



Bluestone Mortgages Australia

## Privacy Policy

We understand how important it is to protect your personal information. This document explains how your personal information will be treated as you access and interact with this website.

Our commitment in respect of protecting your privacy is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act 1988 (Cth) and any other relevant law. In compliance with the Credit Reporting Code of Conduct that is issued under the Privacy Act, this document also contains a statement of 'notifiable matters'. This is further explained below.

We have a comprehensive privacy policy in place to ensure that we manage personal information in an open and transparent way. We review our privacy policy periodically and we will amend our privacy policy as the need arises, such as to reflect emerging legislative and technological developments, industry practice and market expectations. This website privacy statement is also reviewed periodically and will be amended as need be.

### **WHO IS BLUESTONE GROUP PTY LIMITED?**

Bluestone Group Pty Limited ACN 091 201 357 is a leading portfolio and capital management business. This website privacy statement applies to this website, which is operated on behalf of Bluestone Group Pty Limited and its related bodies corporate (we, us and our). You can contact us by telephoning (02) 8115 5000 or 13 BLUE or by writing to us at PO Box 1136, QVB Post Shop, NSW, 1230.

## **LINKS TO OTHER WEBSITESLINKS TO OTHER WEBSITES**

This website may contain links to other websites (Third Party Websites) owned or operated by third party providers. We do not operate or control these websites and we are not responsible for their privacy practices. We encourage you to read and understand the privacy policies of any website that collects personal information.

If you access a Third Party Website through our website and if that Third Party Website collects information about you, we may also collect or have access to that information as part of our arrangements with the third party provider.

Where you access a Third Party Website from our website, cookie information ('cookies' are explained below), information about your preferences or other information you have provided about yourself may be shared between us and the third party provider.

## **PERSONAL INFORMATION**

When we refer to personal information, we mean information or an opinion from which your identity is apparent or can reasonably be ascertained. The personal information we hold about you may also include credit information.

Credit information is a sub-set of personal information and is information which is used to assess your eligibility to be provided with finance. It may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies (CRBs).

### **About credit information and 'notifiable matters'**

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information. You may request to have these notifiable matters (and our privacy policy) provided to you in an alternative form, such as a hard copy.

We exchange your credit information with CRBs. We use the credit information that we exchange with the

CRBs to assess your creditworthiness, assess your application for finance and manage your finance. If you fail to meet your payment obligations in relation to any finance that we have provided or arranged, or you have committed a serious credit infringement, we may disclose this information to a CRB.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. We explain how you can do this below.

Sometimes, your credit information will be used by CRBs for 'pre-screening' credit offers on the request of other credit providers. You can contact the CRB at any time to request that your credit information is not used in this way.

You may contact the CRB to advise them that you believe that you may have been a victim of fraud. For 21 days after the CRB receives your notification, the CRB must not use or disclose that credit information. You can contact any of the following CRBs for more information: Dun & Bradstreet (Australia) Pty Ltd ([www.dnb.com.au](http://www.dnb.com.au)), Experian ([www.experian.com.au](http://www.experian.com.au)) and Veda Advantage Ltd ([www.veda.com.au](http://www.veda.com.au)).

## COLLECTION AND USE OF PERSONAL INFORMATION

We may collect personal information from you directly, via your use of our services, or from other business referrers which is reasonable necessary for, or directly related to, our functions or activities, including assessing and obtaining approval for loans. From time to time we may offer other products and services – please see 'direct marketing' below.

## TO WHOM WILL WE DISCLOSE YOUR PERSONAL INFORMATION?

To enable us to maintain a successful business relationship with you, we may disclose your personal information with other entities that provide products or services used by us. The types of entities to which we are likely to disclose information about you include lenders, valuers, insurers, referrers, accountants, CRBs, lawyers, outsource providers and printers. We may also disclose your personal information to any other entities that may have or are considering having an interest in your loan or in our business.

Sometimes we are required or authorised by law to disclose your personal information. Circumstances in which we may disclose your personal information include pursuant to subpoena or to a government agency such as tax authorities.

Some of the entities we referred to here may be located overseas, including the United Kingdom, Ireland, United States and New Zealand. While these entities will often be subject to confidentiality or privacy obligations, they may not always follow the particular requirements of Australian privacy laws. Please see our privacy policy (available upon request) for more information.

## **SENSITIVE INFORMATION**

Sensitive information is any information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

## **COLLECTION AND USE OF SENSITIVE INFORMATION**

We may seek and collect sensitive information about you but only if that sensitive information relates directly to our ability to arrange or provide credit to you or manage the credit provided to you (including, for example, assessing hardship applications and collecting overdue payments).

## **UNSOLICITED INFORMATION**

Sometimes people share information (including sensitive information) with us we have not sought out. This could be through using our website or, for example, requesting us to assess a hardship application. If we receive unsolicited personal information (including sensitive information) about you, we will determine whether we would have been permitted to collect that information. If yes, then we will handle this information the same way we do with other information that we seek from you. If no, and the information is not contained in a Commonwealth record, then we will destroy or de-identify it as soon as practicable, but only if it is lawful and reasonable to do so. Often, it is not possible for us to neatly unbundle this information then destroy or de-identify only certain sections or parts of it, and we may need to store this information for future use, such as to help resolve disputes between us or assess future applications by you. We have many security safeguards in place to protect the information from interference, misuse, loss, unauthorised access, modification or disclosure. This is explained below as well as in our privacy policy.

## **DIRECT MARKETING**

From time to time we may use your personal information for direct marketing purposes, for example, to provide you with current information about mortgage loans, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with.

If you do not wish to receive direct marketing communications from us or from other organisations, you may at any time decline to receive such communications by contacting us. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

We will not use or disclose sensitive information about you for direct marketing purposes unless you have consented to that kind of use or disclosure.

## COOKIES

A 'cookie' is a small text file placed on your computer by a webpage server that may later be retrieved by webpage servers. We use cookies on our website to provide you with a better website experience.

Our use of cookies does not allow us to collect personally identifiable information about you, but is or may be used (for example) to determine if you have previously visited our website or a Third Party Website, to personalise your web browsing experience, to track and report on website usage and performance, and for statistical and security purposes.

You can configure your browser to refuse cookies or delete existing cookies from your hard drive. Rejecting cookies may have the effect of limiting access to or functionality of parts of our website.

## IP ADDRESS

Your internet protocol address (or 'IP address') is the numerical identifier for your computer when you are using the internet. It may be necessary for us to collect your IP address for your interaction with some parts of our website.

## ADVERTISING

When you view our advertisements on Third Party Websites, the advertising company uses cookies, and in some cases, 'web beacons', to collect information such as the server your computer is logged onto, your browser type, the date and time of your visit and the performance of their marketing efforts.

What is a web beacon? A web beacon is typically a transparent graphic image invisible to the user that is placed on a website. The use of a web beacon allows the website to record the simple actions of the user such as opening the page that contains the beacon.

When you access our website after viewing one of our advertisements on a Third Party Website, the advertising company collects information on how you utilise our website (for example, which pages you view) and whether you complete an online application.

## **ONLINE APPLICATIONS**

When you send a completed online application to us, we retain the information contained in that application. We are able to then use that information to provide any financial services that you require.

You may also be able to suspend and save online applications, so you can complete and send the applications at a later time. If you suspend or save your application, the information that you have entered will be retained in our systems so that you may recover the information when you resume your application. Online applications that have been suspended or saved may be viewed by us.

## **UPDATING AND ACCESSING YOUR PERSONAL INFORMATION**

If you wish to make any changes to your personal information, please contact us. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

You may request access to the personal information we hold about you by contacting us. We will respond to your request within a reasonable period. We will give access in the manner you have requested if it is reasonable to do so. We may charge you a fee to access the information. The fee will not be excessive and will not apply to the making of the request.

We may deny you access to your personal information in certain circumstances, for example, if required or authorised by or under an Australian law or a court/tribunal order, or it would be likely to prejudice enforcement related activities by an enforcement body.

If we decide not to give you access, we will provide reasons for the refusal and information on how you can complain about the refusal.

## **BUSINESS WITHOUT IDENTIFYING YOU**

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will provide you with the option to remain anonymous or to use a pseudonym, for example, when you make general inquiries about our business or current promotional offers.

We do not adopt a government related identifier (such as your tax file number or your driver's licence number) as a means of identifying you.

## **HOW SAFE AND SECURE IS YOUR PERSONAL INFORMATION THAT WE HOLD?**

The security of your information is very important to us. We have a range of technical, administrative and other security safeguards to protect your personal information from interference, misuse, loss, unauthorised access, modification or disclosure, and this includes storing it in a secure environment. We also regularly review developments in security and encryption technologies. However, it is important to remember that the use of email and the internet may not always be secure, even with these safeguards in place.

When we no longer require your information, and we are legally permitted to, we take reasonable steps to destroy or de-identify the information. However, sometimes it is impossible or impractical to completely isolate the information then completely remove all traces of the information, and we may store the

information for future use, such as to help resolve disputes between us or assess future applications by you.

The same security safeguards will be in place to protect the information, as detailed in our privacy policy.

## **FURTHER INFORMATION**

Please contact us if you require further information about the way we manage your personal information.

Date of commencement of this website privacy statement - 12 March 2014.**R COMMITMENT TO**

## **PROTECT YOUR PRIVACY**

We understand how important it is to protect your personal information. This document explains how your personal information will be treated as you access and interact with this website.

Our commitment in respect of protecting your privacy is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act 1988 (Cth) and any other relevant law. In compliance with the Credit Reporting Code of Conduct that is issued under the Privacy Act, this document also contains a statement of 'notifiable matters'. This is further explained below.

We have a comprehensive privacy policy in place to ensure that we manage personal information in an open and transparent way. We review our privacy policy periodically and we will amend our privacy policy as the need arises, such as to reflect emerging legislative and technological developments, industry practice and market expectations. This website privacy statement is also reviewed periodically and will be amended as need be.

## **WHO IS BLUESTONE GROUP PTY LIMITED?**

Bluestone Group Pty Limited ACN 091 201 357 is a leading portfolio and capital management business. This website privacy statement applies to this website, which is operated on behalf of Bluestone Group Pty Limited and its related bodies corporate (we, us and our). You can contact us by telephoning (02) 8115 5000 or 13 BLUE or by writing to us at PO Box 1136, QVB Post Shop, NSW, 1230.

## **LINKS TO OTHER WEBSITESLINKS TO OTHER WEBSITES**

This website may contain links to other websites (Third Party Websites) owned or operated by third party providers. We do not operate or control these websites and we are not responsible for their privacy practices. We encourage you to read and understand the privacy policies of any website that collects personal information.

If you access a Third Party Website through our website and if that Third Party Website collects information about you, we may also collect or have access to that information as part of our arrangements with the third party provider.



Where you access a Third Party Website from our website, cookie information ('cookies' are explained below), information about your preferences or other information you have provided about yourself may be shared between us and the third party provider.

## PERSONAL INFORMATION

When we refer to personal information, we mean information or an opinion from which your identity is apparent or can reasonably be ascertained. The personal information we hold about you may also include credit information.

Credit information is a sub-set of personal information and is information which is used to assess your eligibility to be provided with finance. It may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies (CRBs).

### **About credit information and 'notifiable matters'**

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information. You may request to have these notifiable matters (and our privacy policy) provided to you in an alternative form, such as a hard copy.

We exchange your credit information with CRBs. We use the credit information that we exchange with the CRBs to assess your creditworthiness, assess your application for finance and manage your finance. If you fail to meet your payment obligations in relation to any finance that we have provided or arranged, or you have committed a serious credit infringement, we may disclose this information to a CRB.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. We explain how you can do this below.

Sometimes, your credit information will be used by CRBs for 'pre-screening' credit offers on the request of other credit providers. You can contact the CRB at any time to request that your credit information is not used in this way.

You may contact the CRB to advise them that you believe that you may have been a victim of fraud. For 21 days after the CRB receives your notification, the CRB must not use or disclose that credit information. You can contact any of the following CRBs for more information: Dun & Bradstreet (Australia) Pty Ltd ([www.dnb.com.au](http://www.dnb.com.au)), Experian ([www.experian.com.au](http://www.experian.com.au)) and Veda Advantage Ltd ([www.veda.com.au](http://www.veda.com.au)).

## COLLECTION AND USE OF PERSONAL INFORMATION

We may collect personal information from you directly, via your use of our services, or from other business referrers which is reasonable necessary for, or directly related to, our functions or activities, including assessing

and obtaining approval for loans. From time to time we may offer other products and services – please see 'direct marketing' below.

## **TO WHOM WILL WE DISCLOSE YOUR PERSONAL INFORMATION?**

To enable us to maintain a successful business relationship with you, we may disclose your personal information with other entities that provide products or services used by us. The types of entities to which we are likely to disclose information about you include lenders, valuers, insurers, referrers, accountants, CRBs, lawyers, outsource providers and printers. We may also disclose your personal information to any other entities that may have or are considering having an interest in your loan or in our business.

Sometimes we are required or authorised by law to disclose your personal information. Circumstances in which we may disclose your personal information include pursuant to subpoena or to a government agency such as tax authorities.

Some of the entities we referred to here may be located overseas, including the United Kingdom, Ireland, United States and New Zealand. While these entities will often be subject to confidentiality or privacy obligations, they may not always follow the particular requirements of Australian privacy laws. Please see our privacy policy (available upon request) for more information.

## **SENSITIVE INFORMATION**

Sensitive information is any information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

## **COLLECTION AND USE OF SENSITIVE INFORMATION**

We may seek and collect sensitive information about you but only if that sensitive information relates directly to our ability to arrange or provide credit to you or manage the credit provided to you (including, for example, assessing hardship applications and collecting overdue payments).

## **UNSOLICITED INFORMATION**

Sometimes people share information (including sensitive information) with us we have not sought out. This could be through using our website or, for example, requesting us to assess a hardship application. If we receive unsolicited personal information (including sensitive information) about you, we will determine whether we would have been permitted to collect that information. If yes, then we will handle this information the same way we do with other information that we seek from you. If no, and the information is not contained in a Commonwealth record, then we will destroy or de-identify it as soon as practicable, but only if it is lawful and reasonable to do so. Often, it is not possible for us to neatly unbundle this information then destroy or de-identify only certain sections or parts of it, and we may need to store this information for future use, such as to help resolve disputes between us or assess future applications by you. We have many security safeguards in place to protect the information from interference, misuse, loss, unauthorised access, modification or disclosure. This is explained below as well as in our privacy policy.

## DIRECT MARKETING

From time to time we may use your personal information for direct marketing purposes, for example, to provide you with current information about mortgage loans, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with.

If you do not wish to receive direct marketing communications from us or from other organisations, you may at any time decline to receive such communications by contacting us. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

We will not use or disclose sensitive information about you for direct marketing purposes unless you have consented to that kind of use or disclosure.

## COOKIES

A 'cookie' is a small text file placed on your computer by a webpage server that may later be retrieved by webpage servers. We use cookies on our website to provide you with a better website experience.

Our use of cookies does not allow us to collect personally identifiable information about you, but is or may be used (for example) to determine if you have previously visited our website or a Third Party Website, to personalise your web browsing experience, to track and report on website usage and performance, and for statistical and security purposes.

You can configure your browser to refuse cookies or delete existing cookies from your hard drive. Rejecting cookies may have the effect of limiting access to or functionality of parts of our website.

## IP ADDRESS

Your internet protocol address (or 'IP address') is the numerical identifier for your computer when you are using the internet. It may be necessary for us to collect your IP address for your interaction with some parts of our website.

## ADVERTISING

When you view our advertisements on Third Party Websites, the advertising company uses cookies, and in some cases, 'web beacons', to collect information such as the server your computer is logged onto, your browser type, the date and time of your visit and the performance of their marketing efforts.

What is a web beacon? A web beacon is typically a transparent graphic image invisible to the user that is placed on a website. The use of a web beacon allows the website to record the simple actions of the user such as opening the page that contains the beacon.

When you access our website after viewing one of our advertisements on a Third Party Website, the advertising company collects information on how you utilise our website (for example, which pages you view) and whether you complete an online application.

## **ONLINE APPLICATIONS**

When you send a completed online application to us, we retain the information contained in that application. We are able to then use that information to provide any financial services that you require.

You may also be able to suspend and save online applications, so you can complete and send the applications at a later time. If you suspend or save your application, the information that you have entered will be retained in our systems so that you may recover the information when you resume your application. Online applications that have been suspended or saved may be viewed by us.

## **UPDATING AND ACCESSING YOUR PERSONAL INFORMATION**

If you wish to make any changes to your personal information, please contact us. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

You may request access to the personal information we hold about you by contacting us. We will respond to your request within a reasonable period. We will give access in the manner you have requested if it is reasonable to do so. We may charge you a fee to access the information. The fee will not be excessive and will not apply to the making of the request.

We may deny you access to your personal information in certain circumstances, for example, if required or authorised by or under an Australian law or a court/tribunal order, or it would be likely to prejudice enforcement related activities by an enforcement body.

If we decide not to give you access, we will provide reasons for the refusal and information on how you can complain about the refusal.

## **BUSINESS WITHOUT IDENTIFYING YOU**

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will provide you with the option to remain anonymous or to use a pseudonym, for example, when you make general inquiries about our business or current promotional offers.

We do not adopt a government related identifier (such as your tax file number or your driver's licence number) as a means of identifying you.

## **HOW SAFE AND SECURE IS YOUR PERSONAL INFORMATION**

### **THAT WE HOLD?**

The security of your information is very important to us. We have a range of technical, administrative and other security safeguards to protect your personal information from interference, misuse, loss, unauthorised access, modification or disclosure, and this includes storing it in a secure environment. We also regularly review developments in security and encryption technologies. However, it is important to remember that the use of email and the internet may not always be secure, even with these safeguards in place.

When we no longer require your information, and we are legally permitted to, we take reasonable steps to destroy or de-identify the information. However, sometimes it is impossible or impractical to completely isolate the information then completely remove all traces of the information, and we may store the information for future use, such as to help resolve disputes between us or assess future applications by you. The same security safeguards will be in place to protect the information, as detailed in our privacy policy.

## **FURTHER INFORMATION**

Please contact us if you require further information about the way we manage your personal information.

Date of commencement of this website privacy statement - **12 March 2014**.