

PRIVACY POLICY

HOW YOUR PERSONAL INFORMATION IS USED AND MANAGED

About this Privacy Policy

Our privacy policy (this policy) sets out how Volt Group companies (each “we”, “us”) manage personal information, including credit-related information, we collect about you. Volt Limited ACN 622 375 722 (Volt) is a Volt Group company.

This policy was prepared in May 2020 has been further updated from time to time. This version was updated as at 31 August 2022.

If you have any feedback on this policy, or you wish to contact us, please email us at help@voltcorp.com.au We look forward to hearing from you.

We may vary this policy from time to time. We will ensure that the most updated version is on our website. We invite you to check the policy on the website from time to time.

WHAT IS PERSONAL INFORMATION AND PERSONAL DATA

Personal information in Australia

In Australia, personal information is information, or an opinion about you or from which you can reasonably be identified.

When we collect and use personal information about you in Australia, we manage that personal information under this privacy policy, the Privacy Act, the Australian Privacy Principles (APPs) in the Act and any APP Code, law or rule we follow.

WHY WE COLLECT OR COLLECTED PERSONAL INFORMATION

We collected personal information about you when we took a record of that personal information. We may collect personal information about you if we take a record of that personal information.

We collect or collected personal information about you only in relation to your interaction with Volt Group. For example, we may have collected personal information about you so we could:

- supply services to you;
- manage our commercial relationship and arrangements with you;
- understand your requirements and develop our products and services;
- offer you our products or other products that may have been of interest to you;
- make products available to you at your request;
- determine your ongoing ability to service any loan; and
- improve the services and products we offered.

If you are a Volt customer, we may collect other personal information about you from dealing with you to help us conduct our activities efficiently.

WHAT PERSONAL INFORMATION DO OR DID WE COLLECT

We or our service providers may collect or may have collected personal information about you including:

- identification information like your name, date of birth, address and contact details;
- information you gave us when you:
 - enquired about our products or services;
 - applied to obtain other products or services;
 - used our website;
- information we collected from supplying products or services to you;
- information we collected when you used our website like:
 - your IP address;
 - the user ID of logged in users; and
 - the username of login attempts;
- financial information like your income and expense particulars and your transaction data from other financial institutions when we considered credit applications by you or offers to guarantee credit obligations owed by others to us; and
- credit information like details about your credit history, credit capacity and credit worthiness.

How long do we keep personal information

We keep information while you are a customer with us and for only as long as we need it.

Generally, we will keep your information for 7 years but sometimes we need to keep it for longer such as:

- if the law requires us to keep it for longer;
- to respond to any complaints

HOW WE COLLECT PERSONAL INFORMATION

Personal information you provide

Mostly, we collect personal information about you directly from you. We may collect personal information about you from other sources, like when:

- you use our website;
- if you applied for a loan from us, when we obtained a credit report about you to consider your loan application; or
- we accessed your transaction data from other financial service providers to assess both initially and on an ongoing basis whether you could afford a loan from us.

Personal information provided by others

Sometimes, we collected personal information about you that was available publicly or from others who:

- acted for you, like your mortgage broker or another person who referred you to us;
- checked information you gave us, like confirming your income with your employer if you applied for a loan from us;
- supplied services (like identity verification or loan settlement services) to us;
- gave us information that helped us to decide whether to make a product or service available to you (like credit reporting agencies and other credit and financial service providers) and whether you could continue to meet your repayment obligations; or
- helped us manage our arrangements with you.

Cookies

We use cookies to personalise content and ads to make our website and our apps more appealing or easier for you to use. We also share cookie information with third parties to assist us to direct advertising to you and to analyse data relating to use of our website and our apps.

For more information on how we use cookies and tracking tags, please visit our Cookie Preference Centre on our website by clicking on the Cookie Settings (on the consent banner) and reviewing your cookie settings in there. If you would like more information about cookies in general, please visit [Cookiepedia](#).

HOW WE PROTECT PERSONAL INFORMATION

Securing your personal information is important to us

We will take steps reasonably available to us to protect your personal information from:

- misuse, interference or loss; and
- unauthorised access, modification or disclosure.

We will do this by ensuring that access to your personal information is password protected and available only to those of our employees that need to use, disclose or manage it under this policy.

Personal information that we can't protect is personal information that you share with us on our social media channels such as email addresses and first and last names.

What happens when there is a data breach

If, despite our best efforts, a data breach occurs, we will take immediate steps to determine the breach, its cause and how to fix it.

We will advise you of the extent of the data breach (if known) and the most appropriate means of regaining control of that information. We will also notify the Office of the Australian Information Commissioner (OAIC) or any other regulator, if appropriate and comply with all other relevant legal requirements.

HOW WE USED PERSONAL INFORMATION

We may have used personal information about you to:

- consider any requests or applications you made to us or to our service partners;
- help us to understand your requirements;
- assess your ongoing ability to repay any loans; and
- refine and develop our products and services.

We may also have used your personal information to tell you about our products and services or products and services from our service partners that may have been available to you. That may have included telling you about promotional events in which we invited you to participate. That correspondence is called direct marketing.

We no longer undertake direct marketing.

We may also have used personal information about you to:

- identify you and manage our arrangements with you;

- prevent or investigate conduct that could have been fraudulent or criminal; and
- assist with any other purpose to which you consented.

HOW OUR SERVICE PROVIDERS COLLECTED AND USED PERSONAL INFORMATION

Our service providers may have collected information about your use of our website, products or services that helped us to:

- engage with you efficiently;
- improve and promote the products and services we offered;
- guard against fraud;
- check for malicious activity; and
- protect you and our websites from specific kinds of attacks.

HOW AND WHEN WE USE CREDIT INFORMATION

If you:

- applied for, or had, a loan from us; or
- offered to guarantee or guarantee obligations owed by others to us,

we may have exchanged personal information about you with credit reporting bodies.

Information that we obtained or exchanged about you may include:

- identification information such as your name, date of birth, address and driver's licence number;
- consumer credit liability information such as credit providers who gave you credit, the types of credit and the maximum amounts of credit available under those arrangements;
- the history of whether you made loan repayments and when repayments were made;
- requests that were made for access to the credit file the credit reporting body held about you;
- the types of credit for which you have applied;
- ongoing credit bureau scores;
- when you were at least 60 days overdue on a payment and when you have made those payments or entered into new payment arrangements;
- court judgments relating to you and credit you obtained;
- information about arrangements with creditors and whether you are bankrupt;
- publicly available information about your credit worthiness; and
- whether, in a credit provider's opinion, you committed a serious credit infringement such as:

- obtaining or seeking to obtain credit fraudulently; or
- acting in a way that led your credit provider to believe you no longer wished to comply with your credit obligations and your credit provider was unable to contact you.

We may have used information we got about you from a financial institution or credit reporting body or information we derived from that information to assess your application for credit from us or to assess your ongoing ability to repay a loan or to invite you to apply for another product or service from us.

HOW WE USED GOVERNMENT IDENTIFIERS

Only as permitted by Law

We do not use Government related identifiers (such as tax file numbers or Medicare card numbers) to identify you in our records. We may collect and use some of your Government related identifiers, but only for reasons required and permitted by the Privacy Act, the Australian Privacy Principles (APPs) in the Act or any APP Code, law or rule we follow. For example, we may have used those identifiers to help us to check your identity before we made products available to you or for tax reasons.

WHEN WE DISCLOSE PERSONAL INFORMATION

Who we share your personal information with

We may have exchanged personal information about you with:

- other companies in the Volt Group. We may continue to exchange personal information about you to other companies in the Volt Group;
- credit reporting bodies, if you applied for, guaranteed or obtained a loan or any other credit product from us;
- any guarantors or possible guarantor of your obligations to us;
- suppliers that helped us to conduct our business. Amongst other suppliers, that may have included suppliers that helped us to:
 - understand your requirements;
 - improve our products or services;
 - verify your identity;
 - settle loans we made available;
 - provide services to help us run our business;
 - take appropriate action about suspected unlawful activity or serious misconduct; or
 - take loan recovery action. We may continue to exchange personal information about you to suppliers that assist us to take loan recovery action on behalf of lenders.

Those suppliers may:

- disclose your personal information to contractors that assist those suppliers to perform services for us; or
- track your use of our products, services or website for us.

What we use your personal information for

Our arrangements with suppliers will limit use of your personal information to the services they supply to us. We will ask suppliers to in turn ensure their arrangements with contractors limit those contractors' use of your personal information to help the suppliers perform services for us.

We will require suppliers or their subcontractors to return, destroy or de-identify personal information about you that they hold when they cease performing services for us. If you want information on how those suppliers manage your personal information, please email us at help@voltcorp.com.au

Suppliers we may have shared personal information with include:

- your employer to verify employment related information you gave us;
- other financial institutions you deal with;
- mortgage brokers that introduced you to us and any mortgage aggregator that supplies services to your mortgage brokers;
- any person who referred you to us to obtain services from us;
- regulators or law enforcement bodies;
- dispute resolution bodies or services, to assist with resolving any complaint you make about our products or services or any dispute you may have with us;
- any entity that proposes to take an interest in our business or any of our loans or other assets; and
- any person at your request or with your consent.

Yes, we use Google Analytics

We used Google Analytics services to improve and analyse our website and app experiences.

We may have shared information with Google for that purpose. When you use our website, that information may include the URL of the webpage that you've visited and your IP address. Google may also [set cookies on your browser](#) or read cookies that are already there.

Google used the information Volt shared with them to help us understand how you engage with the Volt's website. Also, Google may use that information for other purposes. Please read Google's Privacy Policy (<https://policies.google.com/privacy>) to learn more about how Google uses and processes data.

You can turn Google Analytics off

If you don't want Google Analytics to be used in your browser, you can [install the Google Analytics browser add-on](https://tools.google.com/dlpage/gaoptout)(<https://tools.google.com/dlpage/gaoptout>).

Also, please read Google's [Privacy Policy](https://policies.google.com/privacy) (<https://policies.google.com/privacy>) to learn more about how Google uses and processes data.

Fraud detection

To assist us with fraud detection, we collected behavioural data (e.g. data about how you use your device while using the app (behavioural) and location data. This assisted us to detect potential fraudulent activity, and to verify if you were undertaking activity on your account. We used that information only for the purpose of protecting your security, unless you consented for us to use the information for other purposes.

In most circumstances, fraud detection information is destroyed after 2 years unless we need to keep it for another purpose relating to dealing with you. We take reasonable measures to ensure that your information is secure.

DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS

We will store information in Australia whenever possible.

If there is a need to store information overseas (for example, if a service is not available in Australia) we may disclose personal information about you to overseas entities that assist us to conduct our business. It may be necessary for those overseas entities to disclose your personal information under foreign law.

Some of the entities we disclosed personal information to are situated in the USA, Switzerland, India, Ireland and the Philippines. There may be other overseas jurisdictions, we cannot identify now, in which those overseas entities may in turn hold your personal information. If those entities need to host your personal information overseas we tokenised or hashed or took other steps to protect the security of that personal information for better data protection.

We are responsible for any failures by overseas entities to manage your personal information in accordance with the APPs.

WHAT THE LAW REQUIRES US TO DO

We collected and used personal information when required by law

We may have collected personal information about you because the law required us to do so. For example, the law required us to collect personal information about you to:

- identify you under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) before we opened an account for you or made a loan to you; and
- decide whether a loan would be suitable for you under the National Consumer Credit Protection Act 2009 (Cth).

WHAT IF:

We receive unsolicited personal information

If we receive personal information about you that we did not request, we will consider whether we need that information for our functions and activities. If not, we will destroy that information or ensure it does not identify you.

You do not give us your personal information?

If we do not collect personal information about you, we may not be able to manage our relationship with you, like dealing with a complaint you make to us.

You want to deal with us anonymously

You may be able to use our website to find out information about us by using a pseudonym or without identifying yourself.

However, insofar that you wish to engage with us about products or services we may have supplied to you, we will need to identify you.

You give us information about other people

If you tell us personal information about another person, we ask that you:

- tell that other person that you have done so; and
- invite that person to contact us to obtain a notice from us about how we manage their personal information.

HOW TO ACCESS YOUR PERSONAL INFORMATION

Asking for access to personal information

You can ask for access to personal information we hold about you anytime. We may ask you to detail the information you require if you want only some of that personal information.

If you want to access the personal information we hold about you, please email us at help@voltcorp.com.au.

You may also want to access personal information (including credit-related personal information) we have disclosed about you to third parties or to make a complaint to those third parties. The privacy policies of those third parties will tell you how you can make an access request or a complaint to them.

What information we can and cannot share

Generally, we will give you access to the information you request. There may be some circumstances, permitted by the APPs, in which we will not give you that access. For example, we may not give you access to information where:

- giving access would have an unreasonable impact on the privacy of others;
- we reasonably believe the request is frivolous or vexatious;
- the information relates to actual or possible legal proceedings between us and you and we would not have to produce that information under orders a court may make in those proceedings;
- giving access would prejudice our interests relating to negotiations we are having with you or investigations we are making into unlawful activity or misconduct of a serious nature;
- the law or a court or tribunal order prevent us from giving you access; or
- giving access would reveal certain information we generate internally relating to a commercially sensitive decision-making process.

We will give you written reasons if we refuse to give you access to personal information you request, unless there are reasonable grounds (such as confidentiality obligations we owe) for not giving you those reasons. In any case, we will give you an explanation if we do not give you access to information because of a commercially sensitive decision-making process.

How we will respond to requests for personal information

We will give you access to the information you request in the manner you request (for example, by email), if we are reasonably able to do so. If we are not able to do so or if we have a reason for not giving you access to all the information you request, we will try and work with you to give you access to personal information we hold about you in a way that meets your needs and our needs.

We will respond to any request you make for access to personal information we hold about you within a reasonable time after you make the request. The time it takes will depend on the amount of information you seek and whether we have to make more enquiries of you to clarify your request. We expect to respond to any request you make for access within 30 days after we receive your request.

Is there a cost to accessing personal information?

Depending on the amount of information you request, we may charge you a fee for organising the information you request from us. We will give you an estimate of the fee before we organise the information. Then, we can work with you to check whether you wish to limit your request to reduce the charges.

HOW PERSONAL INFORMATION IS KEPT UP-TO-DATE

Correcting your personal information

We take steps, reasonably available to us, to ensure that the personal information we hold about you is accurate, up-to-date and complete. To assist us, we ask that you contact us and update the personal details we hold about you (for example, your name, address and contact details), if those details change. You can contact us by email to help@voltcorp.com.au

You may consider that the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading. You can request us to correct the personal information we hold about you by email to help@voltcorp.com.au

If we receive your request to correct information but consider that the information does not need correcting, we will give you a written notice setting out our reasons. Also, we will give you details of how you can:

- ask us to associate a statement to the information you consider to be incorrect; or
- make a complaint about us refusing to correct information.

We will respond to any correction request you make within a reasonable time after you make the request.

We will not charge you for correcting or associating a statement to personal information at your request.

HOW TO MAKE A COMPLAINT

If you have a complaint start with us, but there are other ways

If you have a complaint about the way we manage the personal information we hold about you, please email us at help@voltcorp.com.au.

If we cannot resolve your complaint in a manner that is satisfactory to you and within 30 days of receiving your complaint, we will tell you how you can take your complaint to the external dispute resolution scheme of which we are a member or the Office of the Australian Information Commissioner (OAIC).

We are a member of the Australian Financial Complaints Authority (AFCA). You can lodge a complaint with AFCA by visiting the AFCA website at www.afca.org.au.

You can make a complaint to the OAIC by using the privacy complaint form available at www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint and submitting it online, by post, fax or email.

It is free to make a complaint to us, AFCA or the OAIC.