

Privacy Policy

Effective Date: 1st January 2024

1. Our Commitment to Your Privacy

Spin Finance Brokers | ABN: 90 472 802 629 is committed to protecting your privacy. We understand the importance of safeguarding your personal and sensitive information. This policy outlines how we collect, use, store, and disclose your personal information in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**.

By using our website or engaging with our services, you consent to the collection, use, and disclosure of your personal information as described in this policy.

2. What is Personal Information?

Personal information is any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether it is recorded in a material form or not.

3. What Kinds of Personal Information Do We Collect?

To provide you with mortgage broking and financial services, we may collect and hold various types of personal information, including:

- **Identification Information:** Your full name, date of birth, current and previous addresses, and contact details (phone number, email address).
- **Financial Information:** Your income, expenses, assets, liabilities, account details, and details of your financial dependants.
- **Employment Information:** Your occupation, employment status, and history.
- **Credit-Related Information:** Information relating to your credit history, including credit accounts, repayment history, and any serious credit infringements. This may be collected from credit reporting bodies.
- **Sensitive Information:** In some cases, we may need to collect sensitive information, such as information about your health (e.g., for insurance applications) or criminal record. We will only collect this information with your consent and if it is reasonably necessary for our services.

We may also collect information about your interactions with our website, such as your IP address, device type, browser information, and browsing activity, through the use of cookies and analytics tools.

4. How and Why We Collect Your Personal Information

We collect personal information directly from you when it is reasonable and practical to do so. This may occur when you:

- Complete an inquiry form on our website.
- Use our online calculators.
- Engage with us via phone, email, or in person.
- Complete a loan application with us.

We may also collect your personal information from third parties, including:

- Lenders, mortgage insurers, and other financial institutions.
- Credit reporting bodies.
- Your employer, accountant, or other professional advisers.
- Property valuers or real estate agents.
- Referrers or third-party lead generation services.

We collect your personal information for the following purposes:

- To assess your eligibility for finance and provide you with credit assistance.
- To prepare and submit loan applications on your behalf.
- To manage our relationship with you and provide ongoing services.
- To verify your identity and protect against fraud.
- To inform you of products, services, and offers that may be of interest to you (see Section 8 for more on direct marketing).
- To comply with our legal and regulatory obligations, including anti-money laundering and counter-terrorism financing laws.
- To improve our website and services.

5. Anonymity and Pseudonymity

Where it is lawful and practicable, you have the option of dealing with us anonymously or by using a pseudonym. For example, if you are making a general inquiry about our services without requesting credit assistance. However, for us to provide you with specific mortgage broking services and credit assistance, it is a legal and practical requirement that we collect and verify your identity.

6. Disclosure of Your Personal Information

We may disclose your personal information to other organisations to enable us to provide our services and manage our business. These may include:

- Lenders, banks, and other financial institutions to process your loan application.
- Mortgage insurers, credit reporting bodies, and other third-party service providers involved in the loan application process.
- External service providers that assist our business operations, such as IT and data storage providers, professional advisers (e.g., accountants, lawyers), and marketing agencies.
- Our related bodies corporate, employees, and contractors.
- Anyone you have consented to us disclosing information to.
- Government and regulatory bodies (e.g., the Australian Taxation Office, AUSTRAC) where required or authorised by law.

Overseas Disclosure

In some circumstances, we may need to disclose your personal information to overseas recipients, for example, if our data hosting or cloud service providers are located outside of Australia. We will take reasonable steps to ensure that the overseas recipient handles your personal information in a manner that is consistent with the Australian Privacy Principles.

7. Data Quality and Security

We take reasonable steps to ensure that the personal information we collect, use, and disclose is accurate, complete, and up-to-date. We also take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification, or disclosure.

We store your information in secure physical and electronic environments, including password-protected servers and encrypted databases. We will destroy or de-identify personal information that is no longer required for any purpose for which it may be used or disclosed by us, as required by law.

8. Direct Marketing

We may use your personal information to provide you with information about products and services that may be of interest to you. This may include new services, offers, or general industry news. We may contact you by email, SMS, or other electronic means.

You have the right to opt-out of receiving direct marketing communications from us at any time. You can do this by following the unsubscribe instructions in our marketing emails or by contacting us using the details below.

9. Accessing and Correcting Your Personal Information

You have the right to request access to the personal information we hold about you. You can also request that we correct any information that is inaccurate, incomplete, or out-of-date.

To make a request for access or correction, please contact us using the details provided below. We will respond to your request within a reasonable time and, in most cases, will provide you with access to your information free of charge. We may, however, charge a reasonable fee for the time and cost of providing access if your request is complex or resource-intensive.

In certain circumstances, we may refuse your request for access or correction, as permitted by the APPs. If we refuse your request, we will provide you with a written explanation for our decision.

10. Complaints

If you believe that we have breached the Privacy Act or the Australian Privacy Principles, you may make a complaint to us. All complaints will be handled in a fair and timely manner.

To make a complaint, please contact our Privacy Officer in writing using the details below. We will acknowledge your complaint and provide a response within a reasonable timeframe. If you are not satisfied with our response, you may escalate your complaint to the Office of the Australian Information Commissioner (OAIC).

11. Contact Us

If you have any questions or concerns about this privacy policy or our privacy practices, please contact our Privacy Officer:

- **Privacy Officer:** Brigid Skelton
- **Email:** brigid@spinfinancebrokers.com.au
- **Phone:** 0420 744 887
- **Postal Address:** 5 Snowwood Street, Reedy Creek 4227 QLD

12. Changes to Our Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be posted on this page, and the "Effective Date" at the top of the policy will be updated accordingly. We encourage you to review this policy periodically to stay informed about how we are protecting your information.