

Introduction

This is the privacy policy of National Credit Management Limited (NCML) ABN 85 008 281 123. NCML is a subsidiary of Credit Corp Group ABN 33 092 697 151.

In this policy the terms 'we' and 'us' means NCML. The term 'you' means all individuals, customers, clients and any other person with whom NCML deals.

Our contact details are as follows:

Address:	PO Box 6106, Halifax Street, Adelaide, SA 5000
Phone:	1300 649 161
Fax:	(08) 8125 5660
Email:	privacy@ncml.com.au

Definitions

In this policy, the term 'personal information' has the same meaning as defined within the Privacy Act 1998, which is:

'information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Purpose

The purpose of this policy is to explain how NCML handle and protect your personal information.

Scope

This policy applies to the business and operational activities in which NCML is involved, including, but not limited to, debt collection and recovery activities, process serving, receivables management services and all other associated functions.

The following summarises what information we may hold, how your personal information is collected, and what we use this information for.

Protecting your privacy

We are committed to protecting and maintaining the privacy, accuracy and security of your personal information. We will comply with the Australian Privacy Principles (APPs) in the Privacy Act (Cth) 1988 (Privacy Act), the Privacy Act, and, when applicable, the Credit Reporting Privacy Code (CR Code). Words defined in the Privacy Act, the APPs and the CR Code have the same meaning when used in this policy.

Personal information that we collect and hold

We may collect personal information about you such as:

- your name, current address details, previous address details, and landlord or mortgage details including address and phone number;
- date of birth, gender, and marital status;
- government identifiers such as driver licence number and passport details;
- email address and telephone/mobile numbers;
- financial information (including credit history), bank account and/or credit card details, and personal references;
- current and previous place of employment, position within the current and previous place of employment, employer's address and contact details, previous employer details, and business details (if you are applying as a business); and
- sensitive information about you in relation to insurance products or if you are seeking assistance with financial hardship.

We collect information about your accounts and transactions with us. We may also collect information when you use our websites. Please refer to the Websites section of this policy for further details.

How we collect personal information

We collect personal information in a variety of ways. Mainly we will collect information from you when you knowingly provide it to us by telephone, in person or in documentation such as an application form (which may be an online application). We also collect information when you make a request or enquiry of us.

We may also collect personal information from publicly available sources or third parties, such as a referee provided by you, a credit reporting body or other credit provider, an insurer of your property, or a person selling your debt to us or engaging us to collect the debt.

Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information about individuals when it is necessary for us to carry on our business functions or to comply with laws.

Importantly, in some circumstances if you do not provide the information that we request, we may not be able to provide our services to you or provide them to the same standard.

We may collect, hold, use and disclose your personal information to answer your enquiry and/or provide the information or service that you requested.

We may also collect, hold, use and disclose your personal information:

- to enable us to develop, administer and manage our services and businesses;
- to customise services to better meet your needs and preferences;
- to compile a customer profile about you to serve you better;
- to engage a credit reporting body to conduct a credit and reference check;
- for billing purposes and collection of debts;
- for statistical purposes;
- any other customer support purposes;
- to notify credit providers of a default by you of your agreement with us;
- to advise credit providers of the status of your agreement with us, in circumstances where you are in default with credit providers;
- to deal with complaints;
- to enforce our rights when you are in breach, and
- when authorised or required by law.

When we may disclose your personal information to third parties

In the course of conducting our business we may provide your personal information to:

- related companies of ours;
- credit reporting bodies;
- other credit providers and insurers;
- service providers including mailhouses, printers, call centres, and technology providers;
- government bodies;
- persons who act as your guarantor or who provide security for credit to you;
- debt collectors and assignees of your debts;
- a recognised external dispute resolution scheme of which we are a member; and
- our professional advisors, including our lawyers, auditors and accountants.

We may disclose your personal information to third parties:

- to meet the purpose for which it was submitted;
- if we have your consent to do so or otherwise when we are authorised by law;
- if we are required by law to disclose the information.

Overseas disclosure

We may store or hold personal information about you in electronic storage and networked systems operated by our service providers. Your information stored in this way may be disclosed in countries outside Australia, including the Philippines.

NCML states that all personal information contained within its proprietary collection system is stored and managed locally in Australia. Some Group business systems (such as email) are cloud based and may potentially mean some personal information is stored in an overseas datacentre.

If we disclose information to overseas recipients, we will ensure that the overseas recipient does not breach the Australian Privacy Principles.

Security

All personal information held by us will be handled and stored in accordance with our obligations under the Privacy Act. We will take reasonable steps to:

- make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- protect the information from misuse, interference, loss or unauthorised access, modification or disclosure both physically and through computer security methods; and
- destroy or permanently de-identify the information if it is no longer needed for any purpose.

Websites

When you visit our Website, we or agencies on our behalf and our internet service provider may monitor and make a record of your visit and log the following "clickstream data" for statistical purposes:

- your server's IP address;
- your top level domain name (for example .com, .gov, .au, .uk etc);
- the pages you accessed and any documents downloaded;
- the previous site you have visited and the site you move to;
- the type of browser and operating system you are using; and
- the date and time of your visit.

For example, this information may be used to find out how the Website is used and navigated, including the number of hits, the frequency and duration of visits and most popular session times, so that we may evaluate and improve our Website's performance.

When you are on the Website you could be directed to other sites that are beyond our control. These other sites may send their own cookies to users, collect data or solicit personally identifiable information. This privacy policy is strictly limited to the collection, storage and use of personally identifiable information collected from individuals, customers or clients, in the course of our businesses, and does not apply to any third parties.

We have no control over the privacy practices or the content of any third party websites, and assume no liability for the privacy practices of these websites. You should therefore check the individual privacy policy of any third party when accessing other websites that may be linked to the Website.

How to access and amend personal information

On request from you we will provide details of the personal information we hold about you. The release of information is subject to some exceptions such as information relating to existing or any anticipated legal proceedings, together with exceptions provided by the Privacy Act.

Unless unusual circumstances apply, we should provide access to you within 30 days of the request. We reserve the right to charge a fee for providing access to your information, but only when permitted by law.

To protect your personal information, we will need to verify your identity so that we can be sure we are releasing your personal information to the correct person. All correspondence should be addressed to:

Mail: The Privacy Officer
Add: PO Box 6106 Halifax Street, Adelaide, SA 5000
Fax: (08) 8125 5660
Email: privacy@ncml.com.au

Our objective is to respond to any request within a reasonable timeframe.

Correction of personal information held by us

We aim to keep your personal information on our records accurate, complete and up-to-date.

You have the right to request your personal information be corrected / updated if the information held by us is incorrect, incomplete or not up to date. Amendment of personal information will be conducted upon written or verbal request from you. You can contact us on 1300 649 161 or write to The Privacy Officer to do this.

No fee is charged for lodging a request for correction.

We will respond to your requests for correction as soon as practicably possible, in any event no later than 30 days after receiving your request.

Complaints

We are committed to the protection of your privacy and personal information. NCML maintain a formal complaint handling process in accordance with the principles of the AS/NZS 10002:2014 Quality Standard (Guidelines for complaint management in organisations).

Complaints you may have about your personal information can be lodged with the person you have been dealing with, or by using our contact details in this policy. A copy of the NCML Complaint Handling Policy can be provided upon request.

We will attempt to resolve any complaint within 10 working days. If resolution is not possible within this timeframe we will contact you to discuss the matter further. You also have the right under the Privacy Act to make a complaint to the Information Commissioner.

Changes to this policy

This policy is subject to change over time without prior notice. We may amend this policy by updating the policy and publishing on our websites.

Copies of this policy

You can ask us to provide you with a copy of this policy, including a hard copy, by contacting us using the contact details above.

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