Thinktank Privacy and Credit Reporting Policy

Thinktank Group of Companies

(“TTG” or “Thinktank”)

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Thinktank Privacy and Credit Reporting Policy – V1.6

Document Control

VERSION NUMBER:	1.6
SUBJECT:	Privacy and Credit Reporting
OBJECTIVE:	The objective of this policy is to ensure that personal and credit information is collected, used, stored and disclosed lawfully, securely and transparently, in accordance with applicable privacy and credit reporting obligations. It also establishes requirements for protecting customer information and managing requests to access or correct personal information.
REVIEWERS:	Senior Compliance Manager
OWNER:	Head of Risk and Compliance
APPROVER:	Audit, Finance and Risk Committee

Table of Revision

Version	Date	Reason for modification	Person Responsible
V1.5	09/02/2023	Approved Document	ARC
V1.6	27/11/2025	Revise collection details and clarify reportable conduct definition.	Andre Parra (Senior Compliance Manager)
V1.6	25/08/2026	Approved Document	ARC

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Overview

This policy sets out how Think Tank Group Pty Ltd ABN 75 117 819 084 and Think Tank Nominees Pty Ltd ACN 63 133 763 452 deal with your personal information including credit related personal information. A reference to "We" or "us" in this policy includes Think Tank Group Pty Ltd and Think Tank Nominees Pty Ltd and all or any of their related bodies corporate. It applies to us in our capacity as loan originator and servicer of loans as well as in our capacity as trustee, administrator and investments manager of the various trusts to which we are a trustee or service provider as well as in our personal capacity.

In this policy "Credit Providers" means us as well as any introducer, dealer or broker referred to in a loan application, any person assisting in processing a loan application and other entities involved in the funding, loan servicing or securitisation of loans including BNY Trust Company of Australia Limited.

We are committed to compliance with the Privacy Act 1988 (Cth) (Privacy Act), the Privacy (Credit Reporting) Code and the Australian Privacy Principles This policy contains information about how we look after your personal information generally as well as specific details as to how we look after your credit-related personal information.

1 Personal Information

Personal information is information or opinion whether true or not and whether recorded in a material form or not about an individual whose identity is apparent or can be reasonably ascertained from information or opinion e.g., name, contact details, tax file number, employment information, investment information etc. It includes credit related personal information.

2 What is credit-related personal information?

Credit-related personal information is credit information, credit eligibility information and related information. Credit information relates to your credit and includes;

- identification details;
- consumer credit liability information;
- loan repayment history information;
- a statement of information requested that has been made in relation to you by a credit provider, mortgage insurer or trade insurer or credit reporting body;
- the type of credit, amount of credit sought in an application that has been made by you to a credit provider;
- default information about you;
- payment information about you;
- new arrangement information about you;

- personal solvency information about you;
- publicly available information about including past and present company directorships and share and business ownerships;
- court proceedings information; and/or
- serious credit infringements.

Credit eligibility information means credit reporting information about an individual that has been obtained from a credit reporting body or information that has been derived from that information.

3 How do we collect personal information?

We generally collect personal information (including credit related personal information) via or in the course of applications for one of our products which may be submitted either directly to us through our website or by paper application, through one of our representatives or via an intermediary. We also receive personal information from third parties such as referees, employers, other credit providers, finance brokers, other third parties and credit reporting bodies as well as publicly available information from websites and social media.

4 What kind of information do we collect?

We will only collect personal information relevant to our business activities. This may include information received when an application is made for products or services or a request for information about our products or services is made, an application for a position with us is received or a response to a survey or feedback about our services is received.

To comply with our obligations under *Anti-Money Laundering and Counter-Terrorism Financing Act* 2006 (Cth) and other legislation, we are required to collect your personal information to confirm your identity.

Information we collect and store includes:

- names, gender and date of birth;
- addresses, phone numbers, email addresses;
- information regarding credit worthiness;
- financial information including credit history information in respect of credit provided by us or other credit providers;
- other information about your credit worthiness or suitability to be a guarantor including credit scores;
- information about overdue credit facilities or other infringements;
- investment information;
- bank account details;
- employment details and history;
- family details;

- communications between us and your representatives;
- information about credit related court proceedings and personal insolvency information;
- if you are an investor in any of our trusts your investor contribution and investment choice.

Sensitive Information: We may, in limited and infrequent circumstances, request health information where it is reasonably necessary to assess or support a financial hardship application or where required or authorised by law. The provision of this information is not mandatory, and you may clearly decline to provide it. We will not use your health information for purposes beyond those for which it was collected without your further consent.

Children's Data: Our products and services are not directed at individuals under 18 years of age. We do not knowingly collect personal information from minors without verifiable parental or guardian consent. If you believe we have inadvertently collected information from a minor, please contact our Compliance Officer immediately.

Tax File Numbers: If you invest in one of our investment trusts through Thinktank Asset Management, we may collect your tax file number (TFN). We collect this information to meet our reporting obligations to the Australian Taxation Office (ATO) in relation to investment income and distributions. We handle TFN information in accordance with the *Privacy (Tax File Number) Rule 2015* and the *Privacy Act 1988* (Cth), using and disclosing it only for purposes authorised by taxation, superannuation or personal assistance law. We will not use your TFN to confirm your identity or for any other unauthorised purpose.

5 How do we use personal information?

We use personal information to:

- assist you with queries;
- comply with legal or regulatory obligations imposed upon us;
- processing applications for products and services;
- managing loans or other products provided to you including management of overdue loan payments;
- managing customer relationships including product development feedback or other surveys, statistical or research purposes;
- investigation of complaints;
- participate in the credit reporting system and provide information to credit reporting bodies and assist other credit providers;
- if you are an investor, check your eligibility to invest in any of our trusts, processing your investment application, managing your investment and providing you with information regarding your investment, administering any tax requirements including reporting and withholding (if applicable);
- internal operations including securitisation, audits, record-keeping, file reviews and portfolio analysis; and

- fraud prevention measures or for a purpose disclosed to you where we have obtained your consent.

Our use of your personal information may involve disclosure of it to organisations that carry out functions on our behalf or otherwise. This includes legal, financial and other professional advisers, valuers, introducers, debt collection agencies, mortgage insurers, trade insurers, loan processing, organisations and loan management organisations, entities involved in the funding, loan servicing or securitisation of your loan including without limitation BNY Mellon Australia, credit reporting agencies including without limitation the credit reporting bodies referred to below, information technology providers, potential or actual purchasers of all or part of our loan book or other assignees and government authorities including law enforcement agencies.

We may also give guarantors, mortgagors or joint borrowers or a person who is considering becoming a guarantor, mortgagor or joint borrower information about you for the purpose of enabling that person to decide whether to be a guarantor, mortgagor or joint borrower informed about the conduct of the relevant loan.

6 What are credit reporting bodies?

Credit reporting bodies are bodies that collect information about individuals give reports to credit providers about their credit activities to assist credit providers in deciding whether to provide finance. If you apply for credit or agree to be a guarantor or are a director of a company that applies for credit or agrees to become a guarantor, we may disclose your information to a credit reporting body or collect information from a credit reporting body. We currently use the following credit reporting bodies:

Equifax
PO Box 964,
North Sydney NSW T: 1300 762 207
www.mycreditfile.com.au

Illion
PO Box 7405,
St Kilda Melbourne;
T: 1300734806
www.illion.com.au/#illion-for-individuals

Experian
PO Box 1969
North Sydney
T:1300 783 684
www.experian.com.au/consumer-services

You have the right to:

- access information about you held by a credit reporting body;
- ask a credit reporting body to correct information about you that is incorrect.
- request that a credit reporting body not use information about you for pre-screening or marketing by us or other credit providers; and

- request that a credit reporting body not use or disclose your credit reporting information if you have reasonable grounds to believe that you are or are likely to be a victim of fraud.

Each credit reporting body has a policy about how it manages credit related personal information. You may access this policy by contacting them using the details set out above.

7 How will we use credit-related information?

We may collect, hold, use and disclose your credit-related information in order to assess and process applications for credit, manage loans including collecting overdue payments, managing our relationship with you including product development, feedback or other surveys, statistical research purposes, investigation of complaints, assess or assist with hardship requests, compliance with regulatory requirements including the *Anti-Money Laundering and Counter-Terrorism Financing* Act 2006 (Cth) and other legislation, internal operations including securitisation audit, record-keeping, file reviews and portfolio analysis or on transfer of loans to other parties, for purposes otherwise permitted by law or for any purpose disclosed to you where we have obtained your consent, fraud prevention measures, dealing with complaints.

We may obtain credit-related information from you from a credit reporting body to assist us in managing your credit including in assessing loan applications, collection of overdue payments and for securitisation purposes.

We may disclose your credit-related information to credit reporting bodies including disclosure that you are in default under a credit agreement or have committed a serious credit infringement if this is the case.

Credit reporting bodies may include information provided by us in reports provided to other credit providers to assist them in assessing your credit worthiness.

8 Disclosure to overseas recipients

Our business is operated only in Australia. However, in some cases your personal information may be disclosed to organisations overseas including without limitation the United States, countries in the European Union and India. Where we disclose personal information to overseas recipients, we take reasonable steps to ensure those recipients handle your information in a manner consistent with the Australian Privacy Principles (APP 8.1), including through contractual obligations or other binding arrangements.

Please be aware that overseas organisations may be required to disclose information shared with them under applicable foreign laws, and we may not be in a position to prevent such disclosure.

9 Accessing your Information and Correction of your Information

You can request access to your personal information at any time by contacting Think Tank's Compliance Officer, details of which are set out at the end of this statement. We will acknowledge your access request within 5 business days and provide a substantive response within 30 calendar days of receipt. If we are going to refuse to give you access to your personal information, we must provide reasons for refusal and details of the relevant provision of the *Privacy Act* which entitles us to refuse access.

We will also take reasonable steps to amend or correct your personal information if you advise us that the information that we hold is inaccurate. Where we correct information, we will notify any third party to whom the information was disclosed where it is practicable and reasonable to do so.

10 Data Retention

We retain your personal information only for as long as is necessary for the purposes for which it was collected, or as required by applicable law.

When your information is no longer required, we will take reasonable steps to securely destroy or permanently de-identify it in accordance with Australian standards.

11 Storage of Personal Information

We may store your information using cloud-based systems and other electronic or networked storage solutions. We take reasonable steps to ensure that appropriate security measures are in place to protect your information from misuse, interference, loss, and unauthorised access, modification, or disclosure.

These measures include:

- Encryption of data both in transit and at rest
- Role-based access controls to limit access to authorised personnel only
- Regular security assessments and penetration testing
- Due diligence and ongoing monitoring of third-party service providers

Due to the nature of cloud and electronic storage, your personal information may be accessed or stored in multiple jurisdictions. As a result, it may not always be practicable to know the exact location where your information is held or accessed at any given time.

12 Website Cookies & Digital Tracking

Our website may use cookies, web beacons, and similar tracking technologies to enhance user experience and collect analytics data to improve our services.

You can manage or disable cookies through your browser settings; however, please note that doing so may impact the functionality and performance of certain parts of the website.

For more detailed information, please refer to our **Website Privacy & Cookie Notice**, available at: **www.thinktank.net.au**

13 Data Breach Notification

We take the security of your personal information seriously. In the event of an eligible data breach - being a breach that is likely to result in serious harm to one or more individuals - we will, in accordance with Part IIIC of the Privacy Act 1988 (Cth) (Notifiable Data Breaches scheme):

- contain and assess the breach promptly upon becoming aware of it;

- notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable, and in any event within 30 days of becoming aware of a suspected eligible breach;
- provide details of the nature of the breach and guidance on steps individuals can take to protect themselves; and
- take remedial action to prevent recurrence.

For more information about the Notifiable Data Breaches scheme, visit www.oaic.gov.au.

14 Credit Providers

If you have signed a privacy consent form you will be taken to have also authorised any Credit Providers who have an interest in your loan or any loan where you are a guarantor, mortgagor or joint borrower to, collect, hold and use your information in the manner specified in this policy.

15 Restricting Disclosure for Pre-Screening for Direct Marketing or in the case of Fraud

Credit reporting bodies offer a service to credit providers who wish to send direct marketing material about credit services to individuals. You have a right to request that a credit reporting body not use information about you for pre-screening or marketing by us or other credit providers. If you wish to do this you can contact the credit reporting body and request this, using the contact details set out above.

Also, you have the right to request that a credit reporting body not use or disclose your credit reporting information if you have reasonable grounds to believe that you are or are likely to be a victim of fraud.

16 Contacting us or making complaints

If you have any questions about this policy, how we manage your personal information or concerns about the way we manage your personal information you can contact us as follows:

The Compliance Officer
Think Tank Group Pty Ltd
PO Box 6125
NORTH SYDNEY NSW 2059
Telephone: 1300 781 043
Email: compliance@thinktank.net.au

If you are not satisfied with how a complaint or concern has been addressed by us, you can refer your complaint to the Australian Financial Complaints Authority - contact details set out below:

Australian Financial Complaints Authority
Website: www.afca.org.au
Email: :info@afca.org.au
Telephone: 1800 931 678
Mail: GPO Box 3 Melbourne VIC 3001

You can also refer your complaint or concern to the Office of the Australian Privacy Commissioner - contact details set out below:

Office of the Australian Privacy Commissioner
Website: www.oaic.gov.au
Email: enquiries@oaic.gov.au
Telephone: 1300 363 992
Mail: GPO Box 5218, Sydney NSW 2001

17 Review and Maintenance

This policy and methodology will undergo a formal review at least annually to ensure its continued relevance, effectiveness, and alignment with legislative, regulatory, and strategic requirements. The Risk and Compliance is responsible for coordinating the review process, with recommendations for updates submitted to the approving governance body for consideration and endorsement.

A periodic review does not necessarily result in changes to this Policy. Where amendments are made, the updated version of the Policy will be published on the company's website and/or communicated through appropriate internal governance channels.