



Credit Guide and Privacy Statement

Purple Circle Financial Services Pty Ltd
ACN: **611 305 170** Australian Credit Licence No.: **486112**

Introduction

This Credit Guide (CG) provides you with important information about Purple Circle Financial Services Pty Ltd (PCFS) and its Credit Representatives, who may provide you with credit services described in the CG.

As well as giving you important information that will help you decide if you want to use any of these services, it provides important information about:

- who we (PCFS and our Representatives) are,
- the credit services we offer to help you evaluate and make an informed decision about whether to use the services described in this CG,
- the remuneration that we and relevant persons receive for the services,
- any arrangements which may influence our services to you,
- our Privacy Statement, and
- how we handle your complaints if you are not satisfied with the services provided.

About us (“we”, “us”, “our”)

Licensee:

PCFS holds an Australian Credit Licence No. 486112 issued by the Australian Securities and Investment Commission (ASIC). We conduct business through a network of finance brokers who are appointed as Credit Representatives under our Licence. PCFS is responsible for the advice and conduct of your finance broker as set out in this CG.

Broker Group:

PCFS has a broker arrangement in place with Beagle Finance Pty Ltd trading as LoanKit (“broker group”), ACN 140 290 268, Australian Credit Licence No. 383640. We obtain mortgage aggregation services from the broker group.

Credit Representative:

A “Credit Representative” is a person who has been authorized by a credit licensee (PCFS) to engage in specified credit activities on our behalf.

Credit Rep Name:	Darryl Mutch
Credit Rep No.:	450051
Corporate Rep Name:	Mutch Financial Services
ACN:	166646582
Corporate Credit Rep No.:	450050

Our Contact Details

You can contact PCFS at:

Address: Suite 9/643 Newcastle Street, Leederville, WA, 6007
Phone: 1300 366 406
email: enquiries@purplecfs.com.au
Website: www.purplecfs.com.au

You can contact our Credit Representative at:

Address: 23 Hunter St Sydney NSW 2000
Phone: 0414758359
email: darryl@mutch.com.au
Website: www.mutch.com.au

Credit Assistance

Our Credit Representative is authorised to engage in credit activities including providing credit assistance on behalf of PCFS. They can provide you with the following Credit Assistance:

- give you information about loan/lease products or related services;
- consider whether you are eligible for a loan or lease or any related service you requested;
- suggest a suitable credit contract, an increase to your credit limit and/or that you retain your existing credit contract;
- assist you to apply for a credit contract or an increase in your credit limit;
- recommend a suitable consumer lease or to retain your existing consumer lease;
- assist you to apply for a consumer lease.

Our Responsible Lending obligations to you

We are obliged to ensure that any loan or increase to a loan we help you to obtain or any lease we help you enter is not unsuitable for you. To decide this, we will need to ask you some questions in order to assess whether the loan or lease is not unsuitable.

To make this assessment, we must make reasonable enquiries about your objectives and requirements and for the credit contract or credit limit increase. We must also make reasonable enquiries about your financial situation and take reasonable steps to verify this information.

It is important that the information you provide us is accurate, complete and up to date, as if we proceed on incomplete or incorrect information, you may be in breach of your legal obligations to the lender.

We will not be able to give you Credit Assistance if our assessment shows that:

- you will not be able to meet the proposed repayments without substantial hardship, or
- the loan or lease will not meet your objectives and/or requirements.

We will prepare a written **Preliminary Assessment**. You can ask us for a copy of our assessment any time up to 7 years after we provide you with Credit Assistance. To request a copy please contact us.

We will provide you with a copy:

- within 7 business days after the day we receive your request, provided you make the request within 2 years of the date of the Preliminary Assessment; or otherwise
- within 21 business days after the day we receive your request.

We have an obligation under the *Anti-Money Laundering and Counter Terrorism Finance Act 2006* to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passport and

driver licence. We will also retain copies of this information. We cannot provide you with Credit Assistance if you are unwilling to provide this information.

Lenders and Lessors

Subject to meeting credit criteria, we will be able to assist you to obtain loans and leases from a broad range of lenders and lessors through our broker group.

The following are the lenders or lessors with which PCFS conducted the most business during 2018/2019:

1. ANZ Bank
2. ING Direct
3. National Australia Bank
4. Westpac
5. Myloan
6. ME Bank

The following are the lenders or lessors with which the Credit Representative conducted the most business during 2018/2019:

1. ANZ
2. AMP Bank
3. Citibank
4. CBA
5. ING Direct
6. St George

Or, for those Credit Representatives that commenced since 1 July 2019, insert above the following:

The Credit Representative commenced with PCFS during the current financial year so is unable to provide information in respect of the previous year.

Our Fees

We may charge a fee for providing Credit Assistance. More detail about those fees will be set out in a **Credit Quote** we will give to you before we provide you with Credit Assistance.

Other Fees and Charges

You may be charged a lender's application fee, valuation fees and other fees associated with the loan or lease. These fees are not charged by PCFS or our Credit Representative. You should review the disclosure documents and your loan contract or lease for further details of any such fees and charges.

Commissions

PCFS has appointed a broker group as our agent to receive commissions from lenders and lessors and to pay PCFS commission in relation to loan contracts or leases for which we act as a Credit Representative and provide Credit Assistance. The total amount of commission PCFS may receive in relation to your loan or lease may vary depending on the lender or lessor, the term, the features, the amount of the loan or lease you ultimately choose and the amount and timing of the repayments that you make. Some or all of a commission payment received by PCFS may be paid to our Credit Representatives.

Loan contracts such as home loans, investment property loans

Upfront commission payable by lenders in relation to loans is calculated as a percentage of the loan amount and is generally in the range of 0.5% and 1% of the loan amount. It is usually paid after settlement of the loan.

Trail commission payable by lenders in relation to loans is generally calculated regularly (monthly, quarterly, bi-monthly or annually) on the outstanding loan balance and is paid in arrears. The trail commission payable by lenders is generally in the range of 0% per annum and 0.30% per annum of the outstanding loan amount.

Personal Loans

Upfront commission payable by lenders in relation to personal loans is calculated as a percentage of the loan amount and is generally in the range of between 1.65% and 2.75% of the loan amount. It is usually paid after settlement of the loan.

No trail commission is payable by lenders in relation to personal loans.

Leases

Upfront commission payable by lessors in relation to leases is calculated as a percentage of the lease amount and is generally in the range of 0.5% and 4% of the lease amount. It is usually paid after settlement of the lease. Trail commission is generally not payable in relation to leases.

Further details of the commission earned by us will be included in the **Credit Proposal** disclosure document we will provide to you at the same time as we provide you with Credit Assistance.

You can request information from us about the fees or commission that we are likely to receive, how they are calculated, and our reasonable estimate of the fees or commissions that will be payable.

Volume Bonus Arrangements

From time to time PCFS, our Credit Representatives (or our broker group) may receive a benefit, directly by way of cash bonus or additional commissions or indirectly by way of training, professional development days or sponsorship, if we or our broker group write a particular volume of loans offered by those lenders.

Referral Fees

We may pay a referral fee (i.e. commission) for third party referrals. An example of a referrer would be a real estate agent, financial planner, accountant or solicitor. This fee is not payable by you.

Further information about referral fees, including our reasonable estimate of the amount of any fees payable and how it is calculated is available from us on request and will be included in the Credit Proposal disclosure document we will supply to you when we provide you with Credit Assistance.

PCFS and our Credit Representatives may also receive a benefit for referring you to other specialist service providers. We will disclose this to you at the time we make the referral.

Ownership

The broker group provides services at arm's-length to our business which include IT systems, loan information and lodgement systems, training and development, commission processing, conferences and professional development events, and assistance with regulatory and compliance obligations. In consideration of the services the broker group gives us, we pay fees to the broker group or the broker group retains some of the commission panel lenders pay on loans we arrange.

Our business is owned and managed independently from the broker group.

Our Dispute Resolution procedures

We are committed to providing you with the best possible service. If, at any time, we have not met our obligations, or you have a complaint about any of our services, please inform us so we can work towards a resolution. We will endeavour to deal with your complaint promptly, thoroughly and fairly.

If you have a complaint, try to resolve this first with our Credit Representative. If you are unable to resolve your complaint within five (5) business days, you can contact the PCFS Complaints Manager using any of the following methods.

In writing: Suite 9/643 Newcastle Street, Leederville, WA, 6007
Phone: 1300 366 406
email: compliance@purplecfs.com.au

We may ask for additional information and request you to put your complaint in writing to ensure your issue is properly investigated. In cases where your complaint will take longer to resolve, we will update you progressively.

Our Complaints Manager will acknowledge receipt of your complaint within five (5) business days. If unable to resolve the complaint/dispute to your satisfaction within five (5) business days, they will write to you advising the procedures we will follow in investigating and handling your complaint.

Within 45 calendar days from the date you lodged the complaint with us, we will write to you advising you the outcome of the investigation and the reason/s for our decision, or if required, we will inform you if more time is needed to complete the investigation.

Third Party Products or Services

If your complaint relates to a product or service acquired through a third party (for example, a lender) we may ask you to contact the relevant third party. It will deal with your complaint under its complaints resolution process.

If you are not satisfied with the resolution of your complaint by the third party under its complaints resolution process, you are entitled to have your dispute considered by its External Dispute Resolution Scheme. Please contact the third party for further details.

External Dispute Resolution Scheme

If you do not think we have resolved your complaint to your satisfaction, you may take the matter – free of charge – to our External Disputes Resolution Scheme (provided it is within the scheme's terms of reference) as detailed below, but if our internal process is still in progress, it may request that our internal processes be complete before considering the matter further.

Our external dispute resolution service provider is the Australian Financial Complaints Authority which can be contacted via:

Telephone:	1800 931 678 (free call)
Website:	http://www.afca.org.au
Mail Address:	GPO Box 3, Melbourne, VIC 3001
Fax:	03 9613 6399

Privacy Statement

We need to collect personal information about you to provide you with our broking and related credit services. This privacy statement tells you how we collect your information, what we use the information for and with whom we share the information. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection. In certain circumstances, we may also be required to collect sensitive information (such as health information) on behalf of the lender in the course of giving you credit assistance.

How information is collected from you

We will collect your information from you directly whenever we can, like from enquiries we make of you when you seek credit assistance from us. We may verify that information from sources referred to in the responses to those enquiries or in this privacy statement.

How information is collected from other sources

Sometimes we will collect information about you from other sources as the *Privacy Act 1988* permits.

We will do this only if it is reasonably necessary to do so, for example, where:

- we collect information from third parties about a loan or lease in relation to which you seek our services;
- we cannot get hold of you and we rely on public information to update your contact details; or
- we exchange information with your legal or financial adviser or other representatives.

When the law authorises or requires collection of information

We may use your information for purposes including:

- giving you Credit Assistance;
- giving you information about loan products or related services;
- considering whether you are eligible for a loan or lease or any related service you requested;
- assisting you to prepare an application for a lease or a loan;
- administering services we provide, for example, to answer requests or deal with complaints;
- identifying you;
- telling you about other products or services we make available and that may be of interest to you, unless you tell us not to;
- telling you about other suppliers, with whom we have arrangements, that supply goods or services that may be of interest to you;
- allowing us to run our business efficiently and perform general administrative tasks;
- preventing or investigating any fraud or crime or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- any purpose to which you have consented.

You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will process your request as soon as practicable.

What happens if you do not provide information?

If you do not provide your information to us, it may not be possible to:

- assist in finding a loan or lease relevant to your circumstances;
- verify your identity or protect against fraud; or
- let you know about products or services that might be suitable for your financial needs.

Sharing Your Information

General

We may use and share your information with other organisations for any purpose described above.

Sharing with your representatives and referees

We may share your information with:

- your representative or any person acting on your behalf (for example, lawyers, settlement agents, accountants or real estate agents); and
- your referees, like your employer, to confirm details about you.

Sharing with third parties

We may share your information with third parties in relation to services we provide to you or goods or services in which we reasonably consider you may be interested. Those third parties may include:

- the broker group through which we may submit loan or lease applications to lenders or lessors on the broker group's panel. You can view our broker group's privacy notice at <http://www.loankit.com.au/about-us/privacy-policy/>. It sets out how that broker group manages your personal information and where you can find its privacy policy;
- our Licensee;
- referrers that referred your business to us;
- financial services suppliers with whom we have arrangements;

- valuers;
- lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries;
- organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;
- Government or regulatory bodies as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- guarantors and prospective guarantors of your loan or lease;
- service providers, agents, contractors and advisers that assist us to conduct our business for purposes including, without limitation, storing or analysing information;
- any organisation that wishes to take an interest in our business or assets; and
- any third party to which you consent to us sharing your information.

Sharing outside of Australia

We are not likely to disclose your information to organisations overseas. However, we may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held.

Information about other people

If you give information to us about another person (like your co-applicant) in relation to the services we provide, you will let that other person know that:

- we have collected their information to provide those services or for any other purpose set out in this privacy notice;
- we may exchange this information with other organisations set out in this privacy notice;
- we handle their personal information in the way set out in our Privacy Policy and this privacy notice and they can:
 - access or request a copy of that privacy policy or this privacy statement; or
 - access the information we hold about that other person,
- by using our contact details above; and
- we may not be able to provide those services to you unless we obtain their information.

Feedback on the handling of your personal information

Should you be dissatisfied with the manner in which the Credit Representative has handled your personal information, please contact us on the details listed above. We will take all necessary steps to investigate and address your concerns. If the issue you have raised is not resolved to your satisfaction, you should contact the Office of the Australian Information Commissioner at:

Telephone: 1300 363 992
 email: enquiries@oaic.gov.au
 Mail address: GPO Box 5218, SYDNEY, NSW 2001

You can obtain a copy of our full Privacy Policy by contacting us using the details above. You can learn more about the Privacy Act and your rights at <http://www.privacy.gov.au>

Privacy Policy

You can find out more about how we manage your information by reading our Privacy Policy available by contacting us. Please see our contact details above. Also, you can read and obtain a copy of PCFS's Privacy Policy at the website address set out above. Our Privacy Policy sets out how you can ask us to access and seek to correct information we hold about you and how you may complain against us about a privacy issue.



Privacy Policy

Purple Circle Financial Services Pty Ltd
ACN: **611 305 170** Australian Credit Licence No.: **486112**

Privacy Policy

This Policy applies to Purple Circle Financial Services Pty Ltd (Purple Circle) and all our Credit Representatives and their staff. The privacy of your personal information is important to us. We are committed to respecting your right to privacy and protecting your personal information. We are bound by the Australian Privacy Principles in the *Privacy Act 1988*. Our staff and Representatives are trained to respect your privacy in accordance with our standards, policies and procedures.

About this Privacy Policy

This Privacy Policy outlines how we manage your personal information. It also describes generally the sorts of personal information held and for what purposes, and how that information is collected, held, used and disclosed. Our Privacy Policy applies to all your dealings with us, our website and our Representatives.

We receive services to support the broking services we give you. We receive mortgage aggregation services from Finsure Aggregation Services. Sometimes it collects personal information about customers to manage customer enquiries or complaints, commission payments or file reviews. If you want to find out how it manages your personal information, please click on the link below:

<https://www.finsure.com.au/privacy-policy>

If you have any questions about this, please do not hesitate to contact us.

Collecting your personal information

Credit Services

As a credit service provider, we are subject to certain legislative and regulatory requirements under the *National Consumer Credit Protection Act 2009* and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. These require us to obtain personal information about you including (but not limited to):

- your name, contact details, date of birth;
- length of time at your current address;
- information regarding your dependents and cohabitants;
- your occupation and employment history;
- your bank accounts;
- assets and existing finance; and
- proof of earnings, expenses and identity.

How your personal information is collected

We collect personal information directly from you whenever we can, like from enquiries we make of you when you seek our advice. We may verify that information from sources referred to in the responses to those enquiries or in this Privacy Policy.

Sometimes we will collect information about you from other sources as the *Privacy Act 1988* permits. We will do this only if it is reasonably necessary to do so, for example, where:

- we collect information from third parties about a loan or lease in relation to which you seek our services; or
- we exchange information with your legal or accounting or other representatives.

You have the right to refuse us authorisation to collect such information from a third party.

If you give us information about another person (like your co-applicant) in relation to the services we provide, we require that you let that other person know that you have provided their personal information and direct them to our website for a copy of this Privacy Policy.

Credit Information

You can appoint us as your agent and authorise us to obtain your credit information (including both consumer and commercial credit reporting and eligibility information) from a credit reporting body on your behalf. You can also authorise us to use that information to assist us to provide you with credit assistance.

Sensitive information

We will collect sensitive information about you only with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

We will collect only sensitive information that is reasonably necessary for us to perform our functions or activities in advising and dealing with you.

Unsolicited personal information

We do not usually collect unsolicited personal information. Where we receive unsolicited personal information, we will determine whether it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we will destroy or de-identify that personal information as soon as practicable.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you make general enquiries about financial advisers near to your location, interest rates or current lender promotional offers.

Using your personal information

Credit Services

We collect your personal information for the purpose of providing you with credit services such as:

- giving you information about loan/lease products or related services;
- considering whether you are eligible for a loan or lease or any related service you requested;
- recommending a suitable credit contract, an increase to your credit limit and/or that you retain your existing credit contract;
- assisting you to apply for a credit contract or an increase in your credit limit;
- recommending a suitable consumer lease or to retain your existing consumer lease;
- assisting you to apply for a consumer lease;
- to verify your identity.

We may use your personal information to tell you about other service providers, with whom we have arrangements, that supply goods or services that may be of interest to you.

We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. If you do not wish to receive information relating to other products and services, please contact us at any time.

If you apply to become a Representative or apply for employment with us, we will collect information about you to assist us to decide whether to appoint you.

We collect payment information in order to process your payments.

Disclosing your personal information

Credit Services

In order to provide you with credit services and to operate our business activities we will need to disclose your personal information to third parties. The organisations that we are likely to disclose information about you to include:

- our Representatives and their staff;
- the mortgage aggregator through whom we submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel;
- lenders and lessors;
- lender's mortgage insurers and other loan or lease intermediaries;
- anyone who represents you such as settlement agents, real estate agents, lawyers and accountants;
- valuers;
- your referees, like your employer, to confirm details about you;
- referrers that referred your business to us;
- guarantors and prospective guarantors of your loan or lease;
- to companies that provide information and infrastructure systems to us;
- agents, contractors, insurers, professional advisers and external service providers;
- Government and regulatory authorities and other organisations, as required or authorised by law such as under the *Anti-Money or Laundering and Courter Terrorism Financing Act 2006* or in accordance with a subpoena or summons issued by a court;
- associated businesses that may want to market products to you;
- to anyone, where you have provided us consent.

In certain circumstances we may need to collect your tax file, Medicare or pension card number. We do not use or disclose this information other than for the purpose it was collected, authorised by law or if you have asked us to disclose this information to a third party. We will never use a government identifier to identify you.

We may also disclose your personal information to any other organisation that may have or is considering having an interest in our business. For example, a potential purchaser/organisation involved in the proposed sale of our (or our Representatives) business for the purpose of due diligence, corporate re-organisation and transfer of all or part of the assets of our business. Disclosure will be made in confidence and it will be a condition that no personal information will be used or disclosed by them.

We may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

Where your personal information is disclosed, we will seek to ensure that the information is held, used or disclosed consistently with the Australian Privacy Principles.

Keeping your personal information accurate and current

We aim to make sure that the personal information we collect, use or disclose is accurate, complete and current. We will take reasonable steps to make sure this is the case. This way, we can provide you with better service. If you believe your personal information is not accurate, complete or current, please contact us. If we refuse to correct your personal information, we will provide you with our reasons within 30 days.

Protecting your personal information

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse and loss and unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements for our employees, contractors and external service providers;
- Representative standards and rules for document storage and systems access;
- security measures to ensure the physical security of personal information held on our premises and systems; and
- deleting, de-identifying or destroying your personal information when records are no longer required.

We may use cloud storage to store personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

Your privacy on the Internet

Our Website

We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place including the use of firewalls. User identifiers, passwords or other access codes may also be used to control access to your personal information.

Links to other sites

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

Cookies

We may use cookies on our website. Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time.

Gaining access to your personal information

You can gain access to your personal information. This is subject to some exceptions allowed by law.

We may refuse to provide you with access, such as where the information relates to existing or anticipated legal proceedings, if the request is vexatious or if the information is commercially sensitive. If access is refused, we will give you a notice explaining our decision to the extent practicable and your options to make a complaint.

We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information.

We will provide you access within 30 days if it is reasonable and practicable to do so, but in some circumstances, it may take longer (for example, if we need to contact other entities to properly investigate your request).

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Notifying you of certain data breaches

A data breach occurs when personal information held by us is lost or subjected to unauthorised access or disclosure. If we suspect or know of a data breach, we will take immediate steps to limit any further access or distribution of the affected personal information or the possible compromise of other information.

When we have reasonable grounds to believe that a data breach is likely to result in serious harm – for example identity theft, significant financial loss or threats to physical safety, we will notify individuals at likely risk as soon as practicable and make recommendations about the steps they should take in response to the data breach. We will also notify the Office of the Australian Information Commissioner.

Notifications will be made using our usual method of communicating with you such as by a telephone call, email, SMS, physical mail, social media post, or in-person conversation. If we are unable to contact you, (or your nominated intermediary) by any of the above methods we will publish a statement on the front page of our website and place a public notice on our reception desk.

Resolving your privacy concerns

If you have any issues you wish to raise with us or would like to discuss any issues about our Privacy Policy, please contact our Privacy Officer. Our Privacy Officer will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing within 30 days of the determination of our Privacy Officer. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner at www.oaic.gov.au Telephone 1300 363 992.

Contacting Us

Address: Suite 9, 643 Newcastle Street, Leederville WA 6007

Phone: 1300 366 406

email: enquiries@purplecfs.com.au

Website: www.purplecfs.com.au

Updates

We may review and amend this Privacy Policy from time to time to address changes to laws and to reflect our current operations and practices. You may obtain a copy of the current version on request.