

Privacy & Credit Information Policy Statement

This Statement outlines the types of information about you which we may collect, hold, use and disclose, as well as why we do so.

This Statement was last updated on 3 April 2023.

Overview:-

During the regular course of business, Pioneer Credit Limited and its related entities (**Pioneer, we, our or us**) will collect, hold, use and disclose your personal information for various purposes. Rest assured, the security of your information remains our priority.

We will collect your personal information where it's reasonably necessary to do so in connection with the services provided to you. We will aim to collect information directly through you where possible, however we may also collect your personal information through other methods and sources, including via credit reporting bodies, authorised third parties and public databases (such as Facebook or LinkedIn).

We endeavour to get in touch with you directly through the most recent contact details we have, however where this is not possible, we may use contact details found through these other methods. If we are unsuccessful in contacting you, we may reach out to third parties to try to get in touch. These third parties will not receive any information about your account with us and we will act within our obligations under the Australian Debt Collection Guidelines, the Australian *Privacy Act 1988* (Cth), the New Zealand Responsible Lending Code, and the New Zealand *Privacy Act 2020* at all times.

Once you are in contact with us, if you remain on an active payment arrangement or some alternative solutions (such as a hardship agreement), we will not contact any third parties about you, unless you ask us to do so.

We have processes in place to seek to ensure that any information collected about you is securely stored to prevent any misuse, loss or unauthorised access. Your personal information is primarily used to allow us to appropriately manage your account(s) and to comply with our regulatory and contractual requirements, among other genuine business purposes.

This remainder of this Statement provides details of Pioneer's commitment to keeping your personal information secure, and the steps we have taken to protect that information. It also outlines a comprehensive list of reasons why we may collect, hold, use and disclose this personal information, and the parties who we may collect or disclose this information from and to.

If you have any questions, we are here to help. In Australia and New Zealand you may phone us on +61 1300 720 823. You should ask to speak with a member of our Compliance Team, who will be pleased to assist you. You may also email privacy@pioneercredit.com.au, and a member of our team will reply to you promptly.

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Full contact details of all relevant regulators and authorities are included within this Statement.

Introduction

In line with the *Privacy Act 1988* (Cth) (**Act**), the Australian Privacy Principles (**APPs**) and the Privacy (Credit Reporting) Code 2014 (Version 2.3) (**CR Code**), (and, if your account(s) originated in New Zealand, the New Zealand Privacy Act 2020 (**NZ Act**), New Zealand Information Privacy Principles (**NZIPPs**), and the New Zealand Credit Reporting Privacy Code (**NZ Code**)), this Privacy & Credit Information Policy Statement (Privacy Policy) highlights the manner in which Pioneer deals with your personal information and the choices available to you to access or correct your personal information.

Within this policy statement, “you” and “your” means a Pioneer customer.

What is personal information?

Personal information is information or an opinion whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

What is sensitive information?

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection than other personal information because of the nature of the information. It includes information or an opinion about an individual's racial or ethnic origin, vulnerability, health or genetic information, some aspects of biometric information, criminal record, political opinions or associations, religious or philosophical beliefs and trade union membership or associations.

What kind of personal information is collected and held by Pioneer?

We will only collect your personal information where it is reasonably necessary in connection with the services we are providing you. The types of personal information we collect include:

- your name, date of birth, residential and postal address, contact numbers, email address and employment details
- information about your account(s), including, where applicable, your contract(s) with your original or previous credit provider(s) and any personal information you provided in your credit application(s) to your original credit provider(s), details of payments or default(s), default listing(s), correspondence and telephone contact between you and the original or previous credit provider(s), court proceedings and personal insolvency information
- information which you provide us about your financial situation such as your current income and expenses, queries made by you, complaints lodged, repayment history and transaction details
- home ownership details, rental information and information about your assets
- bankruptcy and insolvency information
- business information including directorships and business ownership
- your personal information and credit (including consumer and commercial risk) information held with various credit reporting bodies such as:

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- identification information about you including your current and prior names and addresses, any known alias you may have, your date of birth, your current or last known employer and your driver's licence number
- a statement that an information request has been made about you by a credit provider, mortgage insurer or trade insurer
- your repayment history and any defaults
- credit requests (including amount and type) you have made to other credit providers
- payment information
- certain administrative information relating to credit, such as account and customer numbers
- variations to credit arrangements following a default
- court proceedings and personal insolvency
- the opinion of credit providers about credit infringements committed by you
- other credit reporting information we receive from a credit reporting body
- information that we derive from the credit reporting information we receive from credit reporting bodies
- credit eligibility information
- information that we believe will assist us in locating you where we do not have current contact details, for example in circumstances where we need to collect a debt from you or speak to you about you about a current account you hold with us
- sensitive information (such as criminal records, health information or membership of a professional or trade association/union) which we have collected with your consent, and
- your answers to our security questions, which will allow us to identify you over the phone.

How is your personal information collected?

Where reasonable and practicable, Pioneer will collect your personal information from you. If we are unable to collect personal information from you, other sources which Pioneer collects your personal information from include:

- the credit provider(s) who assigned your account(s) to us
- credit reporting bodies
- any third party who we believe may be able to assist us in making contact with you (where you have not been readily contactable directly)
- any third party authorised by you to be your representative (including your broker, if you are a Pioneer shareholder) or
- publicly available sources of information, including information which is publicly available online, or databases subscribed to by Pioneer such as people search databases, property and tenancy databases.

There may be circumstances where Pioneer is legally required by an Australian or New Zealand law or court or tribunal order to collect your information under Anti-Money Laundering and Counter-Terrorism Financing laws, State and Territory laws, tax legislation and codes of practice in Australia and New Zealand. Pioneer may be required to do this without your knowledge and consent.

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Any unsolicited information we receive about you will be destroyed or de-identified unless it is information we could have collected in the manner described above.

Where practical and reasonable we will obtain your explicit consent before collecting sensitive information.

How does Pioneer use your personal information?

Pioneer uses your personal information for the following purposes:

- to allow us to appropriately manage your account(s), which includes identifying you and arranging for payment of the outstanding balance on your account(s)
- to inform you of services or offers from us which may interest you, via direct marketing (you can tell us not to contact you for this purpose at any time)
- to conduct checks with credit reporting bodies such as Equifax, Experian and Illion
- to facilitate Pioneer's daily operational processes, including necessary record keeping
- to comply with Pioneer's contractual obligations with the credit provider(s) who assigned your account(s) to us
- to comply with legal or regulatory requirements or as authorised by legal or regulatory requirements, regulations and binding codes of practice in Australia and New Zealand, including under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007* (Cth), and, if your account(s) originated in New Zealand, the *Anti-Money Laundering and Countering Financing of Terrorism Act 2009* and associated regulations
- to prevent or investigate any actual or suspected fraud, unlawful activity or misconduct
- for compliance, quality assurance and staff training purposes, for example when we communicate with you through phone calls, we may record or monitor the telephone conversation for this purpose, to determine whether services offered by us may be appropriate for your circumstances, and provide you access to these services such as assistance on how to pay off your debt

Pioneer may also provide information such as personal information, credit account information or your repayment behaviour to other credit providers under comprehensive credit reporting obligations.

We will generally not use or disclose your personal information for any other purpose without your consent, but may do so where:

- it relates to an activity above and such use or disclosure would be reasonably expected
- we need to take appropriate action for suspected unlawful activities or serious misconduct
- it is used to locate a reported missing person
- required to establish, exercise or defend a legal or equitable claim
- required in connection with a confidential alternative dispute resolution process
- we reasonably believe it is required for enforcement related activities of an enforcement body, or

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- as otherwise required or permitted by law or regulatory requirement or pursuant to court order.

Statistical Information Collected

We may collect statistical information regarding the use of any of the websites owned by Pioneer such as:

- a record of your IP address
- the date and time of your visit
- pages accessed and documents downloaded
- the length of time spent on specific areas of a website
- the referring webpage (if applicable)
- the type of browser and operating system used should you decide to contact us via any of our websites.

Remarketing

Pioneer may use remarketing services (or similar audience-targeted feature) in any of its websites for the purpose of advertising and displaying content online

In addition, we may also use interest based advertising to encourage traffic to Pioneer's website.

Google Analytics

We use Google Analytics to help analyse how you use our websites. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our websites. Google will store this information.

If you do not want your website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Third party content (e.g. social media links)

Some of the content on our websites may include applications made available by third parties, such as social media buttons or links that allow you to share content or links to our websites through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.

Who do we disclose your personal information to (including overseas)?

In the course of our business, Pioneer may disclose your personal information to outsourced service providers, which in some cases may be overseas (outside of the country in which you live or from where we collected the personal information), such as our operations in the Philippines, and potentially to recipients in other countries from time to time as well.

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We take our privacy obligations seriously and are committed to ensuring the protection of your personal information no matter where you are located. The types of personal information we may send overseas are outlined in this Policy and the countries to which we may send personal information may vary from time to time depending on the location of the recipients of the information. We take reasonable steps to ensure that such recipients respect your privacy in a similar manner.

Pioneer may also disclose your personal information for the purposes set out in this Statement or as otherwise notified to you to:

- any of our related entities or affiliates
- a credit reporting body, in any manner that is permitted under the Act, the CR Code or the NZ Act or the NZ Code (see below for further details)
- the credit provider(s) who assigned your account(s) to us
- our accountants, auditors, lawyers
- your representatives (authorised party, broker (for Pioneer shareholders), lawyer, financial adviser, executor, administrator or trustee)
- any person to whom such disclosure is otherwise permitted or required by law or regulatory requirement or pursuant to court order
- Pioneer's service providers, agents or contractors appointed to provide services to Pioneer or its related, associated or affiliated companies. We ensure that these third parties observe similar security measures as adopted by Pioneer
- parties where you have given your consent; or
- mail houses contracted to print and distribute statements and other documents and communications.

Marketing

You consent to us using your personal information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and affiliates and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.

If you do not want to receive marketing information from us you can unsubscribe in any of the following ways:

- (a) clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us, or
- (b) contacting our Privacy Officer using the contact details set out at the end of this Statement.

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In respect of our dealings with credit reporting bodies it is important to note that:

- if you fail to meet your payment obligations in relation to consumer and commercial credit or commit a serious credit infringement, we may be entitled to disclose this to credit reporting bodies, and if we are entitled to disclose this to credit reporting bodies, and we choose to, we will do so without any notification to you
- you may request that credit reporting bodies:
 - do not use their credit reporting information for the purposes of pre-screening direct marketing by another credit provider, and/or
 - do not use or disclose credit reporting information about you, if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

Credit reporting bodies will generally be provided with information (including from us) regarding your identification, your creditworthiness, the credit product held or being sought, your repayment history, any defaults and any serious credit infringements committed by you (such as fraudulently trying to either obtain credit or evade your obligations in respect of that credit). In the event we disclose default information about you to a credit reporting body, we will advise that credit reporting body when you have fully discharged the default amount.

Does Pioneer store your personal information securely?

Yes. Pioneer maintains the security of your personal information by implementing up-to-date security control systems designed to prevent:

- misuse, interference and loss of your personal information, and
- unauthorised access, modification or disclosure of your personal information.

If there is a breach which affects the security of your personal information what will Pioneer do?

If Pioneer becomes aware of a breach which affects the security of your personal information we are required to assess whether that breach may likely cause serious harm to you. If we believe there is risk of serious harm Pioneer will notify the Office of the Australian Information Commissioner and/or the Office of the New Zealand Privacy Commissioner, as applicable, and take all reasonable attempts to contact you directly.

How long does Pioneer keep your personal information?

The personal information collected will be retained by Pioneer for the duration permitted or required under law. If specific personal information is no longer needed, Pioneer will take steps to destroy the information or ensure the information is de-identified.

Can you refuse to provide your personal information?

Yes, but if you do not provide Pioneer with some personal information, we may not be able to assist you.

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Can you access your personal information held by Pioneer?

Yes. You have the right to access your personal information held by Pioneer. You may obtain a copy of any personal information we hold about you by contacting us below. To make this request please notify the Privacy Officer via email or post, using the contact options under the heading 'Our contact details' within this Policy Statement.

If you are in Australia, no fee will be imposed to process your request, including deciding whether or not the request is to be granted, but a fee may be imposed to give you access to the personal information you require. In certain circumstances as set out in the Act you will not be able to access your personal information. For example when:

- the information is relevant to legal proceedings between us and could not be obtained by you through the discovery process for those proceedings
- disclosure would be unlawful
- we reasonably suspect you have engaged in unlawful activity or serious misconduct relating to our activities and giving access would prejudice our ability to take appropriate action in respect of your conduct, or
- granting access would prejudice one or more enforcement related activities conducted by an enforcement body.

If your account(s) originated in New Zealand, no fee will be imposed to process your request, including deciding whether or not the request is to be granted, but a fee may be imposed to give you access to the personal information you require. In certain circumstances as set out in the NZ Act you will not be able to access your personal information. For example when:

- disclosure would be unlawful, or
- disclosure would prejudice the maintenance of the law, including the prevention, investigation, and detection of offences, and the right to a fair trial.

Whether you are in Australia or New Zealand, if we do not grant you access to all or some of your personal information we will provide you with a written statement explaining why we denied your request for access.

Your personal information has changed. Can you correct your personal information held by Pioneer?

Yes. We aim to keep your personal information on our records accurate, complete and up-to-date.

You have the right to request your personal information be corrected / updated if the information held by us is incorrect, incomplete or not up to date. To make this request please notify the Privacy Officer via email or post, using the contact options under the heading 'Our contact details' within this Policy Statement. No fee is charged for lodging a request for correction.

We will respond to your requests for access or correction (a), if your account(s) originated in New Zealand, in line with the timeframes as set out in NZ Act, or (b) if you are in Australia, as soon as practicably possible and in any event no later than 30 days after receiving your request.

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How do you lodge a complaint?

If you are unhappy with the way your personal information is handled, or if you would like to lodge a complaint about a breach of the Act, APPs or CR Code, or, if you are in New Zealand, the NZ Act, NZIPPs, or NZ Code, in the first instance you may lodge a complaint via Pioneer's Internal Dispute Resolution (IDR) process.

We will acknowledge receipt of your complaint within 7 days from lodgment. A response to your complaint will be sent to you within 30 days (or a different period if agreed by both parties).

Details for lodging a complaint with Pioneer's IDR

If you wish to lodge a complaint, please refer to our website, <https://pioneercredit.com.au/feedback/>, where you can submit a complaint online. Alternatively, you can lodge a complaint by email or telephone providing all details relevant to your complaint. Our contact details:

Email: compliance@pioneercredit.com.au

Postal Address: PO Box 5673, Perth WA 6831

If you prefer to lodge a complaint verbally, we can register a complaint for you over the telephone. To use this option please contact us on +61 1300 720 823 and ask to be transferred to one of our friendly representatives.

You may refer to our [website](#) for more information on the IDR process.

What if you are unhappy with the outcome of the IDR?

If you are not happy with the outcome of the IDR process, you may lodge the complaint with the Australian Financial Complaints Authority (**AFCA**) or with the Office of the Australian Information Commissioner (**OAIC**), or, if your account(s) originated in New Zealand, you may lodge the complaint with Financial Services Complaints LTD (**FSCL**) or the Office of the Privacy Commissioner (**OPCNZ**).

Please note that a complaint must be lodged and dealt with under Pioneer's IDR process before you can lodge a complaint with AFCA or FSCL.

Details for contacting AFCA

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001
Telephone: 1800 931 678 or Facsimile: 03 9613 6399
Email: info@afca.org.au

Details for contacting the OAIC

The Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992 or Facsimile: 02 9284 9666
Email: enquiries@oaic.gov.au

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Details for contacting FSCL

Financial Services Complaints Limited
PO Box 5967
Wellington NZ 6140
Telephone: 0800 347 257
Email: complaints@fscl.org.nz

Details for contact OPC NZ

Office of the Privacy Commissioner
PO Box 10 094
The Terrace
Wellington 6143
Telephone (04) 474 7590 or 0800 803 909
Or, refer to the online complaints form at www.privacy.org.nz.

Details for contacting our Privacy Officer

Pioneer Credit
Attn: Privacy Officer
PO Box 5673
Perth WA 6831
Telephone: +61 1300 720 823 (ask to speak with a member of our Compliance team)
Email: privacy@pioneercredit.com.au

If you are a Pioneer Shareholder

This section relates to shareholder information only.

As a public listed company on the Australian Securities Exchange, Pioneer collects the personal information of its shareholders, either through the application form completed by you or through its share registry Link Market Services. Personal information of shareholders, which includes information provided upon application for shares is held by Link Market Services and is separate to customer records referred in this Policy Statement.

Pioneer may use and disclose your personal information in the following manner:

- to process your share application and provide services to you as a shareholder
- facilitate dividend payments and other administrative functions
- provide you with updates including Pioneer's annual reports, financial results, information regarding future offers of securities and other disclosures required by law
- your personal information may be disclosed to Pioneer's associated or affiliated companies, outsourced service providers, agents or contractors appointed to provide services to Pioneer or its related, associated or affiliated companies
- your personal information may also be disclosed to regulators, government agencies or any person to whom such disclosure is permitted or required by law or regulatory requirement or pursuant to court order, and
- parties where you have given your consent.

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If you do not provide your personal information Pioneer may not be able to process your application. Your personal information will be retained by Pioneer for the duration permitted or required under law.

If you wish to access or correct your personal information held you may do so online via the Link Market Services website at www.linkmarketservices.com.au or contact your broker. For further information you may contact the Company Secretary on 08 9323 5020.

Please refer to the above for information how you may lodge a complaint regarding a breach of privacy.

Changes to this Privacy Policy

We may, from time to time, update this Privacy Policy. The current Privacy Policy will always be visible on our website: www.pioneercredit.com.au/