

## ABOUT US ("we, us, our")

Name of Credit Representative

Joshua Wessels

Credit Representative Number

478409

Name of Finance Professional

Australian Credit Licence Number (ACL)

Licencee

Diversifi Pty Ltd ("licencee")  
Address: Unit 1, 342 Fitzgerald Street, North Perth WA 6006  
Tel: 08 9227 8577 Fax: 08 9227 9474

Australian Credit Licence Number (ACL)

364403

Broker Group

Pennley Pty Ltd (Choice) ("broker group")  
ACN 071 979 498

Credit Representative Number

392528

This document provides you with information relating to our activities and those of our credit representatives. It contains information about various fees and charges that may be payable by you to us, as well as about certain commissions we may receive from a licencee when we are acting as a credit representative, or we pay to certain third parties. It also contains information about what you should do if you have a complaint or dispute in connection with our services as a credit representative or licencee.

## WHAT IS A CREDIT REPRESENTATIVE?

A 'credit representative' is a person who has been authorised by a credit licencee to engage in specified credit activities on behalf of the licencee. Our licencee is Diversifi Pty Ltd.

## WHAT IS CREDIT ASSISTANCE?

We give you credit assistance when:

- We assist you to apply for a particular loan or lease;
- We suggest you apply for a particular loan or lease (or suggest you apply for an increase to an existing loan); or;
- We suggest you remain in your current loan or lease.

## THE ASSESSMENT WE NEED TO DO BEFORE GIVING YOU CREDIT ASSISTANCE

Before we provide credit assistance to you, we assess whether the particular loan or lease is suitable for you. To do this, we need to make reasonable inquiries and verify that:

- the loan or lease or increase will meet your requirements and objectives; and
- You can meet the proposed repayments.

We won't be able to give you credit assistance if our assessment shows that:

- you won't be able to meet the proposed repayments without substantial hardship; or
- The loan or lease won't meet your requirements or objectives.

## GETTING A COPY OF OUR ASSESSMENT

If we provide you with credit assistance, you can ask us for a copy of our assessment any time up to 7 years after we provide you with a credit assistance quote. 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 our credit assistance quote; or;
- Otherwise, within 21 business days after the day we receive your request.

## INFORMATION ABOUT THE LICENSEE AND ITS CREDIT REPRESENTATIVES AND TOP 6 LENDERS

We act as a credit representative or licensee for Diversifi Pty Ltd. We are authorised to engage in credit activities including providing credit assistance on its behalf.

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

The following are the lenders or lessors with whom I generally conduct the most business:

Macquarie	NAB
Bank of China	ANZ
Liberty Financial	Bankwest

## FEES & CHARGES

### FEES PAYABLE FOR THE PROVISION OF CREDIT ASSISTANCE

We charge a fee for providing credit assistance. More detail about those fees will be set out in a quote we will give to you before we provide you with credit assistance.

### OTHER FEES AND CHARGES

You may have to pay other fees and charges (such as application fees, valuation fees and other fees) to the lender, lessor or other parties. You should review the disclosure documents and your loan contract or lease for further details of any such fees and charges.

## COMMISSIONS

### COMMISSIONS WE RECEIVE FROM OUR LICENCEE

Our licensee has appointed our broker group as its agent to receive commissions from lenders and lessors and to pay us commission in relation to loan contracts or leases for which we act as a credit representative/licensee and provide credit assistance. The total amount of commission we 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.

### Loan Contracts such as Home Loans, Investment Property Loans and Personal Loans

Upfront commission payable by lenders in relation to loans is calculated as a percentage of the loan amount and is generally anywhere up to 1.75% 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 anywhere up to 0.385% per annum of the

outstanding loan amount.

## Leases

Upfront commission payable by lessors in relation to leases is calculated as a percentage of the lease amount and is generally anywhere up to 4.00% 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 that we are likely to receive, how those fees are calculated, and our reasonable estimate of the fees or commissions that will be payable.

## THIRD PARTY REFERRAL

If we introduce you or refer you to a third party i.e. Conveyancer/Settlement Agent, Financial Planner, General Insurance etc. we may be eligible for a commission or a fee.

## COMMISSIONS PAYABLE BY US

If a third party has introduced you to us or referred you to us, we may pay them a commission or a fee.

We obtain referrals from a range of sources, including real estate agents, accountants, financial planners or other people.

Further information about referral commissions, including our reasonable estimate of the amount of any commission payable and how it is calculated is available from us on request and will be included in the credit proposal disclosure we will supply to you when we provide you with our credit assistance.

## DISPUTES OR COMPLAINTS

### WHAT TO DO IF YOU HAVE A DISPUTE OR COMPLAINT?

We are committed to providing our customers 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.

## HOW TO MAKE A COMPLAINT AND THE COMPLAINTS PROCESS?

If we have a complaint, we request you follow these steps: First point of contact for a complaint:

### *Complaints Officer*

Tracey-Lea Gilbert

Director

Tel: (08) 9227 8577 or 0412 103 627.

*Then;*

Rose M De Rossi

Director

Tel: (08) 9227 8577 or 0411 181 938

1. The Complaints Officers are senior personnel in our organisation and have the necessary experience and authority to handle your

complaint and make relevant decisions on outcomes.

2. The complaint need not be in writing and may be presented to us by any reasonable means, for example letter, telephone, email or in person.
3. You can also contact us on/at:

Post: Unit 1, 342 Fitzgerald Street, North Perth WA 6006  
Phone: (08) 9227 8577 Fax: (08) 9227 9474 Email: [admin@diversifi.com.au](mailto:admin@diversifi.com.au)

### **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. They will deal with your complaint under their complaints resolution process.

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

### **KEEPING YOU INFORMED**

We will keep you informed of the progress and outcome of any complaints by way of electronic or postal advice.

### **STILL NOT SATISFIED?**

If you do not think we have resolved your complaint to your satisfaction, you may take the matter – free of charge – to the relevant External Disputes Resolution Scheme (provided it is within the scheme's terms of reference) as detailed below. You may also refer the matter to the relevant External Disputes Resolution Scheme at any time, but if our internal process is still in progress, they 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 (AFCA), which can be contacted at:

Australian Financial Complaints Authority (AFCA)

Website: [www.afca.org.au](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Telephone: 1800 931 678 (free call)  
In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3000

## Respecting your privacy

This privacy policy applies to you if you are an individual who is a client, or a guarantor or potential guarantor of the obligations of a client, of a mortgage broker (your mortgage broker) that:

- obtains or makes use of mortgage aggregation services provided by Pennley Pty Ltd ACN 071 979 498 as trustee for the Pennley Unit Trust (Choice Aggregation Services); or
- is a credit representative or a Broker or a Loan Writer that has applied to be appointed as a credit representative (each a “Credit Representative”) of BLSSA Pty Ltd ABN 69 117 651 760 (BLSSA),

or if you give us information in relation to any product or service administered by Choice Aggregation Services or BLSSA.

We respect your personal information, and this Privacy Policy explains how we handle it. The policy covers Choice Aggregation Services and BLSSA.

In this privacy policy, “we” or “us” means either of Choice Aggregation Services or BLSSA. Each of us is a member of the National Australia Bank Group (the Group) of companies.

## What personal information do we collect and hold?

### General information

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- credit information such as details relating to credit history, credit capacity and eligibility for credit; and
- other information we think is necessary relating to the services we provide to your mortgage broker or you.

## How do we collect your personal information?

### How we collect and hold your information

We might collect your information when you make a complaint about your mortgage broker or the products or services for which your mortgage broker assisted you or its client to apply.

Also, we might collect your information if you call us or use our websites.

### How we collect your information from other sources

Sometimes we collect information about you from other sources. We do this only if it’s necessary to do so. Instances of when we may need to include where:

- your mortgage broker gives us information about you in relation to your dealings with him or her or in an application for credit or other finance facilities; or
- the financial institution, that makes products or services available to you or the person whose obligations you guarantee, gives us your information in relation to managing commissions or requests they may have of us or your mortgage broker relating to those products or services.

### What if you don’t want to provide us with your personal information?

If you don’t provide your personal information to us, we may not be able to supply services to your mortgage broker appropriately and enable them to conduct their business efficiently.

### How we collect and hold your credit information

We will collect your credit information from details given to us by you, your mortgage broker or the

financial institution that makes products or services available to you or the person whose obligations you guarantee.

## What do we do when we get information we didn't ask for?

Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with information we obtain directly from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

## When will we notify you that we have received your information?

When we receive personal information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

## How do we take care of 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, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements of our employees;
- document storage security policies;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites.

For more information on our online security and how you can protect yourself online see <http://www.nab.com.au/personal/internet-banking/security>

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

## What happens when we no longer need your information?

We'll only keep your information for as long as we require it for our purposes. We're also required to keep some of your information for certain periods of time under law, such as the Corporations Act, for example. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

# How we use your personal information

## What are the main reasons we collect, hold and use your information?

We may use your information to:

- administer our relationship with your mortgage broker including monitoring compliance with credit law, answering requests and complaints and generally managing the services we provide; and
- answer requests made by financial institutions that make products or services available to you or the person whose obligations you guarantee.

## What are the other ways we use your information?

We may also use your personal information to:

- allow us to run our business and perform administrative and operational tasks, like:
  - training staff;
  - risk management;

- systems development and testing, including our websites and other online channels;
- undertaking planning, research and statistical analysis;
- preventing or investigating any fraud, crime or misconduct or any suspected fraud, crime or misconduct;
- as required by law, regulation or codes binding us;
- managing our relationships with financial institutions on our panel of financial institutions;
- investigating and dealing with suspected or actual unlawful activity; and
- for any purpose for which you have given your consent.

## Who do we share your personal information with?

To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others. We may share your information with other organisations and Group members for any purposes for which we may use your information.

Also, we may share your information with third parties in relation to services we provide to your mortgage broker or in relation to any of the purposes described above. Those third parties may include:

- your mortgage broker or any individual or company that employs or contracts with your mortgage broker;
- in the case of the Aggregator, BLSSA as the ACL holder that authorises the Aggregator to engage in credit activities;
- referrers that referred your business to your mortgage broker;
- lenders and financial services suppliers that have made products or services available to you;
- organisations, like fraud reporting agencies or industry associations, 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;
- service providers, agents, contractors and advisers that assist us to conduct our business;
- 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.

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's not always practicable to know in which country your information may be held

## How do you access your personal information?

### How you can generally access your information

We'll always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us in writing to access your personal information that we hold. In some cases we may be able to deal with your request over the phone.

We will give you access to your information in the form you want it where it's reasonable and practical (like a copy of a phone call you may have had with us – we can put it on a disk for you). We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first.

We're not always required to give you access to your personal information. Some of the situations where we don't have to give you access include when:

- we believe there is a threat to life or public safety;
- there is an unreasonable impact on other individuals;
- the request is frivolous;
- the information wouldn't be ordinarily accessible because of legal proceedings;
- it would prejudice negotiations with you;
- it would be unlawful;
- it would jeopardise taking action against serious misconduct by you;
- it would be likely to harm the activities of an enforcement body (e.g. the police); or
- it would harm the confidentiality of our commercial information.

If we can't provide your information in the way you've requested, we will tell you why in writing. If

you have concerns, you can complain. See 'Contact Us'.

## How do you correct your personal information?

### How we correct your information

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's:

- inaccurate;
- out-of-date;
- incomplete;
- irrelevant; or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

## How do you make a complaint?

### How do you generally make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us.

You can contact us by using the details below: Privacy Officer  
Diversifi Pty Ltd  
Tracey Lea Gilbert  
1/342 Fitzgerald Street, North Perth WA 6006  
P: 1300 55 99 49  
E: [tracey@diversifi.com.au](mailto:tracey@diversifi.com.au)

We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days. [Further Options](#)

### **Need more help?**

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:

- Online:** [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)
- Phone:** 1300 363 992
- Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- Fax:** +61 2 9284 9666
- Mail:** GPO Box 5218 Sydney NSW 2001 or GPO Box 2999 Canberra ACT 2601



# Contact Us

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by using the details below: Privacy Officer

Diversifi Pty Ltd  
Tracey Lea Gilbert  
1/342 Fitzgerald Street, North Perth WA 6006  
P: 1300 55 99 49  
E: tracey@diversifi.com.au

## What if you want to interact with us anonymously or use a pseudonym?

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way however as we are often governed by strict regulations that require us to know who we're dealing with. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable; or
- we are required or authorised by law or a court/tribunal order to deal with you personally.

## Changes to this Privacy Policy

This Policy may change. We will let you know of any changes to this Policy by posting a notification on our website at [www.choiceaggregation.com.au/privacy](http://www.choiceaggregation.com.au/privacy).

We need to collect personal information about you to provide you with our broking & related services. This privacy statement tells you how we collect your information, what we use the information for and who we share the information with. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

### 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's 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 can't get hold of you and we rely on public information to update your contact details; or
- we exchange information with your legal or financial advisers or other representatives.

### When the law authorises or requires collection of information

Some law may require us to collect personal information about you. For example, we may require your information to verify your identity under Australian Anti-Money Laundering law.

## How your information may be used

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;
- administering payments we receive, or any payments we make, relating to your loan or lease;
- 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.

## Personal information may be held overseas

"We may store information about you 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's not always practicable to know in which country information about you may be held."

## What happens if you don't provide information

If you don't 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 mortgage aggregator through whom we may submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel;
- the Australian Credit Licence holder that authorises us to engage in credit activities;
- 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;
- 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's not always practicable to know in which country your information may be held.

### **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 that policy at our 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.

### **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 notice; 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.