

## Privacy Policy

CreditWise Pty Ltd ('CreditWise', 'we', 'us') is committed to protecting your privacy and the confidentiality of all your information, including your personal information. In handling any information we hold about you, CreditWise complies with the Privacy Act 1988, including the Australian Privacy Principles.

Also, as an incorporated legal practice, when you engage us for legal services we are bound by professional obligations of confidentiality and legal professional privilege. We handle all information we receive, including any personal information, in accordance with those obligations in addition to our Privacy Act obligations.

Our privacy policy sets out how we collect and manage your personal information and how you can access that information if you wish.

### Collection of personal information

We will collect personal information directly from you, where possible, unless you authorise an agent or intermediary, such as your employer, to provide us with the information required.

We collect your personal information for the following purposes:

- to provide you with legal, compliance or training services you, or your business, requests *and/or*
- to advise you of training or other regulatory or market developments relevant to your business *and/or*
- for general management and reporting purposes, such as invoicing and accounts management.

In some circumstances, we may collect personal information about you from a third party, such as your employer. If we collect personal information about you in this way, the only personal information we will hold about you will be your name and your email address.

We expect the person who gave us your information to inform you that it has been provided so you can be enrolled in our online training service.

Where we have access to the personal information of your clients or customers, we comply with both your Privacy policy and our own in the management of that information.

### How we use or disclose your personal information

We will use and disclose your personal information for the primary purpose for which it was collected, which is to provide you or your employer or business with legal, compliance or training services.

We may also use and disclose your personal information for related purposes such as invoicing, progress and completion reports to your employer and other administration purposes, including systems management and development.

We may disclose your personal information to:

- your employer, but only if s/he has paid for your training topics and a progress report is requested
- contractors and service providers who we engage to assist us
- regulatory authorities, if required by law *and*
- our systems providers, developers and analysts to assist in the further development of our services

We may engage third party contractors to perform services for us, which involve the contractor handling the information we hold. For example, we may engage contractors to provide specific legal, compliance, training or administrative services, develop our online training products and to provide accountancy services or systems enhancements.

Where we engage contractors to perform services for us, we prohibit the contractor from using personal information about you except for the specific purpose for which we supply it. In the majority of

situations, your personal information is not made available to contractors, other than those involved in the developing our training services.

#### **Other people's information you provide to us**

If you provide us with personal information about someone else, such as other staff members, you must ensure you are entitled to disclose that information to us and that the person concerned knows about, and agrees to, our collection, use and possible disclosure of their information for the purposes described above.

#### **Marketing**

In general, we do not directly market to our clients. We may, however, contact you by email or through our Learning Management System to provide you with updated information about new CPD topics available or regulatory and/or market developments.

If you do not wish to receive this information, you may remove your name from our mailing list by contacting us using the contact details below indicating you wish to be removed from our mailing list.

We do not disclose your personal information to third parties for the marketing of their products and services.

#### **Information Storage**

All information we hold in providing you with legal and compliance services is held in Australia and in accordance with our client agreement.

Where you use our online training service, your name and email address details in our Learning Management System are held offshore in any of the United States of America, the United Kingdom or Greece.

#### **Emails and Electronic Form**

We will record your name and email address to assist us provide you with online training. If you do not provide an email address, we may be unable to offer you the services you request.

Information provided to a third party, such as your employer, will only be done for the purposes for which your information was provided.

#### **Website**

In general, you can visit our website without telling us who you are or revealing any information about yourself. We will, however, need to collect your name and email address if you send us an enquiry, download any of our resources or enrol in our training service.

Our website does track what pages are viewed and for how long.

#### **Cookies**

A cookie is a small amount of information stored on your computer by a website server. It is information that your web browser sends back to the web site server whenever you revisit a site. Cookies gather information about your operating system.

We may use this information to analyse the traffic on our website, and better serve you when you return, but it is not our intention to use this information to personally identify a user unless you request us to provide you with something specific, like an e-book.

You have the option to configure your Internet browser to notify you when you receive a cookie or to block all cookies. Please note, however, that if you refuse or otherwise block cookies you may not be able to use all of the functionality available on our website.

#### **Links to other sites**

This Privacy Statement does not apply to websites linking from our site, [www.creditwise.com.au](http://www.creditwise.com.au). When you link to another site we recommend you read the privacy policy of that site.

We do not guarantee secure transmission of data transmitted via our website, despite our efforts to ensure all transmissions are secure in all respects.

**Your access, and corrections, to personal information we hold about you**

You can access the personal information we hold about you by using our contact details below.

That information will generally be related to training information and will be your name, email address and training module progress, if your enrolment is active. Where your enrolment has lapsed, your training records are deleted so previous history will not be available.

We will respond to your query within 2 business days, where possible. We may charge you for any reasonable costs we incur in providing you with access to the information you require.

We will always provide you with access to your personal information unless we have a legal duty of confidentiality or non-disclosure as mentioned above. If we refuse you access to the information, we will provide you with reasons for the refusal, including any exceptions relied upon under the *Privacy Act*.

Where any of the information we hold is incorrect, we will update it at your request. Where you no longer require our training services, your information will be deleted.

**Storage and security of your personal information**

Your information will be stored as electronic data in CreditWise's systems, including our Learning Management System where relevant. We protect it from misuse, loss, unauthorised access, modification and disclosure by using a range of physical and electronic security measures.

We, and our service providers, maintain computer and network security; for example, by using firewalls and other security systems such as user identifiers and passwords to protect information and to control, and monitor, access to the systems involved.

**Complaints, queries and update requests**

If you have any complaints, queries or update requests involving how we manage your personal information, please use our contact details below.

**Our contact details**

Please contact Kate Keating on 0405 604 359 or [Kate.Keating@creditwise.com.au](mailto:Kate.Keating@creditwise.com.au)

**Privacy Statement updates**

We may update this Privacy Statement from time to time, whenever the law changes or we change our policies and procedures. Our current Privacy Statement will be available on our website or you can request a copy should you wish, using our contact details (above).

Effective as of January 2022