

Thinktank Consumer Data Right (CDR) Policy

Thinktank Group of Companies

("TTG" or "Thinktank")

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1 About us

Think Tank Group Pty Ltd (Thinktank, we, us, our) is a specialist non-bank property lender operating under Australian Credit Licence 564080 and Australian Financial Services Licence 331316. We provide commercial, residential, construction, SMSF, and private lending products distributed through the mortgage broker channel.

This Consumer Data Right Policy applies only to Think Tank Group Pty Ltd. It covers all covered products publicly offered by Thinktank under a standard form contract in the non-bank lenders sector.

2 About the Consumer Data Right (CDR)

The Consumer Data Right (CDR) is an Australian Government initiative established under Part IVD of the Competition and Consumer Act 2010 (Cth). It gives consumers the right to safely access certain data held about them by businesses and to direct that data to be shared with accredited third parties of their choice.

What does this mean?

Where Thinktank holds CDR data about you or your lending products, you will be able to ask us to share that data with accredited data recipients you choose. In this policy, we refer to this as your Thinktank CDR data.

The CDR is jointly regulated by the Australian Competition and Consumer Commission (ACCC) and the Office of the Australian Information Commissioner (OAIC). The legislative framework includes the Competition and Consumer Act 2010 and the Competition and Consumer (Consumer Data Right) Rules 2020.

3 About this policy

This policy describes your rights under the CDR legislation as they apply to Thinktank.

If you want to know more about how we handle your personal information generally, see our Privacy Policy at thinktank.au.

We update this policy when our obligations or practices change. You can always find the most current version at thinktank.au, and you can ask us to send you a copy at any time.

4 Your privacy and security

Your privacy and the security of your information is important to us. We protect your information and aim to be clear and open about what we do with it. We adhere to relevant security and privacy regulatory requirements and maintain appropriate controls to keep your information safe.

5 What data will be available under the CDR?

Data sharing is not yet active

Our obligation to share consumer data under the CDR does not commence until 10 May 2027. Until that date, we are not able to share consumer data (such as account balances, repayment history, or transaction details) through the CDR framework. If you would like to request data we hold about you in the meantime, please send a written request to loansupport@thinktank.au and we will assist you under our Privacy Policy.

As a data holder under the CDR, from 10 May 2027 we will be required to make available the following categories of data:

- Account and loan details relating to your covered products with us.
- Repayment history and scheduled payment information.
- Account balances and outstanding amounts.
- Features and terms of products you hold with us.
- Your name, contact details, and related account holder information.

The products covered by this policy are those publicly offered by Thinktank under a standard form contract in the non-bank lenders sector, including our commercial property loans, residential loans, SMSF loans, and private lending products. White-label products issued by Think Tank Group Pty Ltd are also covered.

The following are not covered: Thinktank Asset Management wholesale products and Firstrata Finance strata lending products, which are outside the CDR retail product scope.

6 Sharing your Thinktank CDR data

Not yet available

Consumer data sharing will be available from 10 May 2027. The information below describes how sharing will work once our obligations commence. If you need access to data we hold about you now, please contact us at loansupport@thinktank.au or call 1300 163 184.

From 10 May 2027, you will be able to choose to share your Thinktank CDR data with an accredited data recipient so they can provide you with a product or service.

We will share your Thinktank CDR data only with your explicit consent, and we will not charge a fee for sharing your data.

To authorise data sharing, you will need to give your consent to an accredited data recipient (on their platform), who will then direct you to Thinktank to confirm the request. We will verify your identity before sharing any data.

How to correct your Thinktank CDR data

From 10 May 2027, if any of your Thinktank CDR data is incorrect, you can contact us to request a correction. We will let you know within a reasonable timeframe whether we have corrected the data or if we found it to be accurate.

If you are an individual, you also have the right now to access and correct personal information Thinktank holds about you under the Australian Privacy Principles. To make a request, contact us using the details below.

Contact method	Details
Email	loansupport@thinktank.au
Phone	1300 163 184 (Monday to Friday, 9:00am – 5:30pm AEST)
Post	Attention: Compliance Team, Think Tank Group Pty Ltd, Level 24, 101 Miller Street, North Sydney NSW 2060

7 When we notify you

Once data sharing commences, we will notify you:

- When you set up, amend, or stop a data sharing arrangement, or when an arrangement expires.
- In the event of an eligible data breach affecting your CDR data under the Notifiable Data Breaches scheme.
- If you request us to correct your CDR data.

8 How we deal with complaints

We want to make things right. If there is a problem with how we handle your CDR data, it is important we hear about it so we can address it.

9 How to make a complaint

Contact method	Details
Email	loansupport@thinktank.au
Phone	1300 163 184 (Monday to Friday, 9:00am – 5:30pm AEST)
Post	Attention: Compliance Team, Think Tank Group Pty Ltd, Level 24, 101 Miller Street, North Sydney NSW 2060

Please tell us:

- Your name and contact details (you may make an anonymous complaint if you prefer).
- What your complaint is about, including the way we have handled your CDR data, what went wrong, and what you would like us to do.
- Any relevant dates, references, or supporting documents.

What happens after you make a complaint?

We will acknowledge your complaint within 1 business day of receipt. We will investigate and provide a written response within 30 calendar days. If we are unable to resolve your complaint within 30 days, we will let you know the reason for the delay, give you an expected timeframe, and continue to update you on our progress.

If you are not satisfied with our response

If you are not satisfied with the outcome of your complaint, you may lodge a dispute with an external body:

Body	Contact
Australian Financial Complaints Authority (AFCA)	afca.org.au 1800 931 678 (free call)
Office of the Australian Information Commissioner (OAIC)	oaic.gov.au 1300 363 992
Australian Competition & Consumer Commission (ACCC)	acc.gov.au 1300 302 502

You may contact an external body at any time. You are not required to complete our internal process first, although doing so may help resolve the matter more quickly.

10 We're here to help

If you have a question about our CDR Policy or need help, contact us at loansupport@thinktank.au or call 1300 163 184 (Monday to Friday, 9:00am to 5:30pm AEST) and we will be happy to assist.

11 Definitions

Term	Meaning
ACCC	Australian Competition and Consumer Commission — administers the CDR Rules and maintains the CDR Register.
AFCA	Australian Financial Complaints Authority — external dispute resolution scheme for financial services complaints.
CDR	Consumer Data Right — the regime under Part IVD of the Competition and Consumer Act 2010 (Cth).
CDR data	Data designated as subject to the CDR, including consumer data relating to covered products.
CDR Rules	Competition and Consumer (Consumer Data Right) Rules 2020.
Consumer data	CDR data that relates to a consumer and their use of a product. Requires consent before sharing. Commences 10 May 2027.
Covered product	A retail product publicly offered by Thinktank under a standard form contract in the non-bank lenders sector.
Data holder	An entity that holds CDR data and is required to share it under the CDR Rules.
OAIC	Office of the Australian Information Commissioner — regulates CDR privacy safeguard compliance.
Privacy Safeguard	One of the 13 privacy safeguards under Part IVD of the Competition and Consumer Act 2010.
hinktank / we / us	Think Tank Group Pty Ltd ABN 75 117 819 084, Australian Credit Licence 564080.