

# Tennant Finance

## Privacy Policy and AML/CTF Identity Verification

Your privacy is very important to us. We take reasonable steps to implement practices, procedures and systems to collect, use and disclose your personal information in accordance with the Privacy Act 1988, ("the Act") and the Australian Privacy Principles ("APPs"). The collection, use and disclosure of your personal information may also be governed by the Credit Reporting Privacy Code ("the Code"), the Anti-Money Laundering Counter-Terrorism Financing Act 2006 ("the AML/CTF Act") and the EU General Data Protection Regulation ("GDPR").

### Who we are

This Privacy Policy applies to all personal information collected by Tennant Finance and its agents and principals. We are a credit provider ('CP') under the Act.

Our contact details are:

Tennant Finance  
PO Box 6215  
North Sydney NSW 2060  
Tel: 1300 657 579

### What we collect

#### If you are applying for credit

Tennant Finance operates in commercial markets to provide credit to its customers. This means that we will collect and use relevant Personal Information and Credit Information about you that is reasonably necessary for or directly related to assessing your application for credit or your intention to guarantee an application for credit.

If you agree, we will use your Personal Information to verify your identity electronically for the purposes of the AML/CTF Act.

We may also use your Personal Information and Credit Information for a related or reasonably anticipated secondary purpose.

Personal Information is information that identifies or can reasonably identify who you are. In terms of Credit Information, the kinds of Credit Information that we collect are:

- identification information
- consumer credit liability information

- repayment history information
- a statement that an information request has been made by us
- the type and amount of credit sought in your application
- default information
- payment information
- new arrangement information
- court proceedings information
- personal insolvency information
- publicly available information (where not included in new arrangement and personal insolvency)
- our opinion that you have committed a serious credit infringement in relation to consumer credit provided by us

The Credit Information may be made available to other companies in the Group, for example where credit is required from more than one of our companies.

The Group collects sensitive information but only if it is necessary.

Credit Information is also collected from credit reporting bodies ("CRBs"). The information obtained from CRBs is known as credit reporting information. We use credit reporting information to derive information about you that affects your credit worthiness and can be used to establish your eligibility for credit ("CP derived information"). The kinds of CP derived information that we usually store includes credit information, previous applications for credit made by you with other CPs and any adverse listings against you.

The CRB that we deal with is Equifax. You can obtain Equifax's privacy policy from their website:

[www.equifax.com.au/privacy](http://www.equifax.com.au/privacy)

## How we collect and store

Personal Information and Credit Information is collected electronically and in hard copy. The information is generally collected by us or by our authorised agent, from you or from someone authorised by you. The information may also be collected from publicly available sources. We may collect additional Credit Information during the course of our dealings with you, as required from time to time.

The Personal Information and Credit Information that we collect is generally stored electronically although hard copies of certain documents are sometimes retained. We have processes in place to ensure the security of your personal information and to protect it against loss, unauthorised access, use, modification and disclosure. We apply data encryption to electronically stored information.

Any Personal Information, Credit Information or sensitive information that is no longer required is destroyed, deleted or de-identified in accordance with the prescribed procedures set out in the Privacy Act, the APPs, the CR Code and the AML/CTF Act.

We may disclose your personal information to third parties we engage to provide us services in connection with our activities. Those third parties may be located in Australia or overseas. If overseas, those third parties will generally be located in either New Zealand, the Philippines, India, Canada, the United States and China.

We may also disclose your Personal Information to a recipient outside Australia for international transactions. For example, where the credit you obtain from us requires us to pay an amount to a party located overseas to process the transaction. The overseas party and country we disclose your information to will depend on the details of the transaction you have asked us to carry out.

If we are not able to collect some of the requested information, we may not be able to process your application for credit and it may be refused.

## How we use and disclose

We disclose your name, residential address and date of birth ("Verification Information") to the CRB to verify your identity electronically. If you are an individual, we will obtain your consent before we disclose your Verification Information to the CRB for electronic verification. When requested by us, the CRB may provide an assessment of whether the information that we have disclosed matches the information held by them. When preparing the assessment, the CRB may use Verification Information about you as well as Verification Information that it already has about other individuals.

If you do not wish to disclose your Verification Information to the CRB for electronic verification, we can provide an alternative means of verifying your identity.

We collect, store and use your Credit Information for the primary purpose of assessing your application for commercial credit. If you do not allow us to collect and use your Personal Information and Credit Information, we may be unable to proceed with your application for commercial credit.

If required under the Act or the APPs, we will obtain your consent to exchange your Credit Information with other CPs, CRBs and entities that may be connected with your dealings with us. We only contact trade creditors and references nominated by you.

We disclose certain credit information to CRBs. This includes Credit Information, the type of commercial credit sought, the amount of credit sought, default information and payment information.

We make all reasonable attempts to ensure that the Credit Information disclosed to CRBs is accurate, up-to-date and complete. If Credit Information does not meet this criteria, we will as soon as practicable advise the CRB of this and take reasonable steps to address this. The CRB to which we disclose credit reporting information is Equifax. You can obtain Equifax's privacy policy from their website: [www.equifax.com.au/privacy](http://www.equifax.com.au/privacy)

Your Credit Information will be disclosed if we are required to do so by law, including 'permitted general situations' and 'permitted health situations' as defined by the Act.

We share certain personal information with third parties who help us to detect and prevent fraudulent transactions. The information we share with those third parties includes some of the information that you share with us (such as,

your email address), and some of the information from your online interactions (such as the IP address of your device). That information is used to determine whether a transaction could be fraudulent. One of the third parties we use to help us detect and prevent fraudulent transactions is Emailage; which is responsible for their use of your personal information and will use it solely for the purposes set out in their privacy policy ([www.emailage.com/privacy-policy](http://www.emailage.com/privacy-policy)). Their privacy policy also includes further information about your privacy rights including to access and correct your personal information, and make a privacy complaint."

## **Verifying your identity electronically**

Under the AML/CTF Act, we may disclose your name, residential address and date of birth ("Verification Information") to a CRB to verify your identity electronically. The CRB we use is Equifax. If you are an individual, we will obtain your consent before we disclose your Verification Information to the CRB. When requested by us, the CRB may provide an assessment of whether your Verification Information matches the information held by them.

When preparing the assessment, the CRB may use Verification Information about you as well as Verification Information that they already have about other individuals.

If your identity is unable to be verified electronically by the CRB, we will provide you with written notice of this and provide you with information about alternative ways we can verify your identity. If you do not consent to your identity being verified electronically, you will need to provide us with certified copies of your identification documents.

## **Direct Marketing**

We may use your Personal Information to send you direct marketing communications about our products and services. These communications may be sent by the Group or a third party we engage to send the communication on our behalf. The communications may be sent in various forms and media including mail, telephone, email, social media or SMS. At any time you may opt-out of receiving direct marketing communications from us.

## **EU General Data Protection Regulation**

For the purposes of the GDPR we are a data controller. We use a customer review service called TrustPilot to collect feedback from our customers on our behalf. We may disclose your name and email contact details, to TrustPilot and you may receive an invitation from TrustPilot to write a review of your experience and dealings with us. You are under no obligation to accept the invitation or provide a review. You can also unsubscribe from receiving any further communications from TrustPilot. TrustPilot's head office is located in Denmark. For the purposes of the GDPR, TrustPilot is a data processor. It is possible that your personal information may be processed by TrustPilot in Denmark or another European Union country.

## Your Rights

- You have the right to access your Personal Information and Credit Information from us, to request that we correct the Personal Information or to make a complaint.

**Access** – we will provide access to your Personal Information and Credit Information when requested to do so, within 30 days of your request (unless an extension is agreed to in writing). However, access will not be provided unless we obtain such evidence as is reasonable in the circumstances to satisfy ourselves as to your identity. We may impose a reasonable charge for providing access.

**Correction** – where we are satisfied that the Personal Information and Credit Information held by us is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct the information within 30 days. You will be notified within 5 business days after a decision is made about the result of your correction request. Where necessary, we will consult the CRB prior to making the correction.

**Complaint** – you are entitled to complain to us about a breach. We will acknowledge the receipt of any complaint within 7 days and a decision in relation to your complaint will be made within 30 days (unless an extension is agreed to in writing).

We will deal with your complaint in accordance with ISO 10002-2006 Guidelines for Complaints Handling in Organisations. If we are unable to resolve the issue to your satisfaction, you may complain to the Office of the Australian Information Commissioner ("OAIC").

The relevant contact details are:

**OAIC**  
GPO Box 5218  
Sydney NSW 2001  
Tel: 1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

- You have the right to request CRBs not to use their credit reporting information for the purposes of pre-screening of direct marketing by us.
- You have the right to request the CRB not to use or disclose credit reporting information about you if you believe on reasonable grounds to be or have been a victim of fraud.

You can direct any query that you may have about our Privacy Policy to our Privacy Officer as follows:

The Privacy Officer  
Tennant Finance  
PO Box 6215  
North Sydney NSW 2060  
Tel: 1300 657 579  
[privacy@tennantfinance.com.au](mailto:privacy@tennantfinance.com.au)

## Obtaining a copy

A copy of this Privacy Policy is available on our website at:

<http://au.tennantco.com/apac-en/parts-service/leasing-and-financing/privacy>

If you do not have access to our website, a copy will be provided to you, on request.

## Privacy Policy – Notifiable Matters

The following list of notifiable matters is provided as prescribed by the Credit Reporting Code. It is to be read in conjunction with our Privacy Policy.

1. We disclose personal information and credit information about you to our credit reporting body ("CRB"). The CRB is Equifax and can be contactable on [www.equifax.com.au](http://www.equifax.com.au). Equifax may include personal information and credit information about you to us, to assist us in assessing your credit worthiness.
2. If you commit a serious credit infringement, we may be entitled to disclose this to the CRB. A serious credit infringement refers to situations where a reasonable person would consider an individual's act to indicate an intention not to comply with his/her obligations regarding credit AND the individual cannot be contacted AND at least six months have passed since credit was provided.
3. You have the right to request access to the information that we hold about you, to correct the information and to make a complaint. Details of how you can do this are set out in our Privacy Policy.
4. You have the right to request that our CRB withhold the use of your credit reporting information for the purposes of pre-screening of direct marketing by us. Pre-screening occurs where we provide our CRB with a specific list of individuals and request that our CRB pre-screen these individuals, using eligibility requirements that we nominate.
5. You have the right to request that our CRB withhold the use or disclosure of your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.