

## Safe Business Finance Pty Ltd - Privacy Consent Notice

By signing this consent form you consent to us, Safe Business Finance Pty Ltd (ACN 131 891 015), our related corporations and authorised agents collecting, using, holding and disclosing to others your personal information (which includes credit-related information) about you.

In addition to our Privacy Policy, this Privacy Consent Notice explains how we manage your personal information.

We are authorised to provide credit to you.

We may collect, use, hold and disclose, as applicable, personal information (which includes credit-related information and credit eligibility information) for the purposes of assessing an application for credit by you, arranging or providing credit to you, acting as a referrer of your business to others, managing credit provided, providing you with products and services, direct marketing to you, managing our relationship with you, and running our business.

As we only provide commercial credit, the provisions of Part IIIA of the Privacy Act 1988 (Cth) do not apply to us, except where you are an individual and we obtain consumer credit liability information (as defined in the Privacy Act) about you from a credit reporting body or you are an individual who is a guarantor or proposed guarantor.

### 1. What Information may we collect?

We may collect personal information about you which includes credit-related information, credit eligibility information and with your consent, sensitive information.

#### Personal information includes:

- identifying information, such as your name, address, date of birth and other contact details;
- information about your financial position, such as your income, expenses, savings, assets and any (other) credit arrangements;
- your employment details or income details where self-employed;
- your tax file number;
- other details such as the ages and number of your dependants and cohabitants, the length of time you have lived at your current or previous address,
- your reasons for applying for a product or service; and
- other information we consider relevant to the services you ask us to provide to you.
- where you have provided bank statement access, records of your financial transactions obtained via our authorised data provider, together with insights, flags and questions generated by automated analysis of those transactions for credit assessment purposes.

#### Credit information includes:

- details of credit applied for, and details of the type and amount of credit granted;
- the fact that credit provided to you has been repaid;
- whether or not you have made payments on time;
- default information, that is, payments overdue for at least 60 days and for which collection action has started;
- information about your credit worthiness;
- details of any new arrangements made with you;
- court proceedings and personal insolvency information; and
- if applicable, our opinion that you have committed a serious credit infringement.

We may be required to collect personal information from you to comply with relevant laws and regulations, such as Anti Money Laundering legislation and applicable tax laws.

Credit Eligibility Information refers to credit-related information received by us from a credit reporting body and includes credit reporting information.

Credit-Related Information means credit-related information and credit eligibility information.

Credit Reporting Body refers to an agency that holds credit-related information relating to individuals and businesses.

Sensitive Information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health records.

## **2. Use of your personal information for direct marketing purposes**

We may use personal information collected from you in order to tell you about other products and services offered by us or by our business partners. You can let us know at any time if you wish to no longer receive direct marketing materials from us.

## **3. Personal information about third parties**

When you make application for credit from us, we will ask you to provide us with personal information about other persons, such as referees and family members whom we may contact. These persons are referred to as “third parties”. When you provide this information to us you warrant that you are authorised to do so.

We may, at any time while we are providing services to you, contact those persons to assist us in helping you honour your contractual obligations under any arrangement you have with us.

When you provide us with personal information about third parties, you agree to inform each such person about who we are, how to contact us, how to obtain our Privacy Policy, and that we will use and disclose their personal information for the purposes set out in this Privacy Consent Notice.

## **4. Contacting third parties and use of social media**

We may, at any time while we are a credit provider to you, contact third parties to assist us in helping you honour your contractual obligations under any credit contract you have with us.

You also authorise us to use social media to contact you.

In circumstances where you have failed to honour your obligations to us and we are unable to contact you by other means after making reasonable efforts, you authorise us to make contact with:

- persons listed by you as your contacts, connections and friends on social media sites where you are a user, including third parties, and
  - your landlord, employer, accountant, referees, spouse/partner and any other person listed or referred to in your application for credit,
- so we can establish contact with you for the purpose of assisting you to honour your contractual obligations to us.

## **5. What happens if you are unable to provide us with your personal information**

If you are unable to provide us with personal information requested, we may be unable to:

- provide you with any credit applied for;
- refer you to other credit providers;
- manage or administer any credit facility provided;
- verify your identity to protect you from fraud; or
- tell you about other products or services that may be of interest or benefit to you.

## 6. Disclosing, obtaining and exchanging personal information

In addition to our rights to contact third parties as set out in paragraph 4, you agree that we may disclose, obtain and exchange personal information about you with:

- corporations which are related to us;
- credit reporting bodies (outlined below);
- third-party service providers engaged by us to operate our business, as described in section 6A below;
- Illion Australia Pty Ltd or other similar service provider, which provides us with your bank transaction data where you have authorised that provision, for the purpose of credit assessment and, where a loan has been granted and your account is in arrears or we are assessing a financial hardship arrangement, to obtain updated transaction data to assist in managing your account;
- insurers and re-insurers, where insurance is provided in connection with our services to you;
- debt collecting agencies, if you have not repaid a loan as required;
- any industry body, tribunal, or court or otherwise in connection with any complaint regarding the services we provide to you;
- our professional advisors, such as accountants, lawyers and auditors;
- other credit providers and their professional advisors;
- other brokers, credit assistants, intermediaries and aggregators, where applicable;
- your employer;
- your accountant (where you are self-employed);
- your landlord or landlord's agent where you rent the premises in which you reside;
- the vendor of any goods you intend to purchase using any credit applied for;
- your representative, where authorised by you; or
- government and regulatory authorities, if required or authorised by law.

With your consent we may also disclose your personal information to our referral partners. Our referral partners may offer services such as loans, debt management, credit repair, budgeting and rental services. You acknowledge that our referral partners may offer you a product that is not the exact same type of product or amount that you originally applied for from us.

### 6A. Third-party service providers

We engage third-party service providers to support our business operations, which may include providers of cloud infrastructure, data hosting, productivity and communications platforms, marketing and customer engagement services, website analytics, advertising platforms, and technology development services. We exercise care in selecting service providers and only engage providers where: (a) a formal commercial agreement is in place; (b) that agreement includes obligations requiring the provider to protect personal information consistently with the Australian Privacy Principles; and (c) the provider does not use personal information submitted by us for purposes beyond those agreed, including for the development or training of AI models. We do not use free or publicly available platforms, consumer AI tools, or services where your personal information would be processed without a governing commercial and data processing agreement in place.

Some of these service providers may be located outside Australia. Details of our overseas disclosures are set out in section 13.

In addition to the above general category, we specifically identify the following providers given the nature of the personal information they receive:

AI-assisted credit assessment — Anthropic PBC (United States): We use an artificial intelligence API to analyse your bank transaction data as part of our credit assessment process. Only transaction information, descriptions and amounts are transmitted — your name, date of birth or address are not included. Anthropic's privacy policy is at [www.anthropic.com/privacy](http://www.anthropic.com/privacy).

AI-assisted staff communications — Anthropic PBC and OpenAI LLC (both United States): Our staff may use AI writing assistance tools to help draft communications to you, including responses to enquiries and complaints. Staff are required to use the minimum personal information necessary for this purpose. OpenAI's privacy policy is at [www.openai.com/privacy](http://www.openai.com/privacy).

## **7. Related Corporations**

As indicated above, we may disclose your personal information to corporations which are related to us, including Safe Finance Pty Ltd (ACN 098 751 930), Safe Debt Management Pty Ltd (ACN 010 183 294), and Safe Financial Group Pty Ltd (ACN 138 086 852).

We may disclose your personal information to our related corporations to assist us and them in providing the products or services you request. Our related corporations may use, retain and disclose your personal information in accordance with their respective Privacy Policies.

## **8. Credit reporting bodies**

A credit reporting body collects credit-information about individuals, which is then provided as a report to credit providers and others in the credit industry to assist in managing credit risk, providing credit, collecting debts and other activities.

If you apply for credit, we generally will apply for a credit report from a credit reporting body and they will disclose to us, our related corporations and authorised agents, personal information about your credit worthiness.

We may also disclose personal information about you to a credit reporting body. The credit reporting bodies with whom we currently deal are:

- Equifax — [www.equifax.com.au](http://www.equifax.com.au)
- Equifax New Zealand — [www.equifax.co.nz](http://www.equifax.co.nz)
- Experian — [www.experian.com.au](http://www.experian.com.au)

You may find out about how each credit reporting body manages credit-related personal information by viewing their Privacy Policy on their website.

## **9. Notifiable matters**

When you make an application for consumer credit we are required, under the credit reporting code (which forms part of the Privacy Act), to ensure that you are aware of certain specific matters:

- A credit reporting body may include credit information in reports provided to us to assist in assessing your credit worthiness;
- If you fail to meet your payment obligations or commit a serious credit infringement, we may disclose this to a credit reporting body, which may affect your ability to obtain credit in the future;
- You have a right to access your personal information held by us, to request correction, and to make a complaint;
- You have the right to request that a credit reporting body does not use your information for credit pre-screening; and
- You have the right to ask a credit reporting body not to use or disclose your personal information if you believe you have been or are likely to be a victim of fraud.

## **10. Disclosure of Consumer Credit information**

Where you are an individual, you expressly consent to us obtaining consumer credit information about you from a credit reporting body for a commercial credit related purpose and to that credit reporting body disclosing such information.

## **11. Guarantors**

We, our related corporations and authorised agents may give a guarantor, or a person who is considering becoming a guarantor, credit information about you for the purpose of enabling that person to decide whether to act as guarantor or to keep the guarantor informed about the guarantee. You expressly consent to us disclosing credit information about you to a prospective guarantor for a credit guarantee purpose.

In interpreting these provisions, the expression “you” includes any guarantor or proposed guarantor referred to in an application for credit.

## **12. Who holds your Personal Information?**

We, our related corporations and our authorised agents hold your personal information. We take reasonable steps to ensure that your personal information held by us is protected from misuse, interference, loss, unauthorised access, and disclosure or modification.

We disclose certain personal information to overseas service providers as described in sections 6A and 13. We take reasonable steps to ensure those providers handle your information in a manner consistent with the Australian Privacy Principles.

## **13. Overseas disclosures — summary**

We disclose personal information to overseas service providers in connection with our business operations. These providers are most commonly located in the United States of America, Europe, and New Zealand. All overseas providers are engaged under formal commercial agreements that include obligations to protect your personal information.

Where a provider is located in a jurisdiction without privacy protections formally comparable to Australia, we rely on contractual protections and the provider’s published data handling commitments as the basis for the disclosure, consistent with APP 8.

Offshore dedicated software development team: We engage a dedicated offshore software development team to build and maintain our technology systems. Depending on their role, team members may access our systems and data including personal information for development, testing, maintenance and support purposes, subject to confidentiality obligations, role-based access controls, and data handling requirements consistent with the Australian Privacy Principles.

## **14. Automated processing and AI-assisted assessment**

We use automated tools, including artificial intelligence systems, to assist in the assessment of credit applications. AI-assisted analysis of your bank transaction data may be used at any stage of the assessment process, including:

- within our online application form, where questions generated by AI analysis may be presented to you for you to answer;
- following submission of your application, where AI-generated questions or requests for information may be sent to you via our CRM system or by an assessor; and
- during assessor review of your application, where AI tools may assist our staff in identifying matters requiring clarification.

All AI-generated outputs are reviewed by a human credit assessor. No credit decision is made based solely on AI-generated outputs.

AI-assisted assessment is a standard part of our credit assessment process. We do not offer a manual assessment pathway that excludes automated analysis of bank transaction data. Applicants who do not wish their bank transaction data to be analysed using automated tools should not proceed with an application.

Only transaction descriptions and amounts are sent to AI service providers for analysis. Your name, date of birth and address are not included in data sent to AI providers.

## **15. Gaining access to your Personal Information**

You can gain access to the personal information we hold about you by contacting our Privacy Officer:

Address: PO Box 6840, GCMC Qld 9726

Email: [admin@safefinancial.com.au](mailto:admin@safefinancial.com.au) (marked to the attention of the Privacy Officer)

Members Portal: <https://members.safefinancial.com.au/auth/login>

You can request our Privacy Officer arrange to correct any personal information we hold about you which you believe is incorrect.

