Privacy Policy

Safe Group of Companies

Safe Group of Companies — Privacy Policy

The policy covers Safe Finance Pty Ltd (ACN 098 751 930), holder of Australian Credit Licence Number 391958, Safe Debt Management Pty Ltd (ACN 010 183 294), holder of Australian Credit Licence Number 531560, and its related companies (the “Safe Group of Companies”). Some of the companies within the Safe Group of Companies are credit providers, while others are credit assistants, finance brokers, debt management service providers or general providers of finance-related products or services. We provide a list of the current members of the Safe Group of Companies later in this Privacy Policy (the “Policy”).

This policy outlines how members of the Safe Group of Companies deal with your *personal information* (including *credit-related information*) as well as their legal obligations and rights in relation to that information.

This policy includes our credit reporting policy, meaning it covers additional information on how we manage your *personal information* collected in connection with an application for credit. We refer to this type of *personal information* below as *credit-related information*.

1. Our commitment to protect your privacy

We understand how important it is to protect your *personal information*. This document sets out our commitment in respect of the *personal information* we hold about you and what we do with that information.

Any *personal information* we collect about you will only be used for the purposes we have collected it for or as allowed under applicable law, including the Privacy Act 1988 (Cth) (the “Privacy Act”).

Where applicable, we abide by the Australian Privacy Principles for the protection of *personal information*, as set out in the Privacy Act and comply with the Credit Reporting Code made under that Act (the “Credit Reporting Code”).

2. Why we collect your Personal Information

We collect *personal information* from you for the purposes of dealing with you and to assist us in arranging for the products and services you request to be provided to you. We may also collect your *personal information* for the purposes of direct marketing and managing our relationship with you. This may also entail collecting *credit-related information* when you decide to apply for credit.

3. What Information may we collect?

The type of information that we collect from you will depend on which products and services you choose to enquire about.

We may collect *personal information* (which includes *credit-related information*), *credit eligibility information* and with your consent, *sensitive information*. The meaning of these expressions is explained below.

Personal Information means information from which your identity is reasonably apparent and includes *credit-related information* and *credit eligibility information*. Examples are:

- identifying information, like your name, address, date of birth and other contact details;
- information about your financial position, like your income, expenses, savings, assets and any (other) credit arrangements;
- your employment details;
- your tax file number;

- your reasons and objectives for applying for a product or service and, where required, other details such as the ages and number of your dependants and cohabitants, the length of time you have lived at your current address, and
- any other information we consider relevant to the assessment of your application and in the case of an application for credit for submission to a lender.
- where you have provided bank statement access, records of your financial transactions obtained from your bank or financial institution, together with insights and questions generated by automated analysis of those transactions as described in section 5A of this Policy.

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, being payments overdue for at least 60 days and for which collection action has started;
- information about your creditworthiness;
- details of any new arrangements made with you,
- court proceedings and person insolvency information, and
- if applicable, our opinion is that you have committed a serious credit infringement.

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.

Credit Reporting Information means *credit-related information* provided by a *credit reporting body*.

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 records, or health records.

4. How do we collect your Personal Information?

Where possible, we will collect your *personal information* from you, but we may also collect *personal information* about you from credit reporting bodies and other people such as your creditors, financial institutions, other persons whom you have or have had dealings with, including referees, employers, landlords, accountants, lawyers, financial advisers, and financial counsellors. We may also collect *personal information* about you from lead providers and other organisations where you have provided your consent to them passing on your *personal information* to us. All telephone calls to and from us are recorded and we take your consent to us recording a telephone call as your consent to us recording all future calls unless you advise us to the contrary.

Where you apply for credit or other product or service that we provide and provide access to your bank transaction data through our authorised data provider, illion Australia Pty Ltd or other similar service provider, we will collect records of your financial transactions from your nominated bank accounts. You will be notified of and asked to consent to this collection before it takes place. During any period in which you hold an account with us and your account is in default or we have reason to believe you may be experiencing financial hardship, we may use the illion service to obtain updated transaction data to assist us in managing your account and assessing appropriate hardship arrangements.

5. How do we use your Personal Information?

We may use your *personal information* (including *credit-related information*) for the purposes of considering any application made by you for products or services offered by us, including credit, providing you with products and services, acting as a referrer of your business to others, managing our relationship with you and running our business. We may also use your *personal information* for other purposes where required or permitted by law.

Where you have provided bank transaction data as part of an application, we may use automated tools, including artificial intelligence systems, to analyse that data for the purpose of identifying matters relevant to our assessment. This process is described in detail in section 5A of this Policy.

5A. Automated processing and AI-assisted credit assessment

We use automated tools, including artificial intelligence systems, to assist in the assessment of 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 assessor. No decision is made based solely on AI-generated outputs.

AI-assisted assessment is a standard part of our 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.

6. Use of your Personal Information for Direct Marketing Purposes

We may also use *personal information* for direct marketing to tell you about other products and services offered by us or by our business partners. We may also provide your details to other organisations for specific marketing purposes.

We will consider that you consent to this use, unless you indicate to us that you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes.

If the direct marketing is via email, you may also use the unsubscribe function in the email you receive. If the direct marketing is via SMS, you may reply “stop” and we will remove you from this list.

7. Personal Information About Third Parties

When you apply to us or for the provision of any product or service, 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.

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 policy.

When you apply for credit, we may contact the referees you have listed to confirm their contact details are current and that they are willing to be contacted by us in the future if we are unable for any reason to reach you. Any later contact with your referees will be limited to the circumstances as described in section 8.

8. Contacting third parties if we cannot reach you

If your account with us is overdue and we have been unable to contact you after making reasonable efforts using the contact details you have provided to us (ie: phone, SMS, email and post), you authorise us to contact:

- the referees you listed in your application — solely to pass on a message asking you to contact us;
- your employer, solely to confirm whether you are still employed there; and
- your landlord or your landlord’s agent, solely to confirm whether you still live at the address we hold for you.

We will only contact your employer or landlord as a later step, generally after we have sent you a formal written notice about your overdue account (for example, a notice that your overdue payments may be disclosed to a credit reporting body) and you have remained uncontactable. We will not discuss your loan, your account, or your financial position with any referee, employer or landlord — these contacts are limited to passing on a request for you to contact us, or confirming your employment or residential status, so that we can maintain current and accurate records and re-establish contact with you.

9. Disclosing, Obtaining and Exchanging Personal Information

In addition to our rights to contact third parties as set out in paragraph 8, you agree that we may disclose, obtain and exchange *personal information* about you with:

- prospective lenders;
- corporations which are related to us;
- credit reporting bodies (explained below);
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses, research consultants, and technology service providers engaged to provide software development, system maintenance, data processing, or AI-assisted assessment services (including AI service providers as described in section 5A);
- illion Australia Pty Ltd, which provides us with your bank transaction data where you have authorised that provision, including for the purpose of assessing your application and, where a product or service has been granted, for the purpose of obtaining updated transaction data where your account is in default or we are assessing a financial hardship arrangement;
- Anthropic PBC (United States of America), an AI service provider that analyses your bank transaction data for assessment purposes as described in section 5A — transaction descriptions and amounts only, no identifying information;

- 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 and intermediaries;
- your landlord or landlord's agent where you rent the premises in which you reside (solely to confirm your residential status, as described in section 8);
- your specified referee/s (solely to pass on a message asking you to contact us as described in section 8);
- your employer (solely to confirm your employment status, as described in section 8);
- 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 (in which case we will forward details of your application and supporting information and documentation to them). 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.

Where your application for credit is declined or cancelled, we may disclose limited identifying information to our referral partner Lead Market to enable a referral offer to be generated, as described in, and subject to the consent given under, our Privacy Consent Notice. Lead Market may not use that information unless you accept the referral and must delete it if you do not.

10. Current members of the Safe Group of Companies

As indicated above, we may disclose your *personal information* to organisations which are part of the Safe Group of Companies to assist us and them in providing the products or services you request. The current members of the Safe Group of Companies include Safe Finance Pty Ltd (ACN 098 751 930), Safe Business Finance Pty Ltd (ACN 131 891 015), Safe Debt Management Pty Ltd (ACN 010 183 294), and Safe Financial Group Pty Ltd (ACN 138 086 852).

11. Security of your Personal Information and Disclosures Overseas

We take reasonable steps to ensure that your *personal information* held by us is protected from misuse, interference, loss, unauthorised access, disclosure or modification.

We disclose certain personal information to service providers located outside Australia. We take reasonable steps to ensure those providers handle your information in a manner consistent with the Australian Privacy Principles. Full details of our overseas disclosures are set out in section 11A of this Policy.

11A. Overseas disclosures — details

This section describes each category of overseas disclosure of personal information made by the Safe Group of Companies.

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 8Offshore dedicated software development team

We engage a dedicated offshore software development team to build and maintain our technology systems, including our loan management platform, online application systems, and other business-critical infrastructure. Team members are engaged as dedicated resources and operate under our direct supervision and management.

The level of access to our systems and data held by individual team members varies depending on their role and the requirements of their work. Depending on their function, team members may have access to system infrastructure, application code, databases, and in some cases production data, for the purpose of performing development, testing, integration, maintenance, debugging, and support activities.

Access to personal information and customer data by offshore team members is subject to: (a) confidentiality and data protection obligations consistent with the Australian Privacy Principles; (b) role-based access controls limiting access to what is necessary for the relevant function; (c) security requirements including access logging, multi-factor authentication where applicable, and data handling protocols; and (d) our oversight and direction as to how data is accessed and used. We take reasonable steps to ensure that offshore team members handle any personal information they access in a manner consistent with this Privacy Policy and applicable Australian privacy law.

We do not identify the specific country or countries in which our offshore development team is located in this Policy, as those arrangements may change from time to time. If you wish to obtain further information about the location or arrangements applicable to our offshore development team, you may contact our Privacy Officer using the contact details at the end of this Policy.

12. Credit Reporting Bodies

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

If you apply for credit, credit assistance or other product or service that we provide, 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*, including that you have applied for credit or credit assistance, repayment history information, credit liability information and that you are in default under a credit arrangement or have committed a serious credit infringement if that is the case.

The credit reporting bodies we currently deal with are:

- Equifax, whose privacy policy is at www.equifax.com.au;
- Equifax New Zealand, whose privacy policy is at www.equifax.co.nz;
- Experian, whose privacy policy is at www.experian.com.au.

You can view each *credit reporting body's* privacy policy on its website to learn how it manages credit-related information.

We may seek and use commercial *credit-related information* about you to assess an application for consumer credit or commercial credit (as defined in the Privacy Act).

13. Credit pre-screening

Credit reporting bodies offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called “credit pre-screening”. You have the right to request that a *credit reporting body* does not use your information for this purpose. To opt out of credit pre-screening, contact the *credit reporting body*, using the contact details on their websites noted above.

14. Notifiable matters

In circumstances where you have made 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. Details of these matters can be viewed on our website at www.safefinancial.com.au and are also set out in the privacy consent notice we will ask you to agree to at the time you apply for consumer credit.

15. Updating your Personal Information

We take reasonable steps to ensure that the *personal information* we collect, use or disclose is accurate, complete and up to date. It is important to us that the *personal information* we hold about you is accurate and up to date. If you wish to make any changes to your *personal information*, please contact us.

16. Access and correction to your Personal Information and Credit Information

We will provide you with access to the *personal information* we hold about you on request. We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request you make we may respond to your request immediately. Otherwise, we will endeavour to respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your *personal information*, for example, if the information relates to existing or anticipated legal proceedings or if your request is vexatious.

If you are an individual, an explanation will be provided to you if we deny you access to the *personal information* we hold about you.

You can gain access to the *personal information* held about you by contacting our Privacy Officer whose contact details are set out at the end of this Policy.

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

17. What happens when we no longer need your personal information?

We take steps to ensure that we keep your *personal information* for as long as we require it for one or more of the purposes described in this policy. We’re required by law to retain some information for certain periods of time, such as under the Corporations Act and the Anti-Money Laundering & Counter-Terrorism Financing Act. When we no longer require your *personal information*, we take reasonable steps to ensure that your *personal information* is dealt with in accordance with our internal “Data Retention Policy” which includes provision for your *personal information* to be destroyed, de-identified or rendered inaccessible where required or appropriate.

AI-generated outputs, including question sets generated from bank transaction analysis and responses provided by applicants to those questions, form part of the assessment record for the relevant application. These records are retained and disposed of in accordance with our Data Retention Policy and our obligations under the National Consumer Credit Protection Act 2009 and applicable ASIC regulatory guidance. Such records may be produced in response to a request or complaint by a regulatory body, external dispute resolution scheme, or court.

18. Notifiable Data Breaches

Under the Notifiable Data Breaches Scheme ("NDB Scheme") we are required to notify you and the Office of the Australian Information Commissioner ("OAIC") of certain data breaches and recommend steps you can take to limit the impacts of a breach (for example, a password change).

The NDB Scheme requires us to notify affected individuals about a data breach that is likely to result in serious harm. However, there are exceptions such as, where we have already taken appropriate remedial action that removes the risk of serious harm.

If we believe there has been a data breach that impacts your *personal information* and creates a likely risk of serious harm, we will notify you and the OAIC as soon as practicable and keep in close contact with you about the nature of the breach, the steps we are taking and what you can do to reduce the impacts to your privacy.

If you believe that any *personal information,* we hold about you has been impacted by a data breach, you can contact us using the contact details set out at the end of this Policy.

19. Privacy and our Website

When you deal with us via our website, we collect additional *personal information* about you.

(a) Public Pages

Anytime you access an unsecured part of our website, that is, a public page which does not require you to log on, we will collect information about your visit, such as: the time and date of the visit; any information or documentation that you download; your browser type; and internet protocol details of the device used to access the site.

(b) Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. We use cookies for security, personalisation, and analytics purposes. You may change the settings on your browser to reject cookies; however, doing so might prevent you from accessing our website's secured pages.

(c) Email

When we receive emails, we will retain the content and our response to you where we consider it necessary. We may add your email address to our mailing lists.

(d) Third Party Websites

Our website may contain links to third party websites. The terms of this policy do not apply to external websites. If you wish to find out how third parties handle your *personal information*, you must obtain a copy of their privacy policy.

20. Changes to our Privacy Policy

We may change this policy from time to time (without notice to you) to suit our business requirements or comply with applicable laws. You may obtain a copy of our current policy at www.safefinancial.com.au or request one by contacting us.

21. Complaints and Questions

If you have any questions, concerns or complaints about this policy, our handling of your *personal information*, or you believe there has been a breach by us of the Privacy Act or the credit reporting provisions of the Privacy (Credit Reporting) Code, please contact our Privacy Officer specified below.

Once a question or complaint has been lodged, our Privacy Officer will respond to you as soon as possible. We will aim to deal with any complaints at the source of your complaint.

If you are not satisfied with the response you receive, please let us know so we can investigate further and respond to you.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints:

Australian Financial Complaints Authority

Website: www.afca.org.au | Email: info@afca.org.au | Phone: 1800 931 678 | Post: GPO Box 3 Melbourne VIC 3001

Federal Privacy Commissioner (OAIC)

Website: www.oaic.gov.au | Phone: 1300 363 992 | Post: GPO Box 5218 Sydney NSW 2001

Our Privacy Officer's contact details:

Email: admin@safefinancial.com.au (marked for the attention of the Privacy Officer)

Post: PO Box 6840, GCMC QLD 9726

Members login: https://members.safefinancial.com.au/

This Privacy Policy is current as of 16 July 2026.