

Privacy Policy and Collection Notice

1. Introduction

Lumi Financial Management Pty Limited ABN 79 627 897 643 and Lumi Finance Pty Limited ABN 75 627 897 625 (we, our, us) are bound by the Privacy Act 1988 (Cth) (the Act), the Australian Privacy Principles, and the Privacy (Credit Reporting) Code 2014, in our handling of credit-related information. We recognise the importance of ensuring the confidentiality and security of your personal information and are committed to customer service, including protecting and safeguarding your privacy when you deal with us.

This privacy policy and collection notice (Policy) applies to all personal information (including credit-related information) collected by us and is provided to make you aware of how and why we collect, use, manage and protect your personal information and what controls you have over our use of that personal information.

All third parties (including customers, suppliers, subcontractors, or agents) that have access to or use personal information collected and held by us must abide by this Policy.

By using our services, you consent to your information being checked with the document issuer or official record holder and, if Lumi cannot assist you with the provision of financial services (or any other related service), you agree that your contact details may be shared by Lumi with a third party finance provider who may be able to assist.

2. What kinds of personal information do we collect and hold?

Personal information is information or an opinion about an identified individual or an individual who can reasonably be identified. This includes credit-related information, which is personal information that relates to credit and includes identification information, credit history information, information about your credit worthiness and credit reporting information.

We may collect and hold a range of personal information about you that is reasonably necessary for, or directly related to, one or more of our functions, activities, including:

1. name;
2. date of birth;
3. phone/mobile number;
4. email address
5. addresses (current and previous);
6. driver's licence number;
7. credit card and bank account details;
8. information about your financial position, like your income, expenses, savings, assets, and credit arrangements;
9. employment details;
10. tax file number;
11. reasons for applying for a particular product or service;
12. non-public, personal information you knowingly choose to disclose, which is collected on an individual basis via internet, fax, phone, or mail;
13. website use information collected on an aggregate basis as you and others users our website such as IP Address date and time of your visit to our site, the pages viewed and any information downloaded;
14. if you choose to correspond through e-mail, we may retain the content of your e-mail messages together with your e-mail address and all responses sent through our website;
15. information from credit reporting bodies, such as information about amount(s) you (or your organisation) have borrowed, repayment history, default information, and your credit worthiness;

16. details about your activity on selected online webpages;
17. information we obtain to verify representations made by you, such as your passport, Medicare card as well as organisation details (such as name, ABN, address);
18. information about you and your organisation from public sources and other third party affiliated and non-affiliated sources; and
19. details about specific transactions conducted in the course of your business.

3. How we use your personal information

We may use your personal information for a number of reasons, including:

1. assessing and processing a credit application (including credit assessments) you make, or for which you are a guarantor;
2. providing you with a product or service, including issuing accounts to you and administering your account;
3. communicating with you, including assisting you with enquiries or considering any concerns or complaints you raise;
4. conducting customer due diligence, such as verifying your identity;
5. undertaking debt recovery and enforcement activities;
6. internal management purposes, marketing, sales and business development purposes;
7. exchanging information with credit reporting bodies as to the status of your credit facility, both in respect of positive information (like repayment information) and negative information (like defaults);
8. maintaining records following termination of our services to you;
9. compliance with relevant laws, regulations and other legal obligations.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise or we are permitted by law to use such information for an alternate purpose.

4. How we collect information

We only collect personal information to carry on our business, including for one or more of our functions. Without certain details from you we would not be able to carry on our business and provide you with services. We generally collect personal information directly from you through our application processes, forms and other interactions with you in the course of providing you with our products and services, including when you visit our website, call us or send us correspondence.

We may also obtain personal information from the public domain and from third parties such as our related companies, service providers or suppliers, your own representatives (lawyers, accountants etc.) and credit reporting bodies.

If you choose not to provide us with any personal information we request, we may not be able to provide you with our products or services, provide you with credit account facilities or assess persons to be a guarantor(s) of the credit facility. It may also restrict or impede us trading with, extending credit to, continuing to extend credit to or extending further credit you or under a credit facility which you are a guarantor.

We do not give you the option of dealing with us anonymously, or using a pseudonym. This is because, due to anti-money-laundering provisions, it is illegal for us to deal with individuals who are not identified.

When you visit our websites we use common internet technologies, such as cookies, to collect general statistical information and to assist you in using our online services and to enable us to serve you better. The information in the cookies lets us track the various paths followed by users of our website as they move from one page to another while on our website. Web server logs allow us assess site visits and site visit capacity. These methods are not used to capture individual e-mail address or any personally identifying information about you.

5. Unsolicited personal information

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

6. Disclosure of personal information

We may give credit reporting bodies personal information about your credit application and also disclose any default information. The personal information which may be given to a credit reporting body includes, but is not limited to:

1. your identity particulars;
2. the fact that you have applied for credit and the amount;
3. the fact that you have applied to be a guarantor for the credit facility;
4. the fact that we are a current credit provider to you;
5. payments which become overdue more than 60 days and for which collection has commenced;
6. advice that payments are no longer overdue;
7. that credit provided to you by us has been paid or otherwise discharged; and
8. in specified circumstances that, in our opinion, you have committed a serious credit infringement.

We may disclose your personal information to other organisations, including:

1. our related companies (including Lumi Fintech Pty Limited);
2. external service providers who we believe may be able to provide you with a useful alternative or additional finance related service;

3. external organisations that are our assignees, agents or contractors;
4. external service providers to us, such as organisations which we use to verify your identity;
5. debt collecting agencies, if you have not repaid a loan as required; our professional advisors service provider, such as accountants, lawyers, auditors, IT contractors and marketing companies;
6. organisations involved in a transfer or sale of our assets or business, or providing funding for our assets or business;
7. financial institutions involved in managing our payments, such as banks;
8. external organisations that jointly with us, promote or provide products or services to you, or that we may partner with to provide products or services to you;
9. certain entities that have bought or otherwise obtained an interest in your finance product, or that are considering doing so, and their professional advisors;
10. your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you; or
11. regulatory bodies, government agencies, law enforcement bodies and courts as permitted by law; and
12. anyone whom you authorise us to disclose it.

We may further disclose your Personal Information in circumstances where:

1. you have consented to the use or disclosure;
2. such use or disclosure is required or authorised by law (for example, compliance with a subpoena, a warrant or Court order);
3. we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in

reporting the matter to the relevant authorities;

4. we reasonably believe that the use or disclosure is reasonably necessary:
 - a. to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
 - b. for the prevention, investigation, prosecution and/or punishment of crimes or wrongdoings; or
 - c. for the preparation or conduct of proceedings before any Court or Tribunal or the execution of the orders of a Court or Tribunal.

7. Credit reporting bodies

When you apply for, or we provide, our products and services to you, we may share your personal information (including credit information) with credit reporting bodies as set out in this Policy.

The credit reporting bodies that we use are:

1. Illion

w: <https://www.illion.com.au/contact-us/>

t: 13 23 33 or +61 9828 3200

2. Equifax

w: <https://www.equifax.com.au/contact>

t: 13 8332

You can contact these credit reporting bodies directly and request a copy of their privacy policy if you would like to know how they manage your personal information.

If you have been, or have reason to believe that you're likely to become, a victim of fraud, you can ask the credit reporting body not to use or disclose the information it holds about you.

8. Sending information overseas

Sometimes we store or disclose your personal information overseas. The locations we send it to include the United States.

We will not disclose your personal information to overseas recipients without your consent unless:

1. we have taken reasonable steps to ensure that the recipient does not breach the Act; or
2. the recipient is subject to a privacy regime that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles protect the information.

Some of these overseas recipients may not be accountable under the Act.

9. Management of personal information

We recognise the importance of securing the personal information of our customers. We will take reasonable steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to personal information that is held on our computer database, we apply the following guidelines:

1. passwords are required to access the system and passwords are routinely checked;
2. data ownership is clearly defined;
3. we change employees' access capabilities when they are assigned to a new position;
4. employees have restricted access to certain sections of the system;
5. the system automatically logs and reviews all unauthorised access attempts;
6. unauthorised employees are barred from updating and editing personal information;
7. all computers which contain personal information are secured both physically and electronically;
8. data is encrypted during transmission over the network; and
9. print reporting of data containing personal information is limited.

10. Direct marketing

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of the personal information used or disclosed for the purpose of direct marketing. If such a request is made, unless it is unreasonable or impracticable to do so, we will notify you of the source of the personal information.

We may also ask credit reporting bodies to use their information to pre-screen you for direct marketing. You can ask a credit reporting body not to do this.

11. How we keep personal information accurate and up-to-date

We are committed to ensuring that the personal information we collect, hold, use and disclose is relevant, accurate, complete and up-to-date

We encourage you to contact us if any personal information we hold about you needs to be updated. If we correct personal information that has previously been disclosed to another entity, we will notify the other entity of the correction within a reasonable period. Where we are satisfied personal information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We will not charge you for correcting your personal information.

12. Accessing your personal information

Subject to any exceptions in the Act, you can access the personal information that we hold about you by contacting the Privacy Officer. We will generally provide access within 30 days on your request. If we refuse to provide you with access to the personal information, we will provide reasons for the refusal.

We will require identity verification and specification of what personal information is required. An administrative fee for search and photocopying costs may be charged.

13. Making a complaint

If you have any questions about this Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by telephoning or emailing us.

If you think that we have not complied with the Act (including the Privacy (Credit Reporting) Code 2014) you can make a complaint by contacting our office by telephone or email. We will acknowledge your complaint in writing within 7 days and we will aim to investigate and resolve your complaint within 30 days of receiving it.

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner (OAIC)

The OAIC can accept a written complaint:

- on its online [privacy complaint form](#)
- on its privacy complaint form that you've downloaded
- in a letter or fax.

You can send your complaints to the OAIC by:

- mail, to GPO Box 5288, Sydney NSW 2001
- fax, to +61 2 6123 5145

14. Questions

If you have questions regarding this Policy or our handling of your personal information, please contact our office by telephone or email.

15. Updates or changes to this policy

We may occasionally update this Policy. If we do, the updated version will be posted on our website (<https://www.lumi.com.au>) together with the updated date and it will apply to all of your personal information held by us at the time.

The Policy was last updated on 05/12/2023.



You may request to have this Policy provided to you in an alternative form.

Our Customer success team is standing by for further assistance

P: 1300 015 864

E: info@lumi.com.au