



Privacy Policy

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Strictly Private and Confidential

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1. Our Privacy Policy

1.1 What information is covered in this policy?

This policy tells you how Judo will

- collect
- use
- disclose, and
- manage

your personal information.

NOTES ABOUT THIS POLICY:

When you see the words “our”, “us” or “we” or “businesses” we are referring to Judo Capital Limited (ACN 612 862 727).

1.2 Why does Judo have a Privacy Policy?

- 1) Judo has a Privacy Policy to help you clearly understand how your personal information is managed. It is important to us that you are confident we respect the privacy of your personal information and feel reassured that we will manage it sensitively.
- 2) The way we manage your personal information is governed by The Privacy Act 1988 (Cth) (Privacy Act), Australian Privacy Principles and registered privacy codes.

2. Personal and Sensitive Information

2.1 What is personal information?

Personal information means any information that can be reasonably ascertained about your identity.

As a current or prospective customer or client, we need your personal information so that we can provide you with any of our services and products.

2.2 Why do we need your personal information?

We collect, hold, use and disclose your personal information for the purpose of carrying out our business functions or activities. These functions and activities include:

- 1) providing various products and services relating to our businesses to you or someone else you know, including without limitation:
 - i. lending products.
 - ii. equipment finance.

Individually and collectively referred to as “products” or “services”.

- 2) providing you with information about other services that we offer that may be of interest to you;
- 3) checking whether you are eligible for the products and services;
- 4) assisting us in managing our products and services;
- 5) facilitating our internal business operations, including the fulfilment of any legal requirements
- 6) analysing our services and customer needs with a view to improving those services, and
- 7) contacting you to provide a testimonial or a client satisfaction survey for us.

2.3 What type of personal information do we collect?

We collect personal information that is reasonably necessary for, or directly related to, one or more of the services or products we provide, or functions we carry out.

The types of personal information we may collect from you include (but is not limited to):

- 1) Name;
- 2) Date of birth;
- 3) Residential address;
- 4) Postal address;
- 5) Email address;
- 6) Telephone numbers; and
- 7) Your occupation and place of work.

Personal information may also include Credit Information (as defined in the Privacy Act 1988).

2.4 Can you deal with Judo without providing personal information?

Where it is lawful and practical to do so, you may wish to deal with us without providing any personal information, such as by providing a pseudonym or dealing with us anonymously, when you make general enquiries.

However, in order to provide some of our services to you (in particular our finance and rental services), we may need to identify you.

2.5 What is sensitive information?

Sensitive information is personal information that includes information relating to your racial or ethnic origin, criminal history, sexual orientation, membership of any trade or professional associations.

3. Collecting your personal information

The personal information we ask you to provide us with, is personal information that we will use to provide you with our services.

3.1 How does Judo collect your personal information?

The main way we collect personal information about you is when you give it to us, for example, when you complete a form, application or survey or contact us to ask for information.

Judo may also collect your personal information in any of the following ways:

ELECTRONICALLY

1) Social media

If you access a social media page operated by us, the information we collect about you may also include:

- your user ID and/or user name associated with that social media service,
- any information or content you have permitted the third party social media service to share with us, such as your profile picture, email address, followers or friends lists, and
- any information you have disclosed in connection with that social media service.

2) Internet

Website

- Each time you visit our website, we collect information about your use of the website.
- This may be from internet browsing, mobile or tablet applications.

Cookies

- We may use technology called 'cookies' [link to pop-up] when you visit our site.

Pop-up: Cookies can record information about your visit to our site. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved by any non-Judo Capital site.

3) Private messaging

- We may invite you to send your details to us via private messaging, for example, to answer a question about your account.

4) Participation in activities or competitions

You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

3.2 How does Judo collect sensitive information about you?

We will only collect sensitive information from you with your consent.

4. Storing your personal information

4.1 How does Judo store your personal information?

The security of your personal information is important to us.

We take reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

- 1) We store your personal information in different ways, including in paper and in electronic form.
- 2) We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.
- 3) We will not sell or otherwise disclose your personal information to other companies or organisations without your prior consent.

5. Disclosing your personal information

5.1 Can Judo disclose your personal information or credit details?

PERSONAL INFORMATION DISCLOSURE

In order to perform the functions and/or activities described above, we may disclose your personal information to any of the persons or organisations described below:

- 1) our related entities (if any) to facilitate our and their internal business processes
- 2) third party service providers, who assist us in operating our business (including credit reporting bodies and technology service providers) (Note: these service providers may not comply or be required to comply with our privacy policy)
- 3) our related entities and other organisations with whom we have affiliations so that those organisations may provide you with information about services and various promotions
- 4) organisations involved in maintaining, reviewing, upgrading and developing our computer and business systems
- 5) our financial advisers, legal advisers or auditors
- 6) organisations involved in a corporate re-organisation or involved in a transfer of all or part of the assets or business of our organisation
- 7) organisations involved in the payments systems including financial institutions, merchants and payment organisations
- 8) organisations required to assist us discharge our legal requirements (e.g. the provision of a tax file number under the Income Tax Assessment Act, the 'know your client' requirements under the Anti-Money Laundering and Counter-Terrorism Act and the responsible lending and identification requirements under the National Credit Code and associated Land Title, Personal Property and Property Law legislation), or
- 9) as required or authorised by law and/or where you have given your consent.

CREDIT DISCLOSURE

See [Credit Reporting Policy](#) [link] to find out:

- 1) How you may seek correction of credit information we hold about you,
- 2) How you may complain about an alleged breach of our obligations in relation to your credit information
- 3) How we will deal with your complaint
- 4) Whether we will disclose your credit information to any overseas entities.

OVERSEAS RECIPIENT DISCLOSURE

We may disclose your personal information to overseas recipients. Prior to disclosing your personal information to an overseas recipient, we will take all reasonable steps to ensure that:

- 1) The overseas recipient does not breach the Australian Privacy Principles; or
- 2) The overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way the Australian Privacy Principles protect the information; or

- 3) You have consented to us making the disclosure. Acceptance of any of our services via an application in writing, orally or electronic means will be deemed as giving consent to the disclosures detailed herein.

6. Accessing your personal information

6.1 How can you access your personal information?

At any time you can request us to inform you of the personal information we hold about you. We usually respond to you within seven days of receiving your request.

We may refuse to give you access to the personal information we hold about you if:

- 1) we reasonably believe that giving you access would:
 - (a) pose a serious threat to the life, health or safety of an individual,
 - (b) have an unreasonable impact on the privacy of other individuals, or
 - (c) we consider the request to be frivolous or vexatious.
- 2) any of the information we hold about you is inaccurate, out of date, incomplete or irrelevant, please contact us.

If you wish to access or correct any of the personal information we hold about you, please email us at contactus@judocapital.com.au or contact us by phone on 03 9081 3100.

7. Making a complaint

7.1 What can you do if you are not satisfied with the way Judo manages your personal information?

If you are not satisfied with how we manage your personal information you can make a complaint directly to Judo in the first instance. Judo will follow these steps to address and manage your complaint:

- 1) Make a record of your complaint
- 2) Acknowledge your complaint within seven days.
- 3) Take steps to correct any deviation from Australian Privacy Principles.
- 4) Provide you with a decision on your complaint within 30 days.

If you wish to make a complaint about the management of your personal information please email us at contactus@judocapital.com.au or contact us by phone on 03 9081 3100.

If you are dissatisfied with the response of our complaints officer you may make a complaint to:

THE PRIVACY COMMISSIONER WHICH CAN BE CONTACTED ON EITHER
WWW.OAIC.GOV.AU OR 1300 363 992.

8. Changes to this Policy

8.1 How will I find out if any changes are made to this Policy?

This Policy will be updated by Judo at any time, as and when required.

- 1) We may amend or update this Policy at any time.
- 2) Any changes to our Privacy Policy will be publicised on our website.
- 3) This privacy policy came into existence on 1 July, 2016.

You can access the latest and most up-to-date version of our Policy on our Website:
www.judocapital.com.au

9. More information on this Policy

For more information about

1) any issue raised in this Privacy Policy or any other concerns, please contact us:

Phone: 03 9081 3100

Email: contactus@judocapital.com.au

Post: Privacy Officer

c/o Judo Capital Limited

Level 3

40 City Road

SOUTHBANK VIC 3006

2) privacy in general, you can visit the Australian Information Commissioner's website at

www.oaic.gov.au.

9.1 Where can I find out more information on Judo's Privacy Policy?