

Privacy Policy

The Commercial & Asset Finance Brokers Association of Australia Limited ABN 320129 490 133 (*'CAFBA', 'we', 'us', 'our'*) values your privacy and is committed to protecting it and the confidentiality of your personal and credit information (information). In handling your information, we are bound by, and comply with, the Privacy Act 1988.

This privacy policy sets out how we collect and manage your information, how you can access that information if you wish and how you can complain if you are not satisfied with our policies and processes.

1. Collection and storage of personal information

We collect information from, and about, you to, as appropriate:

- assess your membership application and your annual membership renewal
- provide membership services and support

We also use the information we collect to:

- manage CAFBA in accordance with its Constitution
- respond to regulatory enquiries, investigations and policy developments
- undertake market research
- obtain legal and compliance advice
- meet our regulatory and legal obligations

The information we collect may include personal identification, contact details, financial information, credit history, banking details, personal and trade references and employment or business history and commercial business information, depending on your membership status. If you choose not to provide this information, our ability to provide you with the member services you require may be restricted.

Wherever possible, we will collect your information directly from you. Where we obtain information about you from a third party, such as referees, wherever possible we will tell you who we need to contact and why.

We may also collect information from you if you choose to use our website to communicate with us. We will collect the information you provide through our interactive facilities, such as customer enquiry, online function applications or comment/survey forms.

In some circumstances, referees, other members or peak bodies or government bodies may provide us with your information. The circumstances in which third parties provide us with information include membership application assessments and complaints.

We take steps to protect any information we collect so it will be safeguarded from misuse, loss, unauthorised access, use, disclosure or modification.

The law may require us to retain your information for a period of time after your membership has ceased. It is securely stored and disposed of, or de-identified, when no longer required.

2. Website information collection

2.1 General

When you visit our website, our ISP host records a range of information, including your server address, domain name, the date and time of the visit and the pages viewed. This information may be collected by using cookies which is data sent to your web browser. This allows our site to interact more efficiently with your computer.



If you disable the use of cookies, your use of our site may be affected. Information collected about your visit to our site is retained for statistical and website development reasons and is not in a form which would enable us to identify you, unless you use the website to provide us with information.

When visiting our site, you will not be required to provide us with any information unless you request information about our services or respond to a promotion. If you do, we will ask you to provide contact details along with other information required to respond to your contact with us and the service you require

We may also retain that information provided for planning purposes.

2.2 Third Party Applications

Third party applications, such as Facebook, Twitter or LinkedIn, may be available from our website. We may also use Dropbox to share information with you. The providers of those third party applications may collect personal information from you.

If any of these services are used, your information may be stored overseas. Their collection and management of your information is bound by their own information collection policies and practices, available on their websites.

We only use third party applications where we are confident they have privacy obligations and compliance requirements compatible with Australia's Privacy Act.

3. Use and disclosure

3.1 General

We use your information to assess your suitability to be a CAFBA members and to perform other functions and activities associated with the services we provide to you, as well as making publicly known your business' availability to offer services.

Those functions and activities can include our internal administration, account management, meetings, professional and/or social events, service development, training opportunities, complaints management, planning and research requirements, and publishing your business contact details on our website.

3.2 Third party disclosures

We will disclose your information to third parties only as the Privacy Act permits and where there is a valid reason to do so. All third parties must use your information only for the specific purpose for which we supply it.

Third parties may include:

- referees, where authorised
- service providers (e.g. membership services managers, computer systems consultants, document custodians, mailing houses, legal advisers etc) to enable them to perform services for us
- IT communications service providers, such as Dropbox or Facebook, where your information may be stored offshore in countries such as the United States or Switzerland, in compliance with their privacy policies which is available on their respective websites
- government authorities and law enforcement agencies, as permitted or required by law only.

3.3 Credit Reporting Body Reports

Where you provide us with your credit report from a credit reporting body (CRB), we ensure that report is destroyed immediately it has been used for membership application or renewal purposes.

3.4 Marketing

We may use your personal information to allow us to provide you with information about our services and those of associated entities, unless you tell us you do not wish to receive marketing material.

You can opt out of CAFBA marketing material at any time by contacting us in any of the ways set out in (7).

With one exception, we do not provide your details to third parties for marketing, promotional or any other purposes, other than as required by law. Unless you have informed us you do not wish receive marketing information, we may, on request, provide an Affiliate Member with a list of member information, which includes your details, but only if that information is publicly available on our website under (3.1).

4. Access and correction, and destruction, of personal information

You have the right to view any information we hold about you. If any information is incorrect, out of date or incomplete, you have the right to have that information updated and corrected.

Access is subject to some exceptions allowed by law. For example, where access would:

- be unlawful;
- pose a serious threat to the life or health of an individual;
- have an unreasonable impact on the privacy of others;
- prejudice enforcement activities such as criminal proceedings or negotiations with you; or
- reveal certain information relevant to legal and/or dispute resolution proceedings.

We may also deny your request for access if it is frivolous or vexatious. If, for any valid reason, we refuse to correct your information, we will explain why.

We will destroy or de-identify your personal information after we no longer require it for the purposes we collected it or the law no longer requires us to keep it.

5. Changes to this policy

We may change this Policy from time to time to ensure its compliance with the Privacy Act. If you do, we will notify you of all substantive change through our membership bulletin.

You can also obtain the current version from our website or by contacting us by any of the contact methods below.

6. Complaints

Please contact us if you have any complaints or queries about how we manage your information or you no longer wish to receive marketing materials. You can contact us by mail, phone or email, as listed in (7) below.

All complaints will be handled in accordance with our Dispute Resolution Process.

If you lodge a complaint, our Internal Dispute Resolution officer will investigate your complaint. We will commence the investigation within 2 days and provide you with a response within 14 days. We will seek your agreement to a longer time if it is needed. We will keep you informed of the investigation process by phone or email at least once a week and provide you with a written response to your complaint within 30 days.

7. Contact Us

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Phone 1300 022 322
Fax 02 9431 8677
Email: info@cafba.com.au
Web: www.cafba.com.au

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