

# ***APS Benefits Group Ltd***

## ***Privacy Policy for APPs & Credit Reporting***

### **Our commitment**

The APS Benefits Group Ltd (APSBG) ABN 64 077 846 809 is committed to protecting the privacy and confidentiality of information it collects from members, clients, service providers and contractors.

To achieve this, we will comply with the Privacy Act 1988, the Australian Privacy Principles (APPs) and the Privacy (Credit Reporting) Code 2025.

The Privacy Act 1988 sets out how we are to collect, use, disclose and store personal, credit and credit eligibility information. The Privacy Act 1988 also requires us to have a privacy policy.

### **About us**

The APSBG has a number of wholly owned subsidiaries which are listed below:

- APS Financial Planning Pty Ltd;
- APS Tax, Accounting & Business Services Pty Ltd;
- APS Savings Ltd; and
- APS Wills & Estates Pty Ltd

### **Outline of our Policy**

Our Policy sets out:

- what information we collect and hold
- when you apply for a loan - what information we use from your credit report
- how we collect and hold information
- why we collect, hold, use and disclose your information
- how you can access your information
- how you can correct your information
- how you can make a complaint
- how we will deal with your complaint
- in what overseas countries we are likely to disclose your information

## Information we collect and hold

We will collect and hold:

- your name, date of birth and evidence of identity
- your contact details
- your tax file number
- your facial image captured by cameras on our property
- passwords, passcodes and secret questions used to confirm your authorisation of a transaction
- banking information such as your bank account and credit card details and the credit and debits to your accounts
- family information such as marital status, and details of your spouse and children
- nominated beneficiary information – for a funeral benefit

When you apply for a loan we will also collect and hold:

- information about your financial position
- employment information
- your current credit history

We will only collect information that is related to our providing, or arranging others to provide:

- banking products and services
- financial advisory services
- financial accommodation
- general insurance
- travel services.

## How we collect your information

We will collect information about you and your financial position from you directly. We may also collect information about you from your professional advisers, past or present employers, your medical practitioners, your bank, and in some circumstances, other members or client. When you apply for a loan, we will collect information about your credit history from a credit reporting body.

## What information do we use from your credit report?

We use your credit report to check if what you have told us about your financial history is correct. We look at the following information:

- what are your current loans
- what loans have you applied for
- if available, your repayment history on any loans and your default history
- any payment defaults reported by service providers such as telcos and energy companies
- whether there are any Court judgments against you
- whether you are, or have recently been, a bankrupt
- whether you have committed any serious credit infringements

Your credit report will usually only contain information from the past 5 years. It may contain information from up to the past 7 years if you have committed a serious credit infringement.

We may ask you to explain why your credit report differs from what you have told us about your financial history.

## **Why we collect, hold, use and disclose personal information**

We collect, hold and use your information for a number of reasons, such as to:

- provide membership benefits, financial services and products or information about those benefits, services and products
- give you information about financial services and products from 3rd parties we have agreements with
- conduct market and demographic research in relation to the products and services our members acquired from us

We also collect, hold and use personal information as required by law, for example:

- for our register of members
- to verify your identity and meet our obligations under the AML/CTF Act
- to assess your capacity to pay a loan

We collect, hold and use your information:

- when you apply for a loan – to establish your eligibility for a loan and your capacity to repay
- when you have a loan with us – to disclose information about your loan to a credit reporting body such as:
  - the fact that you have applied for a loan
  - details of the loan, when approved
  - when payments are due
  - whether you have paid on time
  - when you actually paid

## **Providing your information to other entities**

We disclose your information to other entities such as

- entities that verify identity or help us comply with our obligations under the AML/CTF Act
- providers of payment and card services, when you make a transaction or receive a payment
- using a payment service or a card
- entities that help identify illegal activities and prevent fraud
- lawyers, conveyancers, accountants, brokers and agents who represent you
- contractors for statement printing and mail out, card and cheque production, market research or direct marketing
- affiliated product and service suppliers to provide information to you about their services
- and products
- credit reporting bodies and other financial institutions that have previously lent to you
- persons you use as referees
- for property loans – property valuers and insurers
- mortgage documentation service
- trustee and manager of securitised loan programs
- any guarantor or proposed guarantor of a loan
- debt collection agencies, lawyers, process servers
- our auditors

We may disclose your personal information to a lenders mortgage insurer – if we decide to insure the loan.

Each company in the APS Benefit Group may collect, hold, use and disclose any personal information about you which is already held by any other group member, provided such collection, holding, use or disclosure is for a purpose relevant to the provision or proposed provision of a service by us to you.

We and the above third parties will also disclose your information to law enforcement and government agencies as required by law.

## **How we hold your information**

We hold your information in on our computer and paper-based files as appropriate. We have security systems to guard against unauthorised access. We also limit access to our employees on a needs basis.

We will destroy or de-identify information when we no longer need it.



## Overseas disclosure

We do not currently disclose your credit information or credit eligibility information to entities that do not have an Australian link.

We do not currently disclose any of your other information to overseas recipients.

## How you can access and/or correct your information

You can request access to your information at any time. If the information we hold is incorrect, you can request us to correct it.

You can make a request by contacting us, by visiting one of our branches or by telephone. Contact details can be found on our website at [www.apsbenefitsgroup.com.au](http://www.apsbenefitsgroup.com.au).

We do not currently charge any fees for giving you access to your information.

## Making a complaint

You may make a complaint to us if you consider that we have not complied with the relevant provisions of the APPs or relevant credit reporting provisions the Privacy Act and Privacy (Credit Reporting) Code 2025.

You can complain by contacting our Privacy Officer by telephoning us on 1300 131 809 and asking for the Privacy Officer or by emailing [info@apsbenefitsgroup.com.au](mailto:info@apsbenefitsgroup.com.au).

We will deal with your complaint under our internal dispute resolution procedure. We will give you a Guide to our complaints procedure when you make your complaint.

We are also part of an external dispute resolution scheme. If you are not satisfied with how we handled your complaint, you can take the matter

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