

# PRIVACY POLICY

Last Updated: 11 July 2024

## YOUR PRIVACY

At Harris Scarfe we manage your personal information in an open and transparent way. Harris Scarfe will only use your personal information when it is necessary for us to deliver you a service or perform other necessary business functions and activities.

Harris Scarfe will not use or disclose your personal information for purposes unrelated to the services we provide, unless we first obtain your consent.

## ABOUT THE PRIVACY POLICY

The *Privacy Act 1988* (Cth) (**Privacy Act**) applies to the collection and use of your personal information. DC Opco Pty Ltd trading as Harris Scarfe, ABN 83 095 018 803 (**Harris Scarfe, HS, our, us, we**) are committed to the protection of the personal information of all of our customers. We have developed this policy in line with the 'Australian Privacy Principles' (**APPs**) and the Privacy Act to provide you with information on how we deal with your personal information including how we collect, hold, use and disclose your personal information and how you may access and correct it.

This policy applies in addition to the Credit Reporting Privacy Policy if you apply for, or hold, a Harris Scarfe Credit Card.

Please take some time to read through this policy before you provide us with any personal information. We also encourage you to check this policy regularly as it may change from time to time. If you have any suggestions or concerns that are not addressed in this policy, please contact us.

### What kind of personal information do we collect?

We will only collect personal information about you if it is reasonably necessary for our functions and activities. We may collect information from you that personally identifies you such as your name, email address, home address, telephone number,

gender, date of birth, age, details of communications with us (written or verbal), personal interests, the number of children you have and their ages and gender and, in some instances, government identifiers (such as your driver's licence).

## Sensitive information

We generally will not collect sensitive information about you (such as racial or ethnic origin, political opinions, religious or philosophical beliefs or details of health or disabilities). However, in some cases we may ask you to provide information related to your health or disabilities to assist us in providing you with specific services. We will only collect and use sensitive information in compliance with the APPs.

## Non-personal information

We may collect information that does not personally identify you but will instead track your use of our websites so that we can better understand how our websites are used by customers and in turn enhance and improve your experience as a customer. We may obtain this information by the use of 'Cookies' which comprise a small data file transferred to your device that recognises and identifies your device and allows your device to 'remember' information from our websites for future use. Your device should allow you to refuse Cookies if you wish by changing the settings. However, if you do, some services may not be available to you, including the ability to place orders on our websites. We also use Google advertising programs that use Cookies to improve your online experience, including the display of more relevant ads on external websites. You may opt out of these programs by clicking <https://www.google.com/settings/u/0/ads>.

## Pseudonyms

You have the option of not identifying yourself or dealing with us using a pseudonym in relation to particular matters. However you will appreciate that, in some circumstances, it may not be possible for us to deal with you if you do not identify yourself.

## How do we collect personal information?

We collect personal information directly from you in the normal course of business, including electronically when you visit our websites. You may be asked to provide us with personal information when you:

- make online shopping purchases, including via third party payment platforms such as *Afterpay*;
- make in-store shopping purchases including lay-bys;
- return goods without a receipt;
- subscribe to our newsletters or join our mailing lists;
- complete one of our forms, including online through our social media channels, wholesale account application forms, or forms provided with our goods;
- enter into competitions or trade promotions;
- sign up to *hsfriends*;
- request goods to be delivered to you or services to be provided to you;
- register a gift card;
- register as a customer, or otherwise use, our websites; and/or
- make an enquiry with us or correspond with us.

We may collect personal information about you from third parties where you have consented to such collection, or would reasonably expect us to collect your personal information in this way. This would include where you apply for a Harris Scarfe Credit Card account with us.

You consent to us collecting, holding, using and disclosing such information in accordance with this policy.

If we receive information about you from a third party and it is not information we need in respect of our business activities, we will destroy or de-identify that information (provided it is lawful to do so).

If we collect personal information about you from other entities and you have not already given your consent to that collection, we will take such steps as are reasonable in the circumstances, to notify you that we have collected personal information, how it was collected, and why we have collected it and provide you with a copy of this policy.

## Recruitment

We collect personal information (which may include sensitive information) if you register or apply for a job with us. As part of that process, you agree that we may collect personal information about you from you and your referees, recruitment agencies and related service providers. This personal information is collected for recruitment purposes and will be used solely for that purpose. You consent to us disclosing such personal information to third party service providers who provide recruitment related services to us.

### How do we hold personal information?

We will use all reasonable endeavours to maintain the security of your personal information and to protect your personal information from misuse, interference and loss and against unauthorised access, modification or disclosure. Any personal information that we receive is securely stored and access is restricted to our authorised personnel. Although we ask for credit card information in order to process some requests from you, we do not store complete credit card information on our web server. We use secure payment platforms to process online orders all in a 'secure socket layer' environment and our websites all use GlobalSign EVSSL Certificate.

### How do we use personal information?

If we hold personal information about you that was collected for a particular purpose, we will not use or disclose it for another purpose unless: (a) you consent; (b) you would reasonably expect us to use or disclose it for that other purpose; or (c) it is required or authorised by law or a court/tribunal order.

We generally use personal information, and you consent to us using your personal information, to:

- deliver or help you manage our products or services;
- complete transactions with you or on your behalf, including lay-by purchases;
- enable us to undertake a credit assessment;
- conduct promotions or competitions;
- help us manage and improve our services and websites;
- communicate with you;

- where you have consented to receive direct messaging, send you ongoing information, offers and promotional material about opportunities, products and services which we believe may be of interest to you;
- manage and resolve legal, consumer or commercial complaints and issues;
- conduct market research and analysis;
- manage and recruit employees;
- carry out internal functions including training and internal audits.

When returning or exchanging goods, we require you to provide proof of purchase from us. If a return is approved without proof of purchase, we will require suitable personal information from you for the purposes of identification. This personal information may be recorded with the transaction as part of our fraud prevention program. Information collected in these circumstances will only be used for this purpose.

## SMS alerts

We may promote our goods and services to you via SMS alerts but only if you have consented to receive such information via SMS. To stop receiving all Harris Scarfe SMS alerts follow the instructions in the SMS alert. You will receive a confirmation message and then no further SMS alerts will be sent to your number.

## Who do we disclose personal information to?

We do not disclose your personal information to anyone else unless:

- you have consented to the disclosure;
- you would reasonably expect, or have been told, that your information is passed to those individuals, businesses or agencies;
- we sell all or part of our business, merge with another company or business, or restructure our business (or contemplate doing any of the foregoing), in which case we may transfer or disclose your personal information to the parties involved in the transaction for the purposes of that transaction;
- if it is reasonably necessary, in our opinion, to protect our rights or property or that of any third party or to avoid injury to any person; or
- it is otherwise required or authorised by law

You consent to us disclosing your personal information to our authorised personnel and to:

- our parent company and its other related companies;
- to companies that perform services on our behalf, such as delivery services, mail outs, customer liaison services, data entry services, trade promotion or gift card administration, account management services and debt collection services;
- our professional advisors, including auditors and lawyers;
- payment system operators and financial institutions; and
- organisations authorised by us to conduct promotional, research and/or marketing activities.

We take reasonable steps to ensure that third parties that we disclose your personal information protect your privacy to the same standard expected of us.

## Direct marketing

If you have provided us with your personal information for the express or implied purposes of receiving direct marketing, you hereby consent to us, and our business partners using your personal information to advertise or send you information about their products and services which we think may be of interest to you.

You will be given the opportunity to "opt out" or unsubscribe from receiving direct marketing communications from us. Alternatively, you may contact us at the address below to "opt out" of, or unsubscribe from, any future communications. HS will use all reasonable endeavours to comply with that request within a reasonable period, and in any event, within five business days.

## Overseas

You acknowledge that we may disclose your personal information overseas in situations where:

- entities to whom we are permitted to disclose your personal information under this policy are based overseas; or
- the personal information we collect is stored on servers located overseas.

At present, we work with third party service providers based in countries including those in the European Economic Area (EEA), the Philippines, the United Kingdom and the United States. If changes in our business result in your personal information being held in other overseas countries, we will update this Privacy Policy.

You acknowledge that as a result of your consent to such disclosure (if any), clause 8.1 of the APPs does not apply.

How do you access and correct your personal information?

## Access

Where we hold personal information about you, we will provide you with access to the information on request within a reasonable time if it is reasonable and practicable to do so. Where you make a request for access to your credit reporting information, we are obliged to first obtain sufficient information to allow us to protect the security of the information, and to verify your identity and entitlement to such information. You will therefore need to provide sufficient identifying information to obtain access.

There are some exceptions where we may refuse to give you access and these are set out in clause 12.3 of the APPs. In that case, where required, we will give you written notice setting out the reasons for our refusal and the mechanisms available if you wish to complain about our refusal.

We may impose a reasonable charge for giving you access to your personal information.

You may also access and update some of the personal information you have provided to us on your 'profile' page after you login to your account.

## Correction

If we are satisfied that your personal information is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct your personal information. In addition, if you request us to correct your personal information, we will take reasonable steps to do so within a reasonable time. If you request it, we will also take reasonable steps to notify any other entity of the changes if we have previously provided your personal information to that entity. There is no fee for correcting your personal information.

## How do you contact us or make a complaint?

If you have any questions or comments on this policy, are concerned about how your personal information is being handled or if you would like to make a complaint in respect of our obligations under the APPs, please contact our Privacy Officer by:

- [Contacting us online](#)
- emailing us at: [privacy@harrisscarfe.com.au](mailto:privacy@harrisscarfe.com.au)
- writing to us at: Attention Privacy Officer, Harris Scarfe, Level 6, 111 Cecil Street South Melbourne 3205 VIC.

We will acknowledge receipt of your complaint as soon as we can and in any event within 7 days and will let you know if we need any further information from you.

We aim to resolve complaints as quickly as possible. If we do not believe we will be able to resolve your complaint in a timely manner, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, you may complain to the Office of the Australian Information Commissioner about the handling of your personal information. The Commissioner can be contacted at:

GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)

## CREDIT REPORTING PRIVACY POLICY

### About the Credit Reporting Privacy Policy

The Privacy Act 1988 (Cth) (**Privacy Act**) and the Privacy (Credit Reporting) Code 2014 (**CR Code**) apply to our handling of your credit-related personal information. Harris Scarfe Financial Services Pty Ltd, ABN 64 130 587 496, (**HS, our, us, we**) have developed this policy (**CRP Policy**) in line with the CR Code and Privacy Act to provide you with information on how we collect, hold, use and disclose your credit-related personal information and how you may access and correct it.



This CRP Policy applies in Australia and primarily in connection with our consumer credit products such as the Harris Scarfe Value Plus and Harris Scarfe Value Plus Gold credit cards (**HS Cards**).

To the extent that the CR Code and Part IIIA of the Privacy Act do not apply to your credit information, the collection, use and disclosure of that information will be governed by our general privacy policy (**Privacy Policy**).

## What kind of credit information do we collect?

We will collect credit-related personal information about you (**Credit Information**) when you apply for and/or obtain our HS Cards. This may include:

- information that identifies you such as your name, email address, home address, date of birth and drivers licence number;
- information about your financial position such as: your employment, income, expenses and savings;
- details of current and past agreements with us and other credit providers, the terms of those agreements including credit limits, the dates of those agreements, the kinds of credit products you have had or sought and how you managed your obligations in relation to them;
- the fact that credit has been applied for and the amount and type of credit;
- whether payments are owed to us or to another credit provider in connection with credit provided to you or in relation to which you are a guarantor which are overdue for more than 60 days (and, if subsequently repaid, that you have done so);
- whether in our or another credit provider's opinion you have committed a serious credit infringement;
- whether you have entered into arrangements with us or other credit providers in connection with credit provided to you;
- court proceedings information, personal insolvency information and credit-related publicly available information;
- scores, ratings, summaries, evaluations and other information relating to your credit worthiness which is derived by us or our agents or by credit reporting bodies (**CRBs**) as that term is defined in the Privacy Act, wholly or partly based on the above information; and
- certain administrative information relating to credit, such as account and customer numbers

## How do we collect credit information?

We collect Credit Information in a variety of ways, including directly from you, from persons acting on your behalf, from publicly available sources and where permitted by the Privacy Act and the CR Code, from third parties such as CRBs and other credit providers. Some Credit Information such as credit scores and credit risk ratings will also be derived by us from information we have collected.

Generally, Credit Information that we collect directly from you will also be subject to our Privacy Policy in addition to this CRP Policy.

## Why do we collect credit information?

The main reasons for which we collect, use, hold and disclose your Credit Information are to:

- assess and process an application by you for credit;
- manage your credit arrangements with us, including reviewing your credit arrangement or in connection with changes to it, such as your credit limit;
- assess certain claims including for hardship;
- collect overdue payments and to deal with serious credit infringements;
- create assessments and ratings of your credit worthiness;
- administer and manage our products and services;
- communicate with you; work with our service providers, credit managers and related companies; and
- deal with any complaints, enquiries or legal requirements.

We may also use your Credit Information to inform you of products and services that we believe may be of interest to you. However, you will have the right to 'opt out' of this as set out in our Privacy Policy. Any additional purpose for which we collect your Credit Information will be disclosed to you at the time you provide that Credit Information to us.

## How do we hold credit information?

We will use all reasonable endeavours to maintain the security of your personal information and to protect your personal information from misuse, interference and loss and against unauthorised access, modification or disclosure. Any personal

information that we receive is securely stored and access is restricted to the GBGM Group and our authorised personnel. Although we ask for credit card information in order to process some requests from you, we do not store complete credit card information on our web server.

## Who do we disclose your credit information to?

You consent to us providing your Credit Information to:

- our parent company and its other related companies;
- third parties engaged by us to perform functions or provide products and services on our behalf such as processing credit card information, providing mail outs, data storage, debt collection, marketing, research and advertising services;
- our employees and contractors who are authorised by us to use your Credit Information in accordance with this CRP Policy and our internal policies;
- organisations that provide us with insurance; and
- our professional advisors, including financial advisers, legal advisers, accountants and auditors.

We may also disclose your Credit Information to others where we are required or authorised to do so by law including under the Privacy Act. If we sell all or part of our business, merge with another company or business or restructure our business (or contemplate doing this), we may transfer or disclose your Credit Information to the parties involved in the transaction.

You acknowledge and agree that we may disclose your Credit Information overseas to our third party service providers, including to service providers based in the Philippines.

## CREDIT REPORTING BODIES (CRBS)

Which CRBs do we deal with?

You acknowledge that we may disclose Credit Information to, and acquire Credit Information from, various CRBs. The CRB that we currently deal with is Equifax Australia Information Services and Solutions Pty Ltd, which may be contacted at:

Website: [www.equifax.com.au](http://www.equifax.com.au)

Address: Equifax – Public Access, Equifax Australia Information Services and Solutions Pty Ltd, GPO Box 964, North Sydney NSW 2059

Telephone: [13 83 32](tel:138332)

Email: [subscriberassist.au@equifax.com](mailto:subscriberassist.au@equifax.com)

## When Credit Information may be acquired from CRBs?

The Privacy Act and the CR Code limit what we can do with the information we obtain from a CRB. Generally, Credit Information that we collect from CRBs can only be:

- used in relation to the consumer credit products you have applied for or hold through us;
- used for our internal management;
- used or disclosed in connection with any serious credit infringement that we believe you may committed;
- disclosed to our parent company and its other related companies our agents or our professional advisors in certain circumstances;
- disclosed to another entity for the processing and managing of any consumer credit products; or
- disclosed to other credit providers in Australia with your express written consent.

## What are your rights with respect to CRBs?

You have the right to contact CRBs directly to request that:

- they do not use your credit reporting information for 'pre-screening' you by credit providers to send direct marketing materials to you; and
- they do not disclose credit reporting information without your permission if you believe on reasonable grounds that you have been, or may be, the victim of a fraud.

## What are the CRBs credit policies?

Each CRB has its own policy as to how they manage your Credit Information. If you would like to read their policies, please visit their websites or contact them directly. If

you have any concerns regarding their response please contact the Financial Ombudsman Service Limited on Phone: 1300 78 08 08.

## How do you access and correct your Credit Information?

We will give you access to the Credit Information we hold about you and correct your Credit Information on request.

Where you make a request for access to your credit reporting information, we are obliged to first obtain sufficient information to allow us to protect the security of the information, and to verify your identity and entitlement to such information. You will therefore need to provide sufficient identifying information to obtain access.

There is no fee for requesting that your Credit Information be corrected or for us to make corrections. We may impose a reasonable fee for giving you access to your Credit Information.

Where we are required to do so by the Privacy Act and the CR Code, we will endeavour to provide you with access to, or correct, your Credit Information, within 30 days of your request (or provide you with the details of the entity which can provide you with access to, or correct, your Credit Information). Where we correct your Credit Information, we will notify other entities, which we have previously provided that Credit Information to, of the correction as required by the Privacy Act and the CR Code.

## How do you contact us or make a complaint?

If you have any questions or comments on this CRP Policy, are concerned about how your Credit Information is being handled or if you would like to make a complaint in respect of our obligations under the Privacy Act or the CR Code (or those obligations of an entity to whom we have disclosed your Credit Information), please contact our Privacy Officer by:

- Contacting us online
- emailing us at: privacy@harrisscarfe.com.au
- writing to us at: Attention Privacy Officer, Harris Scarfe, Level 6, 111 Cecil Street South Melbourne 3205 VIC.

We will acknowledge your complaint as soon as we can, and in any event within 7 days, and will let you know if we need any further information from you.

We aim to resolve complaints as quickly as possible. If we do not believe we can resolve the complaint within 30 days, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, you can approach our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Our external dispute resolution scheme is the Australian Financial Complaints Authority, which can be contacted at:

GPO Box 3  
Melbourne VIC 3001  
*Phone:* 1800 931 678  
*Email:* [info@afca.org.au](mailto:info@afca.org.au)  
[www.afca.org.au](http://www.afca.org.au)

The Office of the Australian Information Commissioner can be contacted at:

GPO Box 5218  
Sydney NSW 2001  
*Phone:* 1300 363 992  
*Email:* [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)