

# Privacy Policy

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## Direct Memory Access Pty Ltd

T/A DMA Unit Trust  
ACN 065 932 238,  
ABN 69 500 836 953

### PRIVACY STATEMENT

#### 1. Background

The below information outlines the privacy policy of Direct Memory Access Pty Ltd (ABN 69 500 836 953) and all of its related companies (DMA) with relation to its operations but not limited to within Australia.

DMA is fully committed to protecting the privacy all personal information it received and collects from their customers. This Privacy Policy outlines how DMA collects, discloses, handles and uses personal information provided by its customers. This document also explains how you are able to access and amend any information we hold about you or your company or lodge a complaint about any suspected breach of privacy.

#### 2. Your rights in relation to privacy

**Direct Memory Access Pty Ltd (DMA)** conveys the importance of protecting individual's privacy and personal information and is fully committed to protecting your privacy.

In holding your personal information, DMA will fully comply with the Privacy Act 1988 (Cth) (**Privacy Act**) and with the 13 Australian Privacy Principles in the Privacy Act. This commitment to compliance will extend but not be limited to how DMA handles your credit related personal information, DMA will also comply with the current Credit Reporting Code that is registered with the Australian Information Commissioner.

#### 1. What personal information do we hold & collect?

The Personal information we seek is information of an identified, or reasonably identifiable, individual. During the provision of our services to you, DMA may be required to collect personal information pertaining to you.

In general, the personal information DMA collects are:

- ID and contact and identification information such as your name and previous names, post address and previous addresses, telephone number, email address, facsimile number, gender, date of birth.
- employment information such as your current and previous places of employment;
- banking details and/or credit card details where necessary to facilitate direct debit payments;
- financial details including but not limited to your tax file number
- information about your computer hardware and software, including IP addresses, domain names, access times and accessed website addresses to the extent this information constitutes personal information;

- credit information, where relevant to our assessment of an application to become an authorised reseller, including where you have applied to guarantee any payments under such a dealer account, being credit-related personal information lawfully created and accessible within the Australian credit reporting system including:
  - identification information;
  - consumer credit liability information which includes information about credit providers and credit accounts, including the dates on which the accounts are opened and closed, their terms and conditions (or changes to the terms and conditions) and the maximum limit of credit available under an account;
  - information about your repayment history, including whether you have made payments when due, and if not, when overdue payments have been made;
  - whether you have defaulted on a payment (ie. a payment that is at least 60 days overdue and over \$150 in value);
  - whether you have paid any amount previously reported as being in default;
  - information about any debt collection activities which is carried on by any mercantile agents.
  - information about other credit providers having sought credit-related information about you from a credit reporting body;
  - information about the types of consumer or commercial credit, and the amounts of credit, you have sought in an application;
  - any other information lawfully obtainable within the Australian credit reporting system;
  - information regarding your land title holdings and valuations of such land;
  - information about court proceedings that relate to credit provided to you or for which you have applied;
  - personal insolvency information about you;
  - publicly available information relating to your credit worthiness;
  - information about a credit provider's opinion that you have committed a serious credit infringement in relation to consumer credit provided by that credit provider to you;
  - any other information as notified to you from time to time
- credit eligibility information which is credit related information about you that DMA obtains from the following credit reporting bodies (collectively, **the CRBs**):
  - National Credit Insurance (Brokers) Pty Ltd (**NCI**), (the details of which are set out in paragraph 5);
- any other additional information DMA received from credit eligibility information derived from our own analysis including through an internal evaluation process to assess your worthiness for credit. We generally receives from the CRBs credit related personal information including, but not limited to, information relating to credit worthiness, credit standing, credit history or credit capacity and the information set out above; and

## 2. How does DMA collect personal information?

In general, DMA collects all personal information directly from you, through the completion of a manual or online form accessible to you in both means, including but not limited to a dealer application form, credit application form,

RMA request form and other means of exchange or interaction in person or by way of telephone, fax, email, post or through the use of the website. There are also occasions when DMA will collect your personal information, including credit related personal information, from other sources such as from:

- your employer, where necessary for DMA to provide its products and/or services to your employer through you;
- the CRBs (or any other credit reporting body);
- the completion of an application form by another person or entity that lists you as a director, guarantor or trade reference, or an accountant or banker of that person or entity;
- another credit provider or banker;
- an information services provider;
- a publicly maintained record or other publicly available sources of information including social media and similar websites;
- DMA vendor partners reports or events

Generally speaking, we will only ever collect personal information of you from other sources other than yourself if it is unreasonable or impracticable to do so.

### 3. **Why does DMA need your personal information?**

The main purposes for which we collect, hold, use and disclose personal information are:

- a) To provide products and services to our customers;
- b) To obtain products and services from our suppliers;
- c) To respond to enquiries from existing or prospective customers seeking information about our products or services; and
- d) To process and assess employment app
- e) providing general statistics regarding use of the DMA website in order to deliver customised content and advertising to customers whose behaviour indicates an interest in a particular subject area, where they have consented to receive such advertising;
- f) processing an application made by you or your employer, for example, for credit, including a reseller account and if successful, administering that account;
- g) to notify credit providers of your credit history, including relating to defaults;
- h) to access information related to your credit worthiness and to evaluate and monitor your credit worthiness, including through internal credit scoring;
- i) conducting market research and/or customer satisfaction research;
- j) facilitating and processing payments relating to you;
- k) facilitating appropriate insurance cover and assessing, processing and investigating insurance risks and/or claims relating to you;

- l) accounting, billing, record keeping, systems development testing, staff training and/or other internal administrative purposes;
- m) developing, establishing and administering business partnerships and other arrangements with other entities in relation to the promotion, administration and use of DMA's products and services;
- n) identification, prevention and investigation of, and/or co-operation with relevant law enforcement bodies in relation to, any criminal or fraudulent activity relating to you;
- o) debt collection; and
- p) identifying and informing you of events and training that may be of interest to you from DMA or selected third parties;
- q) assessing your application for employment with DMA or otherwise for the purposes of engaging you as a contractor or consultant;
- r) any other legal or regulatory requirements.

We encourage you to review the privacy statements other companies so you also understand how those companies collect, use, disclose and otherwise handle your information.

**s) To whom does DMA disclose your personal information?**

DMA discloses your personal information for the purposes for which DMA collects it. That is, generally speaking, DMA will only disclose your personal information for a purpose, or purposes, set out at section 3. This may include disclosing your personal information to:

- i) third parties engaged to perform administrative or other services, including delivery companies and mailing houses;
- ii) entities who perform statistical analysis on behalf of DMA
- iii) vendors or entities who perform sales out report and sales analysis;
- iv) people or entities considering acquiring an interest in DMA enterprise or assets;
- v) DMA's professional advisors, contractors, consultants and related bodies corporate;
- vi) insurance providers, insurance brokers and insurance underwriters;
- vii) mercantile agents;
- viii) debt collection providers;
- ix) guarantors or prospective guarantors;
- x) credit providers;
- xi) the CRBs; and
- xii) regulatory bodies.

In particular, DMA may disclose to the CRBs and other credit reporting bodies information about you failing to meet your payment obligations or if you commit a serious credit infringement. Such credit reporting bodies may include any information provided by DMA in reports provided to other credit providers for the purpose of such credit providers assessing your credit worthiness. Such disclosures are always on a confidential basis or otherwise in

accordance with law. DMA may also disclose your personal information with your consent or if disclosure is required or authorised by law.

- NCI can be contacted:
  - in writing to: PO Box 33245, MELBOURNE VIC 3004; or
  - via telephone on 1800 337 036.

NCI's policy on its management of credit related personal information can be accessed through its website at:

<https://www.nci.com.au/privacy.asp>

#### **4. Direct marketing**

DMA may use and disclose your personal information in order to inform you of products, services, promotions and events that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting DMA via the contact details available to you or through any opt-out mechanism contained in a marketing communication to you.

#### **5. Security of your personal information**

DMA takes steps reasonable in the circumstances to ensure that the personal information, including credit related personal information, it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. DMA holds personal information in both hard copy and electronic forms in secure databases on secure premises (including through locks, firewalls, encryptions, such as the Secure Socket Layer protocol, log-ins and passwords, and other physical and network security measures as appropriate), accessible only by authorised staff. Credit eligibility information, such as information DMA receives from the CRBs for the purpose of assessing credit applications, is stored through equally secure methods. Staff are bound by security policies and confidentiality agreements, which are regularly revised and re-issued.

DMA will destroy or de-identify personal information (whether through shredding hardcopy documents or permanently deleting from its systems or de-identifying electronically-held information) in circumstances where it is no longer required, unless DMA is otherwise required or authorised by law to retain the information.

If you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud, you may request the CRBs not to use or disclose credit related personal information they hold about you by contacting the CRBs on the details set out in paragraph 5.

#### **6. Use of cookies**

The DMA website uses session 'cookies' which are text files placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

Cookies used by DMA do not contain any of your personal information but enable us to recognise the number of times you access the DMA website through your computer so that DMA can tailor the information made available to you with the view to making your visit to the website easier, faster and more productive.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the DMA services or web sites you visit.

## **7. Can you access and correct the personal information that DMA holds about you?**

To obtain access to your personal information:

- you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- DMA requests that you be reasonably specific about the information you require; and
- DMA may charge you a reasonable administration fee, which reflects the cost to DMA, for providing access in accordance with your request.

We will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

If you are dissatisfied with DMA's refusal to grant access to, or correct, your credit related personal information, you may make a complaint to the Office of the Australian Information Commissioner.

## **8. How to contact us**

If you would like to contact us with further enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional communications, please contact us at:

**Tel: 08 9204 7000 Fax: 08 9445 9504**

[webmaster@dma.net.au](mailto:webmaster@dma.net.au)

## **9. Privacy complaints**

Please direct all privacy complaints to DMA. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and

- will not affect your existing obligations or affect the commercial arrangements between you and DMA.

Specifically, if your complaint relates to credit related personal information and/or DMA's failure to comply with its obligations regarding credit related personal information under the Privacy Act and/or the Credit Reporting Code:

- we will acknowledge your complaint within 7 days of receipt and endeavour to resolve it within 30 days, unless we inform you otherwise and seeks your agreement in writing;
- we may consult with relevant third parties, such as the CRBs or other credit providers, in order to sufficiently and expeditiously resolve the complaint; and
- if your complaint relates to our refusal to provide access to, or correct, your credit related personal information, you may complain directly to the Office of the Australian Information Commissioner.

We will commence an investigation into any complaint made by you to DMA. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint or seek an extension to the time in which DMA will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner.

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