

1.1. INTRODUCTION AND OBJECTIVE OF PRIVACY POLICY

IQumulate Premium Funding (“IQumulate”) is a 100% wholly owned subsidiary of Steadfast Group Limited ABN 98 073 659 677 (“Steadfast”).

Steadfast privacy policy <https://www.steadfast.com.au/privacy-policy> sets out how they collect, store, use and disclose your personal information (including sensitive information) in accordance with the terms below, and applicable Privacy Laws (defined as laws including the Australian Privacy Principles set out in the [Privacy Act 1988 \(Cth\)](#) or in New Zealand, [Privacy Act 2020](#)), or in Singapore, the [Personal Data Protection Act 2012](#), or in the EU, the General Data Protection Regulation (GDPR) (EU) 2016/679.

Steadfast privacy policy provides an overarching framework for IQumulate, and is consistent with the abovementioned laws.

In this Privacy Policy, ‘IQUMULATE’, ‘we’, ‘us’, and ‘our’ means IQumulate Premium Funding Pty Ltd ABN 82 127 517 677 and IQumulate Funding Services Limited NZ Company No. 7366116.

IQUMULATE takes its obligations to collect, use, protect and disclose personal information seriously. This Privacy Policy sets out how we collect, store, use and disclose your personal information (including sensitive information) in accordance with the terms below, and applicable Privacy Laws (defined as laws including the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) and in New Zealand where the Privacy Act 2020 came into force on 1 December 2020, replacing the Privacy Act 1993.

IQumulate is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth), and the New Zealand Privacy Principles contained in the Privacy Act 2020. Both principles govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au.

A copy of the New Zealand Privacy Principles may be obtained from the website of the Privacy Commissioner at www.privacy.org.nz

1.2. WHAT IS PERSONAL INFORMATION?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, from media and publications, from other publicly available sources and from third parties. We don’t guarantee website links or policy of authorised third parties.

1.3 PERSONAL INFORMATION WE COLLECT

Credit application information:

We collect information from our customers, prospective customers, brokers, introducers, service providers and the people who represent the businesses we deal with. The type of personal information we collect and hold may vary depending on the nature of our interactions with you. For example, IQumulate would collect and hold financial information, credit-related information, identification information, transaction / repayment history information, banking details and employment information about you.

In order to satisfy our legal obligations, we may need to retain your information after a transaction or a relationship has ended. However, we will not retain your identifiable personal information longer than is reasonably necessary and permitted.

Employment information:

We collect personal information from people who submit applications or register interest for employment with IQumulate. We may also collect personal information from potential contractors and consultants. Once submitted, we will use your personal information for the following purposes:

- to assess and administer your application for employment in accordance with our standard recruitment practices, including conducting psychometric testing and reference checks
- to assess and administer your application for engagement as a contractor or consultant
- to communicate with you in relation to your application
- to monitor and review our staff sourcing practices

If your application is unsuccessful, we may retain your information on file in case a more appropriate opportunity becomes available. You are free to contact us if you do not wish for us to retain your information. If your application is successful, we may use your information for various purposes including the administration, supervision and management of your employment or engagement and the support and development of IQumulate's business activities.

For more information please refer to our Use of Personal Information Policy.

1.4. PURPOSE OF USING YOUR PERSONAL INFORMATION

As a premium funding provider, a major purpose for which we hold, use or disclose personal information is to assess credit applications, manage credit (servicing and collections activity), hardship applications, insurance agreements and claims, for planning, product and service development, research purposes and to analyse the risk profiles of our customers or potential customers.

We collect, hold, use and disclose your personal information in order to manage and administer the products and / or services we provide, whether they are individuals or businesses. You may be a customer, contractor, partner or party with whom we do or have done business, or may do business with in the future.

In addition, we also collect, hold, use and disclose credit information and credit eligibility information about you for purposes reasonably necessary for our business activities and consistently with the requirements in both Privacy Principles as permitted by law. These purposes include but aren't limited to:

- assessing credit applications;
- internal management purposes, including risk management, credit scoring and portfolio analysis;
- to assist in the collection of overdue payments;
- help prevent defaults and deal with financial hardship;
- to participate in the credit reporting system;
- undertake securitisation activities and debt assignments;
- to deal with complaints and legal proceedings;
- to meet our legal and regulatory requirements (such as reporting matters to regulators or enforcement bodies when authorised or required by law);
- organisations who purchase our debt and to whom we assign our debt to; and
- organisations wishing to acquire an interest in any part of our business (including its receivables) for assessing or implementing any such acquisition.

In addition, the handling of Personal Information serves certain business purposes of IQumulate, for example:

- to fulfil contracts IQumulate clients, e.g. the publication of contact details of a staff member as the contact person for the client; or
- to submit proposals to potential IQumulate clients, e.g. the initiation of contracts; or
- to promote IQumulate.

Restrictions apply under both Privacy Principles in relation to the circumstances and purposes for which such information may be used or disclosed and we comply with these restrictions. For example, in general, credit eligibility information may not be disclosed unless the recipient is a credit provider and restrictions apply on the use of credit eligibility information for direct marketing.

1.5. HOW WE COLLECT YOUR PERSONAL INFORMATION

Wherever it is possible and practical to do so, we will collect personal information directly from you, this may be in person, over the telephone, by email, over the internet, by e-mail or fax, or by completion of a form (such as an application form).

We may also collect your personal information from a third party including an insurance broker or a third party with whom we have an arrangement, partnership or joint venture with. The type of third party who might provide information to us will vary depending on the nature of the business and interaction with you. For example, we may collect credit information and credit eligibility information from a credit reporting body for the purpose of a hardship application or insurance claim.

When we provide credit, third parties could include:

- a credit reporting body;
- a trade credit insurance provider;

While this is not an exhaustive list, we may obtain your personal information from other third parties which could include:

- an introducer such as a broker or agent;
- someone authorised to act on your behalf (e.g. financial advisor, executor, administrator, trustee, guardian, attorney, accountant or consumer advocate);
- research agencies;
- third party service providers and / or suppliers; or
- one or more of our related companies, in Australia, New Zealand or overseas.

For statistical purposes, we collect information on website activity such as the number of users who visit our websites, the date and time of visits, the number of pages viewed, navigation patterns, what country and what systems users have used to access the site and, when entering one of our websites from another website, the address of that website. This information is obtained through the use of 'cookies' (refer below for more information about 'cookies').

Our websites may also contain links to other websites. While these links are provided for convenience, if you are navigating these sites please be aware that the information handling practices of the linked websites may differ from ours. While we try to link only to sites that share our high standards and respect for privacy, we are not able to guarantee the privacy practices of other websites

1.6. DEALING WITH PERSONAL INFORMATION

We understand the importance of protecting the personal information we hold about you. We take steps to ensure your personal information is free from misuse, interference, loss, unauthorised access or modification by:

- securing personal information both in electronic form;
- enforcing a clean desk policy within all physical offices;
- staff education around the importance of Privacy and Data Security;
- protecting our systems with appropriate technology solutions.

1.7. WHY WE COLLECT PERSONAL INFORMATION

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

1.8. RECORDING FURTHER INFORMATION COLLECTED

We will record the information collected and where applicable, obtain further information to avoid any ambiguities, inconsistencies and irregularities. All relevant inquiries raised, information collected, and amendments made will be undertaken by us with the strictest confidence.

1.9. SENSITIVE INFORMATION

Sensitive information is defined in both Privacy Principles to include information or opinion about such things as an financial information about public companies that is yet available in public domain, individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained;
- For a secondary purpose that is directly related to the primary purpose;
- With your consent; or where required or authorised by law.

To protect our client's interest, privacy, confidentiality and discretion, we will execute a Non-Disclosure Agreement

1.10. DISCLOSURE OF YOUR PERSONAL INFORMATION

Personal Information may also be disclosed to:

- legal and other professional advisors engaged by IQumulate;
- retirement, superannuation or pension plan administrators and related advisors;
- external service providers such as insurers and / or brokers;
- clients or potential clients of IQumulate, in any location in connection with the operation of IQumulate's business. These entities may be located in another jurisdiction, and Personal Information may be transferred to other jurisdictions with different data protection laws.

In order to provide our products and services to our customers, from time to time, we share personal information with our related bodies in both Australia and New Zealand.

In the case of disclosure to third parties, those entities will be under obligations to keep Personal Information secure and confidential and IQumulate will take reasonable steps to ensure compliance with those obligations

Your Personal Information may be disclosed in a number of circumstances including the following:

- third parties where you consent to the use or disclosure;
- where required or authorised by law;
- disclosure is necessary to avoid endangering someone's health and safety.

1.11. THIRD PARTIES

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

When a third party submits an application online, the information collected is compared with the details we may already have stored, this might include your name and address.

We use third parties/suppliers/vendors for design work / stand building type work only. No customer information is divulged or shared. If we share company information with a third party as part of them designing a communication piece for example, we would seek a Non-Disclosure Agreement to be executed prior to the commencement of any work.

1.12 SHARING OF PERSONAL INFORMATION

We may also share personal information to other businesses who provide services to us and other third parties including:

- introducers such as insurers and / or brokers;
- other organisations as required or authorised by law, for example, government or regulatory bodies;
- credit reporting bodies;
- organisations through whom you choose to make payments to us;
- organisation involved in our funding arrangements such as investors, advisers, trustees and rating agencies;
- organisations who purchase our debt and to whom we assign our debt to.

We require these businesses and our suppliers to comply with strict confidentiality requirements and the Privacy Act.

If you are our customer (or a representative of a customer) there is additional information about how we deal with personal information in the product's Important Privacy Notice. You may request at any time your Important Privacy Notice by contacting us, using the details in the 'Contact Us' table at the end of this policy.

1.13. DISCLOSING INFORMATION OVERSEAS

As is the case throughout the Australian & New Zealand Financial Services Industry (and other major industries), technology allows for services to be provided by different service providers including some that are located overseas.

We utilise overseas service providers for some of our activities and to do so may need to disclose personal information to those service providers. We may also disclose such information to other overseas recipients for the purposes listed above when permitted to do so by the Privacy Act.

While we try to store your Personal Information locally, there may be times where our service providers are located outside of Australia & New Zealand. Where this happens, we always take proper steps to secure and protect your personal information, wherever its being stored.

Further, we may share your personal information with overseas recipients in accordance with this Policy. Whilst it is not practicable to list every country in which such overseas recipients are likely to be located, it is likely that the countries to which your personal and credit information may be disclosed include New Zealand and the Philippines (Manilla).

1.14. SECURITY OF YOUR PERSONAL INFORMATION

Compliance with the requirement to secure personal information in Australia Privacy Principles 11 (“APP 11”) and New Zealand Privacy Principles 5 (“NZPP 5”) is key to minimising the risk of a data breach. APP 11 requires entities to take reasonable steps to protect the personal information they hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. The type of steps that are reasonable to protect information will depend on the circumstances of the entity and the risks associated with personal information handled by the entity.

1.14.1 NATIONAL DATA BREACH SCHEME

The primary purpose of the NDB scheme is to ensure individuals are notified if their personal information is involved in a data breach that is likely to result in serious harm. This has a practical function: once notified about a data breach, individuals can take steps to reduce their risk of harm. For example, an individual can change passwords to compromised online accounts, and be alert to identity fraud or scams. The NDB scheme in Part IIIC of the Privacy Act requires entities to notify affected individuals and the Commissioner of OAIC of certain data breaches.

IQumulate has adequate controls in place to mitigate any data leakages and to ensure compliance with the scheme.

1.14.2 PAYMENT CARD INDUSTRY DATA SECURITY STANDARD

Payment Card Industry Data Security Standard (“PCI DSS”) is also relevant if an entity such as IQumulate collect and store credit card information through their website. The PCI DSS is a central standard, which governs the safe storage of credit card details, and acts as a means to limit fraud. The standard is not contained in the law in Australia, nor in other countries. However, credit card providers, like Visa and Mastercard, enforce compliance through their contracts.

IQumulate has the controls to ensure that it adheres to the standard, and presently operates at a Tier 3 level. A compliance certificate confirming Tier 3 will be conferred on 26th April 2021.

1.15. MAINTAINING QUALITY OF YOUR PERSONAL INFORMATION

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

1.16. DESTRUCTION OF PERSONAL INFORMATION

Under the Australian & New Zealand Privacy Principles:

- We are required to take reasonable steps to protect the information we hold from misuse and loss and from unauthorised access, modification or disclosure.
- We are required to take reasonable steps to destroy or permanently de-identify personal information if we are no longer needed.
- These principles apply to personal information regardless of when it was collected.

1.17. MARKETING

1.17.1 DIRECT MARKETING

Personal Information may also be used or disclosed to advise you of products and services that may be of interest to you by means of direct marketing.

If you do not want your personal information to be used for direct marketing purposes, please contact us so that we can action this request. This is referred to as "opting out" of direct marketing. You can "opt-out" of direct marketing using the details in the 'Contact Us' table at the end of the policy.

eDataMailing (eDM) are sent from our internal IQUMULATE Update email address. An excel spreadsheet of broker names, brokerage and email address is produced and sent as a bulk email to all required brokers. This is sent as a bcc to their emails so others cannot view them).

1.17.2 ADVERTISEMENTS

From time to time, we place advertisements on other websites. This may involve installing a cookie on a computer when our advertisement is viewed. This simply allows us to keep track of how many unique visitors we have to our site and from what advertisements they entered.

This then allows us to measure the effectiveness of different advertisements. The privacy policies of the websites which install the cookies should provide additional information about the use of cookies.

To evaluate the effectiveness of our website advertising, we may use third parties to collect statistical data. No personal data is collected on these occasions

Some web traffic information is disclosed to Google Analytics when you visit our website. You can opt out of the collection of information via Google Analytics "opt out" browser add on.

We use features known as social plug-ins for social network such as LinkedIn. These are buttons such as the LinkedIn "Like" button

For networking events for brokers, we only collect the broker's name, phone number, email address and dietary requirements for networking events organized. The same information is obtained if the brokers request partners' attendance. We do not request any information such as date of birth, home address as it is not relevant to the event.

1.18. CREDIT RELATED INFORMATION

As part of obtaining credit with us, we may obtain credit-related information about you from credit reporting bodies. Credit-related information in this Policy includes:

- credit information of the kinds relating primarily to your dealings with other credit providers (such as about credit applications you have made or credit that you hold with other credit providers). This information will typically have been provided by other credit providers or other third parties; and

- credit eligibility information about you that credit reporting bodies derive from the information above, such as credit scores, risk ratings and other evaluations about you;

1.18.1. CREDIT REPORTING BODIES (“CRB”)

We access and disclose credit information to the following credit reporting bodies:

Equifax Australia

Website: www.equifax.com.au

Postal address: PO Box 964, North Sydney, NSW 2059

Creditor Watch

Website: www.creditorwatch.com.au

Postal address: GPO Box 276, Sydney, NSW, 2001

These credit reporting bodies are each required to have a policy which explains how they will manage your Credit Reporting Information. If you would like to read the policies of these credit reporting bodies please visit their websites and follow the "Privacy" links, or you can contact them directly for further information.

1.18.2. COLLECTION, USE AND DISCLOSURE TO CRB

We may also disclose your credit information relating to your dealings with us to credit reporting bodies. Those credit reporting bodies may include that information in reports that they provide to other credit providers to assist them to assess your credit worthiness.

For example, we will provide information that identifies you and about your application for credit when obtaining credit reporting information for the purposes of assessing that application. Should you fail to meet your payment obligations to us or commit a serious credit infringement in relation to credit provided by us, we may be entitled to disclose this information to credit reporting bodies.

1.18.3. VICTIM OF FRAUD

You also have the right to request credit reporting bodies not to use or disclose your credit reporting information if you believe that you have been, or are likely to be, the victim of fraud (for example, you suspect someone is using your identity details to apply for credit). You must contact the credit reporting bodies directly should this be the case.

1.19. ACCESS AND CORRECTION OF PERSONAL INFORMATION

You are entitled to access the information we hold about you. Simple requests are best handled by contacting us directly:

IQumulate Premium Funding Pty Ltd (Australia)

Website: www.iqumulate.com

Postal Address: Suite 2, Level 25, 259 George Street, NSW, 2000

More complex requests such as accessing the Credit Information we hold about you or obtaining copies of contractual or insurance policy documents may be better detailed in writing to ensure we fully understand and can respond accurately to your request. The 'Contact Us' table at the end of this policy contains details of the ways you can contact us.

We will usually provide the information requested within 30 days of receiving your request. If there is a reason we are unable to agree to a request for access to your Personal Information we will advise you of this in writing.

Some examples of why we may refuse a request for access include, where providing the information:

- may pose a threat to the health or safety of an individual or the public;
- may have an unreasonable impact on the privacy of another individual;
- is not allowed by law; or
- may reveal internal information relating to a commercially sensitive decision-making process.

If your request relates to an insurance product, we comply with the General Insurance Code of Practice and Life Insurance Code of Practice timeframes.

There is no charge to request access to your standard personal information, however, we may apply a reasonable administration fee for providing access to more complex information in accordance with your request.

IQumulate aims to take all reasonable steps to ensure that Personal Information is accurate. An individual may ask for corrections if they feel information is inaccurate, outdated or incomplete.

In addition, there will be some scenarios in which IQumulate will have no alternative but to process Personal Information in order to perform its legal obligations and its contractual obligations to you.