

Privacy Policy

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Contents

1. Introduction	3
2. Personal information we may collect.....	3
3. Why we collect your data.....	5
4. Use and disclosure of information.....	5
5. Processing your data	6
6. How we retain your data.....	7
7. Confidentiality.....	7
8. Third Party access to your information	8
9. Direct Marketing.....	9
10. Your Rights.....	9
11. Web Technology	11
12. Cookies.....	11
13. CCTV and Telephone.....	12
14. How to contact Islamic Money	12
15. Complaints.....	12

1. Introduction

Islamic Money Australia Pty Ltd (“Islamic Money”) has a legal duty to respect and protect any confidential information and personal information we collect from you and to use it for purposes you are aware of. We are bound by the Australian Privacy Principles of the *Privacy Act 1988* (Cth) (“Privacy Act”) in our handling of your personal information. We are also bound by Division 3 of Part IIIA of the Privacy Act, and the Credit (Finance) Reporting Privacy Code (CR Code) in our handling of your finance-related information

Islamic Money takes precautions to prevent unauthorised access and we do not divulge details collected from you as a visitor and/or customer to any third party unless:

- a) you give us your consent to do so;
- b) we are obliged to do so by law or court order; or
- c) as otherwise set out in terms of this Privacy Policy.

We use leading technologies to protect the security of your data and whenever we hire third parties to provide support services, we will require them to observe our privacy standards and to allow us to audit them for compliance.

Islamic Money is committed to protecting your privacy and to preserving the confidentiality of the information provided to us. Islamic Money has developed the following Privacy Policy. This Privacy Policy provides you with general information about how Islamic Money manage your personal information in accordance with the relevant Privacy Laws. It sets out our commitment to your privacy, the information which we may collect about you, what we use it for and your rights in relation to such information.

We have developed this policy because we want you to feel confident about the privacy and security of your personal information. Please read it carefully.

When you purchase a product or service from us you will also receive further information about our privacy practices in a Privacy Statement. The Privacy Statement will give you specific information about how we will manage your personal information for the particular product or service you acquire. We also have Electronic Terms of Use, which detail your use of our websites and other online interactions. Please refer to those terms prior to using our website.

2. Personal information we may collect

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. It includes sensitive information. We will ask for a broad range of personal information which is necessary for our functions or activities. The type of personal information we ask for may depend on the type of product or service you acquire.

If we are not able to collect personal information about you we may not be able to provide you with the products, services or assistance you require.

The information we may collect from you could include:

- Information about your identity – including your name, address, date of birth and gender;
- Identification documents such as driver's licence, passport, or Medicare card;
- Your tax residency status and related information such as your Tax File Number or Tax Identification Number;
- Socio-demographic information – for example your marital status, number of dependants, occupation, and nationality;
- Financial and transaction information, including insurance, financial, credit and/or bankruptcy history;
- When you visit our websites or use our mobile apps – your location information, IP address and any third party sites you may access. Some of this website information we collect using Cookies, we have detailed information about Cookies in Section 11, of this document;
- Call recordings – on occasion we monitor and record our calls with you - we let you know if we are doing this;
- When you access our mobile apps using a mobile device – any suspected malware detected on your device; and
- Other information, such as making a record of your interactions with us.

We collect your personal information:

- directly from you (for example, by using written forms, through contact over the telephone, mobile or other messaging technology, via the internet and/or in person-to-person contact)
- from publicly available sources of information; and/or
- from other persons or organisations (including related and third parties), such as:
 - Service providers
 - Agents
 - Advisers
 - Brokers
 - Employers

Companies or bodies that you own shares in or have an interest in.

For example, if you apply for finance, we may ask a finance reporting body for your finance history. The Privacy Act limits the information we can give to finance reporting bodies, and that they can give us. The Act also limits how we can use finance reports.

We may also collect information about you that is publicly available (for example, in public registers or on social media) or provided by businesses we deal with.

Sensitive information

The Privacy Act protects your sensitive information – such as information about your religion, ethnicity, health, image of your face or biometrics (for example, your fingerprints). If we need this type of information, we will ask for your permission – except where otherwise allowed by law.

3. Why we collect your data

Information about you may be put onto Islamic Money's database and used, analysed and assessed by Islamic Money to provide you with a better service. We only collect information that we believe to be relevant and required to better conduct our business and to provide our customers with better services and products.

We use the information that we collect about you in the following ways and for the following purposes:

- a) to identify you and conduct appropriate checks;
- b) to understand your requirements and provide you with a product or service;
- c) for the provision of information or other services in relation to any specific requests that you may make to us, and to give you statements;
- d) to set up, administer and manage our products and services, including obtaining loan assessments and credit reports;
- e) to service, maintain and administer accounts (for example, the updating of customer contact information);
- f) to manage complaints and disputes, and report to dispute resolution bodies;
- g) to satisfy specific legal obligations (for example, according to law, we may be required from time to time to disclose your information to Governmental bodies, agencies or our Regulators or recognised external authorities, but we will only do so under proper authority);
- h) for internal assessment and analysis;
- i) for research and statistics;
- j) for the detection and prevention of fraud and any other illegal acts or criminal activity which Islamic Money is bound to report and in line with our legal obligations including our anti-money laundering policy;
- k) to develop and improve Islamic Money's products and services;
- l) to manage, train and develop our employees and representatives; and
- m) to recover debts and to assist in debtor tracing.

Through the on-boarding process and when vetting applications, we may search external databases such as the electoral register, government databases, identity services and/or carry out identity checks. We may also request information on you from finance reference agencies, and use any of this information for identification purposes, debt tracing and the prevention of money laundering. The records will also be used for statistical analysis about finance, insurance, and fraud.

4. Use and disclosure of information

We use and disclose your personal information for the purposes we collected it, as outlined above.

We may also use and disclose your personal information for a secondary purpose related to a purpose for which we collected it. We may do this where you would reasonably expect us to use or disclose the information for that secondary purpose and either:

- if the information is sensitive information, the secondary purpose is directly related to the primary purpose of collection; or
- if the information is not sensitive information, the secondary purpose is related to the primary purpose of collection.

For example, we may disclose your personal information to third party service providers so that they can provide the contracted services to Islamic Money such as information technology support, hosting services or otherwise.

There may be other circumstances where we use and disclose your personal information, including where:

- you have expressly or impliedly consented to the use or disclosure;
- we reasonably believe that the use or disclosure is reasonably necessary for an enforcement activity;
- we are required or authorised by law to disclose your personal information, for example, to a court in response to a subpoena, or to the Australian Taxation Office, Centrelink and/or the Australian Transaction Reports and Analysis Centre (AUSTRAC).

We may send your personal information overseas and collect personal information from overseas. Instances where we will do this include:

- when you have asked us to do so or we have your consent;
- when we are authorised or required by law or a court/tribunal to do so;
- when we have outsourced a business activity or function to an overseas service provider; and
- for the purposes of certain electronic transactions.

Your personal information may be transferred to other countries, which may not have similar privacy or data protection laws, and may in certain circumstances compel the disclosure of personal information to a third party such as an overseas authority for the purpose of complying with foreign law or regulatory requirements.

We will only disclose personal information overseas to the extent that it is necessary to perform our functions or activities.

5. Processing your data

We store and process your data, including personal data to the extent that this is necessary for the appropriate conduct of our business relations and to conform to relevant statutory provisions. We only record information which serves to fulfil our duties and we do this solely within the scope of the service provided to you. In providing our services we collect, process and store data related to you from other institutions and other professionals.

6. How we retain your data

We hold your information on our systems electronically or offsite using trusted third parties. We take all reasonable steps to ensure that information we hold about you is protected from:

- misuse, interference and loss; and
- unauthorised access, disclosure or modification.

Your information is only accessible by you and those authorised to access it. Employees and third parties who deal with your information, are bound by confidentiality obligations and are required to complete training about information security.

When you transact with us on the internet via our website, we encrypt data sent from your computer to our systems. We have firewalls and virus scanning tools to protect unauthorised access. When we send electronic data, we use dedicated secure networks or encryption.

Email transmissions to us are not necessarily secure. If you have any concerns about the security of the contents of your email or any other transaction over the internet, then you should consider contacting us by other means.

When we no longer need your information, including when we are no longer legally obliged to keep records relating to you, we will destroy it or de-identify it.

7. Confidentiality

We are bound, in accordance with the laws of Australia, to observe confidentiality with regards to all information which you give to us about you (“Confidential Information”). However, we are permitted, in terms of the laws of Australia, to disclose Confidential Information under certain circumstances, including where we are required to do so in terms of law, where ordered to do so by a court order, or where we obtain your consent first (amongst others).

In accordance with the provisions of Australian law, by accepting the general terms and conditions of Islamic Money you agree that this Privacy Policy regulates your relationship with Islamic Money. You consent to us disclosing information about you that we acquired during the course of our relationship to the following entities and/or in the following circumstances:

- to any of our professional advisers (including but not limited to financial, legal, management and other advisers as might be engaged from time to time), or to any of our group entities or affiliated entities, or to any consultants (including market research entities, advertising agencies) or to any actual or potential assignee or transferee of Islamic Money’s rights against you, or to any person who may otherwise enter into contractual relations with Islamic Money in relation to the business relationship with you;

- to any person to whom we have outsourced any activities or services of Islamic Money, including any material and/or non-material activities and/or services of Islamic Money;
- to intermediaries, including your agent, adviser, broker or a representative or person acting on your behalf;
- to government, statutory or regulatory bodies and enforcement bodies where required by law;
- to debt collection agencies, your guarantors, organisations involved in valuing, surveying or registering a security property, or which otherwise have an interest in such property;
- to other Australian Financial Services Licensees, Australian Credit Licensees and other financial institutions and service providers (including, for example, operators of Pay ID services);
- to credit reporting agencies;
- to a person or entity when the information is required to be disclosed or is requested to support a due diligence exercise; and
- to a person or entity when the information is required in the normal course of business with institutions or other persons who are normally bound by similar obligations of secrecy.

Unless otherwise provided in this Privacy Policy, or other terms agreed with Islamic Money, the obligation of secrecy shall survive the termination of the relationship between us.

8. Third Party access to your information

We constantly strive to ensure that your information is always kept safe and secure. All our staff and all third parties with permitted access to your information, are specifically required to observe this Privacy Policy. We aim to keep your information up to date and in this regard, we may use third parties to process information on our behalf. We will only disclose personal data to third parties if this is required for the purpose of fulfilling any specific request that you may make to us, or otherwise if we are to provide information if required by governmental bodies, agencies or regulators, however exclusively under proper authority, or if permitted in terms of this Privacy Policy.

We will not process or provide third parties with information regarding your financial transactions / accounts held with us unless we are required or permitted to do so by law, by court order, with your consent or as otherwise set out in terms of this Privacy Policy. Whenever third parties process your information upon our request, we will bind them to keep such information in strict confidentiality. In the processing of information, your information will always be kept protected by strict codes of secrecy and security to which we, our staff and third parties are subject to and will only be used in accordance with our instructions.

9. Direct Marketing

We may use your contact details and process your personal data to inform you of relevant opportunities, developments, events and products that may be of interest to you. We may carry out direct marketing in order to inform you, by mail, telephone, email or other electronic means, about other products and services provided by Islamic Money, its subsidiaries, affiliates, associates, agents and by carefully selected third parties and for research purposes. Should you not want to be contacted for marketing purposes, you should inform us accordingly by ticking the appropriate box in the personal profile form or relevant application form, or otherwise inform us by sending a written request to this effect (by sending it to help@islamicmoney.au or by sending a letter to us).

We may need to contract third party companies to carry out bulk mailing or marketing campaigns on Islamic Money's behalf, in which case we would be required to provide them with your contact details excluding personal financial information. Such third-party companies will be required to comply with all provisions of law including data protection when using information included in Islamic Money's mailing list.

10. Your Rights

You have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you. If you require this, then please reach out to us via help@islamicmoney.au. If we refuse to give you access or provide you access only to certain information, we will provide you with reasons for the refusal and the related provisions of the Privacy Act on which we rely to refuse access.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. We may refuse to correct your personal information; if we do so refuse, we will provide reasons for the refusal in writing. If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take reasonable steps to ensure that such a statement is associated with all records containing the relevant information. If you require this, then please reach out to us via help@islamicmoney.au.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase

your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Islamic Money is under certain obligations to retain specific data for a minimum number of years. Please note that these retention requirements supersede any right to erasure requests under applicable data protection laws.

Object to processing of your personal data. This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights. As a licensed institution, Islamic Money is under certain obligations to process and retain certain data for compliance purposes. Please note that these requirements supersede any right to objection requests under applicable data protection laws. If you object to the processing of certain data, then we may not be able to provide Islamic Money services and it is possible we will have to terminate your accounts.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. In this case, we may have to cancel your use of Islamic Money services, but we will notify you if this is the case at the time.

If you make a request to us with respect to the rights outlined above we will usually respond to your request within 30 days of the receipt of the request. If we require further time we will contact you in writing to advise of this and provide our reasons for the further time that is requested.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (including providing Islamic Money services). In this case, we may have to cancel your use of Islamic Money services, but we will notify you if this is the case at the time.

11. Web Technology

Whilst we take measures to ensure that your personal data cannot be intercepted by third parties, please note that when using our website, data is transported over an open network (the internet) which is accessible to third parties, and which cannot be regarded as a secure environment. We may transmit or store any data provided by you when using our website outside your country of residence. In such cases, we will make every effort to secure an appropriate standard of protection for your data, including those relating to client confidentiality and data protection, but it is possible that data may be relayed to a country in which the prevailing standards of data protection are lower than in your country of domicile. We accept no responsibility or liability for the security of your data during transmission via the Internet. We would like to draw your attention to the fact that you can communicate with us by other means whenever you consider it appropriate on data protection grounds. Further details about our Website Terms and Use are available here: islamicmoney.au

12. Cookies

Like other websites, our website utilises a standard technology called 'cookies'. A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer's (or other device's) browser from a website's server and is stored on your computer's (or other device's) hard drive. Cookies allow a website to remember things like your preferences or whether you have logged in, and they allow us to tailor our website to your interests. Information supplied by cookies can also help us to analyse your use of our website and help us to provide you with a better user experience.

We use two types of cookies:

- Essential Cookies for the Internet Service. These are session cookies that expire at the end of the session (that is, once you log-out of the Internet Service) or when the browser is closed. If you block or refuse these cookies, then you might not be able to log in or use the Internet Service.
- Non-Essential Cookies. We use cookies provided by some external purposes to assist us in tracking usage and for other requirements.

Most browsers are initially set to accept cookies. If you prefer, you can set your browser to refuse cookies. You can find information about how to change your browser settings as well as other useful information about cookies here: www.allaboutcookies.org.

If you do not adjust your browser settings to disable the use of cookies, then you are deemed to consent to Islamic Money's use of cookies for our website.

13. CCTV and Telephone

We may monitor and record your telephone calls with us to ensure that your instructions are accurately carried out, to help us to continually improve our service and to improve security. In the interest of security, we may use CCTV recording equipment in and around our premises.

We may change the content or services found on our website at any time without notice and consequently our Privacy Policy may change at any time in the future without notice. We will publish any updated version of our Privacy Policy on our website and by continuing to use our website and/or deal with us, you accept this Privacy Policy as it applies from time to time.

14. How to contact Islamic Money

You can contact us and find out more information about us in the following ways:

- Online at islamicmoney.au
- Call us on 1300 475 264; or
- Visit us at Level 35, 100 Barangaroo Avenue, Sydney NSW 2000 (please call us to arrange an appointment first).

15. Complaints

If you have a complaint or concern about how we collect, hold, use or disclose your personal information, contact us straight away by:

- Emailing your feedback to help@islamicmoney.au;
- Calling us on 1300 475 264
- Write to us at Level 35, 100 Barangaroo Avenue, Sydney NSW 2000

You will be advised of the details (including the timeframes) of our internal dispute resolution process and an officer with the appropriate authority to resolve the dispute will investigate your complaint thoroughly.

We will do our best to resolve any complaint promptly and to your satisfaction.

If you are not satisfied with our handling of your matter, you can refer your complaint to external dispute resolution. The Australian Financial Complaints Authority (AFCA) scheme is a free service established to provide you with an independent mechanism to resolve specific complaints.

The contact details for AFCA are:

GPO Box 3
Melbourne Vic 3001
Telephone: 1800 931 678 (9am – 5pm AEST)
Fax: (03) 9613 6399
Email: info@afca.org.au or visit www.afca.org.au