

# Privacy Policy

## Challenger Mortgage Management (CMM) Privacy Statement

CMM takes your privacy seriously and we apply privacy and security controls around the way we manage your personal information.

### Who are we?

Challenger Mortgage Management Pty Limited (CMM) ACN 087 271 109 Australian Credit License 391438. In this policy, “us”, “we” or “our” refers to CMM. CMM includes Challenger NZ HoldCo1 Limited (FSP1008483) CMM is a servicer of mortgages.

We understand how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information that you may provide to us. Our commitment in respect of personal information is to abide by the Privacy Act 1988 (Cth) in Australia, and the Privacy Act 2020 in New Zealand, and any other relevant law.

### Personal information

When we refer to personal information we mean information or an opinion about an identified individual, or an individual who is reasonably identifiable.

### Why we collect your personal information

CMM may collect, hold, use or disclose your personal information so that we can:

- Verify your identity;
- Provide you with our products and services;
- Administer and manage your loan facility
- Respond to queries, complaints or to provide customer service;
- Comply with relevant laws, regulations and court orders;
- Train our employees.

If CMM does not collect your personal information, we may not be able to provide you with a product or service.

The product or service that we are providing will determine what information we will collect about you.

The kinds of personal information that CMM may collect and hold about you may include: your name,

address, contact details, date of birth, citizenship, financial position, banking details and other identity-related information.

In addition, we may collect personal information about individuals who are business contacts of CMM.

Where sensitive information is collected, stored, used or transferred about you, we will only use this information if you have consented, or in the exercise or defense of a legal claim.

**We may collect your personal and sensitive information through a loan application, financial transactions and during the general operation of the loan.**

The personal information CMM may collect about you will depend on the circumstances of collection, including whether we collect the information from you as a customer, borrower, supplier, contractor, stakeholder or in some other capacity. Information may be collected when you contact us by telephone, email, completion of an application for a loan or investment in a fund, completion of a form, or through our website.

We may collect and receive personal information from our customers or from other business referrers in order to conduct our business or from other third parties such as:

- Your authorised representatives and advisor(s);
- Our service providers, including loan originators, trustees
- Your employer;
- Our corporate clients, where we are providing services to them;
- Your lawyer or other agents if you authorise us to do so.

We may receive your personal information from a 3rd party in the course of acquiring an existing loan portfolio from that party and/or where CMM is taking on the role of servicer for the respective loan portfolio. In such cases, we will work with the 3rd party to ensure that you are notified of the transfer of your information to CMM as soon as reasonably practicable. If the 3rd party has not notified you prior to the transfer, CMM will attempt to do this in writing within a reasonable period following the transfer.

**Cookies and Other Data Collection Technologies**

When CMM's website is visited we may collect certain transaction information by automated means, using technologies such as cookies and server logs. Cookies are small text files that websites send to computers or other Internet-connected devices to uniquely identify the browser or to store information or settings in the browser. Cookies allow CMM to recognise the computer when it is used to return.

They also help us provide a customised experience and enable us to detect certain kinds of fraud. Cookie preferences can be managed and the individual can opt out of having cookies and other data collection technologies used by adjusting the settings on their browser.

In many cases, the information CMM collects using cookies and other tools is only used in a non-identifiable way, without any reference to personal information. For example, CMM uses information it collects about all website users to optimise its website and to understand website traffic patterns. In some cases, CMM does associate the information it collects using cookies and other

technology with personal information. This Privacy Policy applies to the information when we associate it with the personal information.

### **Why do we collect repayment history information?**

We will collect repayment history information about you in relation to payments falling due on your loan facility. We can disclose this information to credit reporting bodies. Repayment history information includes information about when repayments are due and whether they have been made, but does not include the amount of repayments.

### **How safe and secure is your personal information that we hold?**

The security of your personal information is important to us and we will take reasonable steps to protect your personal information by storing it in a secure environment. When the information is no longer needed for any purpose for which the information may be used or disclosed, reasonable steps will be taken to destroy or de-identify the information.

We will also take reasonable steps to protect any personal information from misuse, loss, unauthorised access, modification or disclosure.

Access to personal information held by CMM is controlled to prevent misuse or unauthorised disclosure of the information.

### **To whom will we disclose your personal information?**

CMM does not sell, rent or trade personal information to, or with, third parties.

Where possible, we will inform you, at or before the time of collecting your personal information, the types of organisations that we intend to disclose your personal information to.

In some circumstances your information may be disclosed to CMM's related entities or service providers that perform a range of services on our behalf or are associated with the management of your loan facility, investment and related products and services.

Examples include:

- Organisations involved in providing, managing and administering products and services such as loan servicers, trustees, trust managers, custodians, fund and investment administrators/managers, external dispute resolution services;
- Mortgage intermediaries such as mortgage brokers, mortgage originators and mortgage managers;
- Professional service firms that provide services to us such as lawyers and auditors;
- Software providers such as our database licensors;
- Companies and contractors that provide IT services to us such as storage facilities;
- Credit reporting agencies;
- Lender's mortgage insurers;

- Registry and platform providers;
- Valuers;
- Collection agencies and other loan intermediaries;
- Mailing houses and printing companies; • Other consultants or advisers appointed by us.

We may also disclose your personal information to your employer/s or referees, your guarantors, your financial advisors, your bank and any other organisation that may have or is considering having an interest in your loan or investment, or in our business.

Where we disclose your information to our service providers, we will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by CMM.

We may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements.

We may also disclose your personal information to other third parties and for other purposes with your consent. That consent may be written, verbal or implied from your conduct.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case-by-case basis. Prior to disclosing any of your personal information to another organisation, we will take all reasonable steps to satisfy ourselves that the disclosure:

- Is for a purpose known to you or otherwise for a purpose you would reasonably expect;
- Is for a purpose required or permitted by law (for example, in response to a request or in response to a subpoena to a court or tribunal or to the Australian Taxation Office);
- Is otherwise for a purpose authorised by you, and
- Is to an organisation that has a commitment to protecting your personal information at least equal to our commitment.

### **Overseas transfer or access to personal information**

We are always looking to improve the way we deliver our products and services to you (as well as our supporting operational capability). Where appropriate, we seek to partner with leading service providers and leverage their recognised expertise. In some cases, our service providers have global operations. This means that, depending on the service being provided, your personal information may be used or accessed by the service provider from an overseas location. These arrangements are reviewed to obtain reasonable assurance that the third-party provider has appropriate security measures in place to protect personal information.

### **IT services outsourcing**

We have engaged a trusted and global third-party service provider to provide information technology services (including network and system support) across our business operations. In delivering the services, our partner will at

times access personal information of our employees and customers from an overseas location. However, access is only provided via secure login (supported by Multi-Factor Authentication) to a Challenger-controlled environment, where data is maintained on Australian-based servers.

### **Use of service providers**

We may contract out some of our administrative and support functions such as mailing, settlement services, IT support, product administration services, document and data storage, background checking, online identity validation or identity verification services to external service providers from time to time. Only information necessary for the service provider to carry out their function will be provided and will be subject to confidentiality clauses in the relevant services agreement.

### **Storage and security of information**

We store your personal information in a combination of hard copy and electronic records. These are held on our premises and systems as well as offsite using trusted third parties.

We may also utilise some 'Cloud-based applications and systems, where data may reside on servers located overseas.

We take reasonable steps to protect personal information from loss, interference or misuse, and unauthorised access, modification, or disclosure, such as:

- Training our staff on how to protect your personal information.
- When we engage third parties to handle or store data, we put in place arrangements to protect your information.
- When you access our login websites, we encrypt data sent from you to our systems to prevent unauthorised access.
- We use firewalls, intrusion detection and virus scanning tools to prevent viruses and third parties from accessing our systems.
- When we send your electronic data to another organisation, we use secure networks or encryption to protect it.
- We employ physical security measures, such as alarms, cameras, guards and other controls to prevent unauthorised access to our offices and storage facilities

Where personal information is no longer required to be retained, we will take such steps as are reasonable in the circumstances to de-identify the information CMM have or put it beyond use.

### **Accessing and updating your personal information**

It is important to our relationship that the personal information we hold about you is accurate and up to date. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete. You may contact us at any time by calling us on 1800 789 088 (Australia) or 0800 668 333, 0800 384 475 (New Zealand) or via email on [CMMenquiries@challenger.com.au](mailto:CMMenquiries@challenger.com.au) to request access to the personal information we hold about you. You may also ask us to correct information about you that you believe to be inaccurate, incorrect, or out of date.

You may request access to any of the personal information we hold about you at any time. We may charge a reasonable fee to cover our costs in retrieving and supplying the information to you.

We will need to verify your identity before giving you access or correcting your information.

There may be some situations where we are not able to correct or provide you with access to your personal information. In these circumstances an explanation will be provided to you to explain the reasons why.

### **Dealing with us anonymously**

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information.

### **Further enquiries or complaints**

You may request further information about the way we manage your personal information by writing or emailing.

#### **Australia:**

Mail:

Privacy Officer  
CMM, GPO Box 3698, Sydney NSW 2001

Or by email: [CMMassist@challenger.com.au](mailto:CMMassist@challenger.com.au)

You can also contact us by telephoning 1800 789 088

If you believe that we have breached the Australian Privacy Principles by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are set out above.

The Privacy Officer will respond to your complaint within 30 days of its receipt.

In the event that the Privacy Officer is unable to resolve your complaint, you may apply to the Office of the Australian Information Commissioner (OAIC) or access the Australian Financial Complaints Authority (AFCA) an external dispute resolution service to have your complaint heard and determined. The Commissioner may be contacted on the privacy hotline 1300 363 992 and AFCA may be contacted on 1800 931 678.

#### **New Zealand:**

Mail:

Privacy Officer  
CMM, PO Box 914 Shortland Street, Auckland 1140

Or by email: [CMMassist@challenger.com.au](mailto:CMMassist@challenger.com.au)

You can also contact us by telephone on 0800 668 333 or 0800 384 475

If you believe that we have breached the Privacy Act 2020 New Zealand by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are set out above.

The Privacy Officer will respond to your complaint within 30 days of its receipt.

In the event that the Privacy Officer is unable to resolve your complaint, you may apply to the New Zealand Privacy Commissioner or access Financial Services Complaints Limited (FSCL) an external dispute resolution service to have your complaint heard and determined. The Commissioner may be contacted on 0800 803 909 and FSCL may be contacted on 0800 347 257.

### **Change in our Privacy Policy**

We may change this Privacy Policy from time to time or as the need arises (such as where there are changes to our business operations, relevant technology and privacy laws).