



Nimble Australia Pty Ltd ACN 135 501 807 Australian Credit Licence 386010 and our related body corporates Nimble Money Limited ACN 128 541 542 and Nimble (IP) Pty Ltd ACN 128 541 962 (Nimble Group) ('we', 'us', 'our') are committed to protecting the personal information we collect and hold about you.

We recognise that any personal information we collect about you will only be collected, held, used or disclosed for the purposes we have collected it for or as allowed under the law (such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), the Privacy Act 1988 (Cth) or the National Consumer Credit Protection Act 2009 (Cth)). It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act 1988 and any other relevant law.

### **Personal Information**

When we refer to personal information we mean information or an opinion about an identifiable individual, or an individual who is reasonably identifiable. This information may include information or an opinion about you. The personal information we hold about you may also include credit-related information.

Credit-related information means:

- credit information, which is information which includes your identity; the type, terms and maximum amount of credit provided to you, including when that credit was provided and when it was repaid; repayment history information (information about whether you meet your repayments on time); default information (including overdue payments); payment information; new arrangement information; details of any serious credit infringements; court proceedings information; personal insolvency information and publicly available information; and
- credit eligibility information, which is credit reporting information supplied to us by a credit reporting body, and any information that we derive from it.

### **Collection of personal information**

The kinds of personal information we may collect and hold about you depends on your relationship with us (such as whether you are a customer or an employee) and may include your name, date of birth, address, email address, marital status, number of dependants, bank account details (including internet banking log-in details and account numbers), transactional history (e.g. payment history and loan balances), occupation, income details, employer information and any other information we made need to identify you such as your passport, driver's licence or Medicare number.

The main consequences of us not collecting personal information are an inability or delay in being able to identify you, contact you or provide services to you.

We will generally not ask you to disclose sensitive information about yourself, such as your religion or health related information. However, sometimes we may be required to collect or hold sensitive information about you or you may provide unsolicited sensitive information (e.g. if you volunteer information regarding your health). In those circumstances, we will ask for your consent to collect and hold sensitive information about you and we will also determine whether the information is reasonably necessary for one or more of the purposes outlined below. Otherwise, we will destroy or de-identify that information.

### **Electronic Collection**

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

We use a technology called 'cookies' to provide you with better and more customised service and with a more effective Site. A 'cookie' is a small text file placed on your computer by our web page server. A cookie can later be retrieved by our webpage servers. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser.

We or our service providers use cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise our Site for you;
- for statistical and/or behavioural analysis purposes;
- to identify if you have accessed a third party website;
- and for security purposes.

In certain circumstances, data collected from use of cookies, pixels, click re-directs and tag containers may reasonably identify you and/ or potentially constitute personal or sensitive information. By using our website you consent to our use of cookies, pixels, click re-directs and/or tag containers and the data they may collect or disclose, including to overseas entities.

#### **Purposes of collection of personal information**

We collect your personal and credit related information so we can:

- identify you and conduct appropriate checks;
- understand your requirements and provide you with a product;
- set up, administer and manage our products, including the management and administration of underwriting, and obtaining loan assessments and credit reports;
- assess your eligibility to be provided with finance and to manage the credit services we provide to you;
- manage, train and develop our employees and representatives, and providing continuing employment (in relation to our employees only);
- managing our relationship with you, including debt collection;
- manage complaints and disputes, and report to dispute resolution bodies;
- performing research and statistical analysis, including for customer satisfaction and product and service improvement purposes. This may include matching information we collect against other information held by third parties. (We may also use and disclose de-identified data for these purposes);

- helping us tailor existing or develop new products, services or offers which may be offered to you, and to help us selectively target promotional offers and opportunities to your needs; and
- developing or seeking to deliver new ranges of products or services.

You must not give us inaccurate or incorrect information, or omit to provide us with information as we may not be able to provide you with our services.

If we hold sensitive information about you, we will not use the sensitive information for direct marketing purposes unless you specifically consent to us doing so.

Where reasonable and practical we will collect your personal information directly from you. We may also collect your personal information from credit reporting bodies, your bank account providers, our service providers and from finance brokers and, with your consent, from third party social media platforms such as Facebook.

We also collect information when you interact with our website or mobile applications. For more information, please see our Website Policy at <https://nimble.com.au/about-us/website-policy>

#### **Disclosure of information**

We may disclose your personal information to third party service providers we contract with to perform certain functions on our behalf such as:

- Dunn & Bradstreet (Australia) Pty Ltd, Veda or Experian, and any related bodies corporate; and
- database providers who collect (sometimes through the use of first-party cookies, third-party cookies or other third-party identifiers), hold, use and disclose information in order to assist with identity verification, credit scoring and credit reporting bodies, debt collectors and lead providers.

We may also disclose your information to:

- other companies within the Nimble Group;
- Direct Marketers (that is, associated business that may want to market products to you). If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting us in any of the ways listed at the end of this policy. If the direct marketing is by email you may

also use the unsubscribe function. We will not charge you for giving effect to your request and will take reasonable steps to meet your request at the earlier possible opportunity;

- to anyone who represents you or to anyone to whom you have consented to the information being disclosed;
- to investors, agents or advisors or any entity that has an interest in our business;
- where we are required or permitted to do so by law, such as under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) or the National Consumer Credit Protection Act 2009 (Cth);
- to companies that provide information and infrastructure systems to us;
- to third parties that assist us to enhance our business performance and/or the scope and quality of our services to you such as:
  - website behaviour analysis providers;
  - interest data, remarketing and network impression reporting providers;
  - customer, product, business or strategic research and development organisations
  - administration or business management services, consultancy firms, auditors and business management consultants;
  - print/mail/digital service providers; and
  - imaging and document management service;
  - search engine optimisation service providers; and
  - credit reporting agencies.
- to your employer, referees or identity verification services.

The above mentioned recipients may be located overseas and may store your personal information outside of Australia, including in the USA, Ukraine, Canada, New Zealand, India, Ireland, Singapore and the Philippines.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

1. the person or organisation has a commitment to protecting your personal information that is at least equal to our commitment; or
2. you have consented to us making the disclosure.

3. We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located in or outside Australia.

### **Credit-related information**

In most circumstances it will be necessary for us to identify you in order to successfully do business, including answering general inquiries about our product or current promotional offers, however depending on the circumstances we may in some instances do business with you without providing us with personal information. However the extent of the information and services we may be able to provide will be limited.

### **Complaints**

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint, you can contact our complaints officer in any of the ways listed at the end of this policy.

We will acknowledge your complaint within 7 days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to our External Dispute Resolution Scheme, the Credit and Investments Ombudsman which can be contacted on either [www.cio.org.au](http://www.cio.org.au) or 1800 138 422 or the Privacy Commissioner, who can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

### **Further information**

You may request further information or provide feedback on the way we manage your personal or credit-related information by contacting us. Change in our privacy policy We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy policy (including the credit reporting policy) from time to time or as the need arises. You should regularly review this page to familiarise yourself with our updated privacy policy.

You may request this Policy in an alternative form by contacting us in any of the below ways.

Contact Details:

Phone: 133 158  
Email: [customercare@nimble.com.au](mailto:customercare@nimble.com.au)  
Postal Address: PO Box 3592,  
Australia Fair QLD 4215

This Policy was updated on 27 October 2016