

A.C.N. 131 609 062
Australian Credit Licence Number 391654

12 March 2014

" Rockwell Finance Pty Ltd " means Rockwell Finance Pty Ltd
A.C.N. 131 609 062
its Subsidiaries, Associated Entities and Contractors.

"You" and "Your" means you the applicant or applicants.

We collect, use and retain personal information in accordance with the Australian Privacy Principles (“APPs”) issued in accordance with and under the Privacy Act 1988 (Cth) (“Privacy Act”) and our own policies and procedures. This Policy is intended to regulate the handling of any personal information that we collect. We have developed this Policy as part of our ongoing commitment to the protection of your privacy.

- a) Provide a set of Privacy Standards which govern our procedures and which protect the privacy of your personal information;
- b) Demonstrate our ongoing commitment to protecting your privacy and addressing any privacy concerns that you might have;
- c) Describe the ways in which we collect, use and handle your personal information;
- d) Ensure that we comply with the APPs;
- e) Facilitate our compliance with any further developments in the protection of privacy;
- f) Explain how an individual may complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds us, and how we will deal with such a complaint; and
- g) Explain if we are likely to disclose personal information to overseas recipients and if it is practicable to specify those countries which such recipients are likely to be located in the policy.

- a) Will ensure that we comply with the Australian Privacy Principles and any registered APP Code that binds us; and
- b) Will enable us to deal with inquiries or complaints from individuals about our compliance with the Australian Privacy Principles or such a Code.

Third Party Sources

Where we collect personal information from a third party, we will take reasonable steps to ensure that you are aware of the matters listed in (a) and (b) above, unless telling you of those matters would pose a serious threat to the life or health of any individual.

Identification

Inline with Australia Privacy Principal 2 it is generally impracticable for us to deal with an individual who has not identified themselves appropriately to us. This is necessary as standard business practice and also protects you against someone using your name or identity fraudulently to obtain finance or insurance. Wherever it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously, if you request it.

Purpose of Collection of Information

We will not collect personal information (other than sensitive information) unless the information is reasonably necessary for, or directly related to, one or more of our functions or activities.

Sensitive Information

We will not collect sensitive information about an individual unless:

- a) The individual consents to the collection of the information and;
- b) The information is reasonably necessary for one or more of our functions or activities.

Unsolicited Information

Should we receive unsolicited personal information we will within a reasonable period of time determine if we could have collected the information under Privacy Principle 3 had we solicited the information. If we determine that we should not have collected the information we shall destroy the information. Should the information have been collectable it shall be treated in accordance with Australian Privacy Principles.

Information Collected for a Particular Purpose

If we hold personal information about an individual that was collected for a particular purpose (the primary purpose), we will not use or disclose the information for another purpose (the secondary purpose) unless:

- a) The individual has consented to the use or disclosure of the information; or
- b) The individual would reasonably expect the APP entity to use or disclose the information for the secondary purpose and the secondary purpose is:
 - If the information is sensitive information—directly related to the primary purpose; or
 - If the information is not sensitive information—related to the primary purpose; or
- c) The use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- d) A permitted general situation exists in relation to the use or disclosure of the information by us; or
- e) We reasonably believe that the use or disclosure of the information is reasonably necessary for one of more enforcement related activities conducted by, or on behalf of, an enforcement body.

Information & Disclosure

If we hold personal information about an individual, we will not use or disclose the information for the purpose of direct marketing unless:

- a) We have collected the information from the individual; and
- b) The individual would reasonably expect us to use or disclose the information for that purpose; and
- c) We provide a simple means by which the individual may easily request not to receive direct marketing communications from the organisation; and
- d) You have not made such a request.

Before we would disclose personal information about an individual to a person ("Overseas Recipient"):

- a) Who is not in Australia or an external Territory; and
- b) Who is not the entity or the individual;

We will take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles (other than Australian Privacy Principle 1) in relation to the information.

Information - Details & Description

We will not adopt a government related identifier of an individual as its own identifier of the individual unless the adoption of the government related identifier is required or authorised by or under an Australian law or a Court/Tribunal order.

We will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that the entity collects is accurate, up to date and complete.

We will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that the entity uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up to date, complete and relevant.

Use of Information

If we hold personal information, we will take such steps as are reasonable in the circumstances to protect the information:

- a) From misuse, interference and loss; and
- b) From unauthorised access, modification or disclosure.

If we hold personal information about an individual we will on request by that individual, give the individual access to the information. We are however not required to give an individual access to the personal information to the extent that:

- a) We reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- b) Giving access would have an unreasonable impact on the privacy of other individuals; or
- c) The request for access is frivolous or vexatious; or
- d) The information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings; or
- e) Giving access would reveal the intentions of the entity in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- f) Giving access would be unlawful; or
- g) Denying access is required or authorised by or under an Australian law or a Court/ Tribunal order; or
- h) Both of the following apply:

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- A. We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the entity's functions or activities has been, is being or may be engaged in and that:
 - Giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
 - Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - B. Giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

Requests for Information

We will:

- a) Respond to the request for access to the personal information:
 - If the entity is an agency—within 30 days after the request is made; or
 - If the entity is an organisation—within a reasonable period after the request is made; and
- b) Give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so.

If we refuse access to personal information we will give written notification that sets out:

- a) The reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- b) The mechanisms available to complain about the refusal; and
- c) Any other matter prescribed by the regulations.

Correct Personal Information

If We hold personal information about an individual and we are satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading and the individual requests the entity to correct the information we will take such steps (if any) as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

Should We correct personal information about an individual that we previously disclosed to another party and the individual request us to notify the other party of the correction we will take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

If we refuse to correct the personal information as requested by the individual, we will give the individual a written notice that sets out:

- a) The reasons for the refusal except to the extent that it would be unreasonable to do so; and
- b) The mechanisms available to complain about the refusal; and
- c) Any other matter prescribed by the regulations.

Complaints Handling and Disputes Procedure

Should you be unhappy about our treatment of your personal information or you believe there has been a breach of this Policy, please contact our Privacy Officer clearly setting out the nature of your concern.

Complaints can be made orally at first instance, or in writing addressed to;

The Privacy Officer, Rockwell Finance Pty Ltd
588A Main North Road Gepps Cross, SA 5094

Where a complaint is made orally you must confirm the complaint in writing as soon as possible. If you require assistance in lodging your complaint, please contact us urgently.

Your complaint will be reviewed and you will be provided with a written response. If it cannot be resolved, your complaint will be referred to our Internal Disputes Resolution Service and you will receive a response in writing within fifteen (15) working days, setting out:

- The general reasons for the outcome; and
- Information on the further action that you can take, should you remain dissatisfied with our handling of your complaint or the outcome of your complaint.

In either case, your complaint will be reviewed by someone with appropriate authority to deal with the complaint.

Further Review of your Complaint

If you are still not satisfied with our review, you may take your complaint to the Office of the Australian Information Commissioner. The Commissioner has the power to investigate complaints and recommend appropriate action to remedy your complaint.

You can contact the Commissioner on 1300 363 992, or by writing to the Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001.

Compliance with This Policy

We implement this Policy through the use of proper procedures and staff training to ensure compliance with this Policy.

We ensure that all our employees and any representatives who deal with personal information are aware of the standards of this Policy.

We require that all of our staff and representatives with access to personal information maintain confidentiality concerning that personal information. We implement that requirement through appropriate contractual terms and internal policies.

Our procedures for handling personal information are developed to implement the standards of this Policy. We train our employees in the proper conduct of those procedures that are relevant to their duties.

Our Privacy Officer – Contact Details

For further information about Rockwell Finance Pty Ltd your Privacy or to access our complaint handling and dispute procedure, please address your correspondence to:

The Privacy Officer
Rockwell Finance Pty Ltd
588A Main North Road Gepps Cross, SA 5094