only as a way of meeting City Finance's compliance obligations, but as a way of minimising risk.

#### **35. POLICY REVIEW**

35.1 City Finance's Privacy Policy will be reviewed by the Compliance Officer annually having regard to the changing circumstances of the Company and immediately after any amendment to the Privacy Law or OAIC Guidance to ensure continued compliance.

Issued by ***City Finance Lending Pty Limited*** – 6 November 2025