

# Privacy Policy

## Definitions

For the purposes of this Privacy Policy:

**Act** means the *Privacy Act 1988* (Cth).

**Paddington St Finance** (referred to as either "Paddington St Finance", "We", "Us", or "Our" in this Policy) means Paddington St Finance Pty Ltd (ACN 614 210 669) and its related bodies corporate.

**Cookies** means small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

**Notifiable Data Breach** means a data breach whereby Personal Information in Paddington St Finance's control is accessed without authorisation, disclosed without authorisation, or is lost, where such data breach is likely to cause You serious harm.

**Device** means any device that can access the Website such as a computer, a cell phone or a digital tablet.

**OAIC** means the Office of the Australian Information Commissioner.

**Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable from the information, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

**Policy** means this privacy policy.

**Usage Data** refers to data collected automatically, either generated by the use of the Website or from the Website infrastructure itself (for example, the duration of a page visit).

**Website** means Paddington St Finance's website, accessible from "<https://www.paddingtonfinance.com.au>".

**You** (referred to as either You or Your) means the individual, company or other legal entity accessing or using the Website.

## Overview

This Policy is made in accordance with Paddington St Finance's obligations under the Act and the *The Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth). The Policy sets out Paddington St Finance's policies and procedures in relation to the collection, use and disclosure of Your Personal Information by Paddington St Finance.

As a financial service provider, Paddington St Finance is subject to legislative and regulatory requirements to obtain and hold certain information which personally identifies and/or contains information or an opinion about an individual. Paddington St Finance may also collect or use Personal Information for alternative purposes, as set out in this Policy.

We will collect, use and disclose Your Personal Information in accordance with the Act and this Policy.

Paddington St Finance may, from time to time, review and update this Policy to take account of new laws, regulations and technology and changes to Paddington St Finance's operations, practices and corporate structure.

## **Collecting, Using and Holding Your Personal Information**

### **Types of Personal Information Collected**

#### Personal Data

The type of information Paddington St Finance may collect and store includes (but is not limited to) Personal Information, including Your:

Name  
Email address  
Residential Address  
Phone number  
Usage Data

Personal Information may be collected by Paddington St Finance either through the contact form on the Website, over the phone, during face to face meetings, from emails or if the Personal Information is provided to Paddington St Finance by a third party (including at Paddington St Finance's request), for example a company report issued by the Australian Securities and Investment Commission or the New Zealand Companies Office.

#### Usage Data

Usage Data is collected automatically when using the Website.

Usage Data may include information such as Your Device's IP address, browser type, browser version, the pages of Our Website that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Website by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit Our Website or when You access the Website by or through a mobile device.

#### Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Website and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse the Website.

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of Our Website.

### **For what purpose do We collect, use and hold Personal Information?**

Paddington St Finance's primary purpose for collecting, using and holding Personal Information is to enable Paddington St Finance to consider entering into arrangements to provide loans to companies, and to then provide those loans. This may include (but is not limited to):

- Reviewing project documents and company extracts to determine whether Paddington St Finance will agree to lend funds to a project.
- Contacting You, Your agent or other representative.
- Attending to and managing Your requests to Us.
- Satisfying Paddington St Finance's contractual obligations to its funders and clients.

- Complying with Paddington St Finance's legal and regulatory obligations, for example under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).
- Attending to the day-to-day administration of Paddington St Finance.
- Operating the Website, including monitoring usage of the Website.

Where Paddington St Finance requests Personal Information about a client or prospective client, if the requested information is not provided, Paddington St Finance may not be able to continue dealing with the client or prospective client.

### **How and for how long do We hold Your Personal Information**

Paddington St Finance holds the Personal Information it collects electronically on its cloud-based company servers. Some of these servers may be located outside Australia. Paddington St Finance will also store some Personal Information on local servers and in paper files.

Paddington St Finance will hold Your Personal Information only for as long as is necessary for the purposes set out in this Policy.

Usage Data is generally retained for a shorter period of time than other Personal Information, except when this data is used to strengthen the security or to improve the functionality of Our Website, or We are legally obligated to retain this data for longer time periods.

Paddington St Finance will take all steps reasonably necessary to ensure that Your Personal Information is held securely and in accordance with this Privacy Policy. The security of Your Personal Data is important to Us, however no method of transmission over the Internet, or method of electronic storage, is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Information, We cannot guarantee its absolute security.

### **Disclosure of Your Personal Information**

We may share Your Personal Information between the companies in the Paddington St Finance company group, including its related parties.

We may also share Your Personal Information to:

- Paddington St Finance's third-party service providers, such as Our legal or tax advisers. These disclosures are subject to confidentiality.
- Co-financiers or other entities that are engaged on projects in relation to which You have engaged Paddington St Finance's services. Such disclosures will be made for the purpose of conducting Our business and will ordinarily only be made to the relevant entity's legal representative.

Under certain circumstances, Paddington St Finance may be required to disclose Your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Paddington St Finance may also disclose Your Personal Information in the good faith belief that such action is necessary to:

- Prevent or investigate possible wrongdoing or a data breach in connection with the Website.
- Protect the personal safety of Users of the Website or the public.

### **Do We disclose Your Personal Information to Overseas recipients?**

We may disclose Your Personal Information to recipients located outside Australia. This may include:

- Our third parties service providers operating overseas.

- Co-financiers or other entities operating overseas that are engaged in relation to which You have engaged Paddington St Finance's services. Such disclosures will be made for the purpose of conducting Our business and will ordinarily only be made to the relevant entity's legal representative. The location of the entity will depend on the requirements of the transactions in respect of which you have engaged Paddington St Finance's services.

### **Links to Other Websites**

Our Website may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party websites.

### **Changes to this Privacy Policy**

We may update Our Privacy Policy from time to time by posting the new Privacy Policy on our Website.

### **Notifiable Data Breaches**

We will notify You and the OAIC as soon as practicable of any Notifiable Data Breach in relation to Your Personal Information.

If You believe there has been a Notifiable Data Breach in respect of Personal Information in Our control but that We have not notified either You or the OAIC, please contact Us immediately by phoning: +61 2 9357 0777.

### **Complaints regarding privacy**

If You have any complaints or concerns regarding Our collection, use or disclosure of Your Personal Information, You can contact Our Compliance Officer by phoning: +61 2 9357 0777.

If You are not satisfied with Our response to Your complaint, You may make a complaint to the OAIC ([www.oaic.gov.au](http://www.oaic.gov.au)).

### **Contact Us**

If you have any questions about this Privacy Policy, including if You would like to access any Personal Information We hold about You for the purpose of correcting such Personal Information, You can contact Us by phoning: +61 2 9357 0777