

PRIVACY POLICY

Reliance Recoveries Pty Ltd

ABN 77 162 140 150

Your Privacy is important to us

The Company has adopted a Privacy Policy to ensure that we respect the confidentiality of information and the privacy of individuals. We are bound by the Australian Privacy Principles (APPs) contained in the The Privacy Act 1988 ("the Act) and the Privacy Amendment (Enhancing Privacy Protection) Bill 2012 ("Reform Bill"), which are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is managed.

Personal Information

A variety of personal information that may be collected and held includes information about:

- Clients/Customers/Prospective Customers
- Debtors
- Suppliers/Agents/Process Servers/Sheriffs
- Solicitors/Accountants/Financial Counsellors
- Job Applicants/Employees
- Competitors
- Other people who may come into contact with our company

This information may be gathered from telephone enquiries, internet enquiries, forms completed by such individuals, letters, face-to-face meetings, telephone conversations or where required a third party (e.g. references).

Personal information about Clients/Customers/Prospective Customers

The Company collects, holds and uses personal information about individuals, sole traders, partnerships, and firms that are customers of The Company and of the directors and employees of the corporations that are customers of the Company. This information includes names, addresses, telephone numbers, and any other information required such as financial information about a director (where the director is guaranteeing trading debts), sole trader, partnerships or firms. This information is gathered for the purpose of:

- Establishing a point of contact for the supply of services and pricing information, invoicing, collection of outstanding accounts, the promotion of new and updated products and services



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- Assessing the credit worthiness of a proposed client/customer or director providing personal guarantee

Personal information about Debtors

The Company collects, holds and uses personal information about Debtors. This information includes names, addresses, email addresses, telephone numbers, employment, known associates, emergency contacts, and financial information. Some information is collected via internet searches however most of the information collected is supplied by the creditor. Certain other information is collected from the debtor and third parties but supply of that information is on a voluntary basis.

Personal information about Suppliers/Agents/Process Servers/Sheriffs

The Company collects, holds and uses personal information about Suppliers, Solicitors, Agents, and Process Servers and in the case of corporations, we collect personal information about the directors and employees. This includes names, addresses, email addresses, telephone numbers and any other relevant information needed to establish a point of contact for the purchase of product and services and any related enquiries.

Personal information about Solicitors/Accountants/Financial Counsellors

The Company collects, holds and uses personal information about Solicitors, Accountants and Financial Counsellors. The information gathered includes names, addresses, email addresses, telephone numbers and any other relevant information needed to establish a point of contact when dealing with them as agent of a debtor. The Company may also gather from time to time, personal information and other relevant information to establish a point of contact for the purchase of product and services and any other related enquiries.

Personal information about Job Applicants/Employees

The Company collects, holds and uses personal information about employees and prospective employees. This includes a job applicant's name, address, career history and other information relevant to their application for employment. From time to time a job applicant may be requested to provide *sensitive information* such as a medical report. Supply of this information will be on a voluntary basis however non-supply of information requested may impede the processing of their application for employment. A successful applicant will become an employee and once an employment relationship is formed between an individual and The Company, the records The Company holds relating to those individuals pre-employment checks become exempt. If no employment relationship is formed The Company will destroy all records relating to that individual within three (3) months of the position being filled unless the applicant authorises otherwise.



Personal information about Competitors

The Company collects, holds and uses personal information about its Competitors, which includes the directors and employees of such organisations. The information gathered includes names, addresses, telephone numbers and other information relevant to assisting The Company in maintaining its competitiveness in the market place.

Personal information about others

The Company collects, holds and uses personal information about other people who may come into contact with The Company. This information gathered will be used for the primary purpose or related secondary purpose for which it has been provided.

Sources of Information

Sources of information regarding Clients/Customers/Prospective Customers

The Company usually obtains personal information regarding Clients, Customers and Prospective clients (or their directors or employees) directly from the Client, Customer, Prospective clients, their director and/or employee. Where clients are applying for a credit account, information may be sourced from credit reference agencies, trade references, and the land titles office. If a client decides not to provide The Company with the required personal information then The Company may not be able to consider dealing with that party. From time to time information may come from a Third Party as in the case of a referral.

Sources of information regarding Debtors

The Company usually obtains personal information regarding Debtors from the creditor. From time to time information may come from the Debtor, Credit Reporting Agencies, or a Third Party as in when an alternate contact number or new address is supplied, and in some cases from information gathered from the internet. Information supplied by a third party is always on a voluntary basis.

Sources of information regarding Suppliers/Agents/Process Servers/Sheriffs

The Company usually obtains personal information regarding Suppliers, Agents, Process Servers and Sheriffs from the individual concerned or from the organisation by which they are employed. From time to time information may come from a Third Party as in the case of a referral.

Sources of information regarding Solicitors/Accountants/Financial Counsellors

The Company usually obtains personal information regarding Solicitors, Agents, Process Servers and Sheriffs from the individual concerned or from the organisation by which they are employed. From time to



time information may come from a Third Party as in the case of notification of representation by a debtor or a referral.

Sources of information regarding Job Applicants/Employees

The Company usually obtains personal information regarding Job Applicants and Employees either from the applicant or employee or from an employment agency who collects this information on The Company's behalf or from authorised references provided by the applicant. All information supplied by the applicant is on a voluntary basis, however any information withheld which may be needed to assess the suitability of the applicant could prevent The Company from being able to consider dealing with that party.

Sources of information regarding Competitors

The Company usually obtains personal information regarding Competitors from the individual concerned or from the organisation by which they are employed. From time to time information may come from a Third Party as in a previous client when discussing their service needs.

Sources of information regarding others

The Company usually obtains personal information regarding other people who may come into contact with The Company from the individual concerned or from the organisation by which they are employed.

Sensitive Information

Some personal information The Company collects is "sensitive". Sensitive information includes a person's racial or ethnic origin, religion, membership of political bodies or trade unions, criminal records, state of health and medical history. Sensitive information such as medical history and criminal records may be relevant to applications by prospective employees and while consent will be sought before this is obtained, we may not be able to adequately assess the suitability of applicants for some positions without this information.

The APPs require that sensitive information is used and disclosed only for the primary purpose for which it was provided, or a directly related secondary purpose, unless the individual agrees otherwise or for other specific reasons such as if the use of disclosure of this information is required by law (for example to prevent a serious crime or injury). Any documents asking for sensitive information will explain this.

Use and Disclosure of Information

To operate our business effectively we need to understand and meet the needs of our clients and prospective clients. We also need to understand and to a different degree meet the needs of our client's debtors if we are going to be sensible in our approach.



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The Company uses personal information for the following purposes:

- To provide products and services that have been requested
- To improve our products and services which includes analysing future customer needs
- To communicate with people with whom we need to provide our services
- To assess debts and debtors to assist in the recovery process
- To assess the suitability of prospective clients, job applicants and suppliers
- To provide ongoing information about our products and services to people we believe may be interested
- To comply with legal obligations
- Recruitment of employees and contractors

The Company may outsource to other organisations the recruitment of employees. For this aim, an individual's information may, as required, be transferred to or handled by an employment agent. The Company may at times outsource certain other functions to other organisations. For this aim, personal information regarding clients, suppliers and others, depending on the circumstances, personal information may be disclosed to:

- Other divisions or organisations within the Reliance Group
- Credit Reporting Agencies
- The Company's Legal Advisers
- Business Support Services such as Document Storage Facilities and Printers
- Market Research Companies contracted by The Company to undertake Customer Surveys
- Companies contracted to conduct and manage Promotional Campaigns on behalf of The Company
- Agencies involved in providing Training
- Service Providers and Specialist Advisers who have been contracted to provide administrative, financial, research or other services
- Other Insurers, Credit Providers, Courts, Tribunals and Regulatory Authorities as agreed or authorised by law



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- Anyone authorised by an individual, as specified by that individual or the contract

The Company imposes a requirement of organisations which handle or obtain personal information as service providers to The Company, to acknowledge the confidentiality of the information provided, to give an undertaking to respect any individual's right to privacy and to comply with the APPs and this Policy. The Company also imposes a requirement that these organisations use this information only for the purpose for which it was supplied.

Management and Security of Information

The Company has an APP Compliance Officer who oversees the management of personal information in accordance with this policy, the APPs, the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Bill 2012 (Reform Bill).

The Company regards any breach of privacy as an extremely serious matter. All employees who handle personal information are familiarised with the APPs and undertake training to ensure that privacy and confidentiality are respected. As part of all our employment contracts, employees must read and sign an acknowledgement that they have read and understood The Company's Privacy Policy and understand their personal obligations and requirements under The Privacy Act 1988.

Mercantile Agents must ensure that extra care is taken when dealing with personal information. Mercantile Agents are governed and overseen by several regulatory bodies and should be aware that breaches of privacy carry severe penalties for both the company and the individual found guilty of having breached an individual's privacy.

The privacy of personal information is important to us, whether the information is gathered through personal contact, by telephone, mail, over the internet or other electronic media. The Company holds personal information in a combination of secure computer storage facilities and paper based files and other records and take steps to protect personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

The Company has provisions in place to ensure that personal information is stored no longer than necessary. Where there is no further requirement for personal information to be held that personal information will be destroyed or have details which may identify individuals removed.

Data Quality

The Company endeavours to ensure that personal information it collects, uses or discloses is accurate, complete and up to date. Information changes frequently with changes of address and other personal



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circumstances, so The Company encourages individuals to contact us as soon as possible, when there are changes to personal information, in order that any personal information held can be updated.

Anonymity and Pseudonymity

The Company advises that wherever lawful and practicable, individuals will have the option of not identifying themselves or of using a pseudonym when entering transactions with The Company, however individuals must bear in mind that in most cases it will not be practicable for The Company to provide goods and services without obtaining the relevant customer identification.

Access and Correction

The APPs allow provision for individuals to have the right to obtain a copy of or have access to any personal information which The Company holds, and to have corrected any perceived inaccuracies.

Some exceptions exist whereby providing the information or access to the information could prove detrimental to the health and safety of an individual or may result in the breach of privacy of other individuals.

Some circumstances in which the exceptions may apply are where:

- Providing the information or access to the information could pose a serious and imminent threat to a life or health of any individual
- Providing the information or access to the information could have an unreasonable impact upon the privacy of other individuals
- The Request for access is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings between the organisation and the individual, and the information would not be accessible by the process of discovery in those proceedings
- Providing access would reveal the intentions of the organisation in relation to negotiations with the individual in such a way as to prejudice those negotiations
- Providing access would be unlawful
- Denying access is required or authorised under law



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- Providing access would be likely to prejudice or hinder any investigations or prosecutions being carried out by and enforcement body
- An enforcement body performing a lawful security function asks the organisation not to provide access to information for reasons of upholding national security

Should any person(s) wish to, obtain a copy of, or have access to, the personal information held with this organisation, they can do so at any time, by making the request in writing to the Privacy Officer (details following). The person(s) making request for a copy of or access to their personal information should be aware the request for a copy of, or access to, their personal information held is free of charge.

Overseas Recipients

As at the date of publication The Company does not disclose any personal information to overseas recipients, however they may in the future disclose personal information to overseas call centres and administration teams, such access to personal information will be kept to a minimum requirement for the express purpose of conducting the business. The countries likely to be involved in this process are India and the Philippines.

E-Commerce

The Company will not attempt to identify users of the Company's website. The Company will only use information provided to it via its e-commerce site for the primary purpose or related secondary purpose for which it has been provided. Individual's email addresses will be recorded if supplied by the individual or with the consent of the individual, or if the individual sends The Company a message, or if supplied by a third party for means of contact (as in the case of a creditor supplying an email address for a debtor whereby the debtor has supplied the email address to that organisation for means of contact). An individual's email address will only be used for the primary purpose or related secondary purpose for which it has been provided. Information gathered via e-commerce will not be added to a mailing list or used for any other purpose without the individual's consent.

How to Contact Us or Privacy Concerns

Should you have any queries in relation to any privacy issues of any other matter please contact us by email, telephone, facsimile or post:

Attention: Donna Smith (Director)

E-mail: dsmith@relrec.com.au



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LAW COURTS VIC 3001

Policy Updates

The Company will review the Privacy Policy from time to time to take account of the latest laws and technology, changes in operations, practices and business environment. If you are unsure whether you are reading the most current version please contact us.



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