

DECEMBER 2023.

# Your *Privacy*

We're committed to protecting the privacy of our customers  
and take the protection of your personal information seriously.



**This policy explains how we manage your personal and credit information, including:**

- what information we collect;
- why we collect that information;
- how we use that information;
- how we protect your information; and
- how you can access, update and correct your information.

## **1. What is personal information?**

Personal information includes any information, or an opinion, that could identify an individual or from which an individual be reasonably identified. This includes things like your name, address, date of birth, email address or driver's licence number, and your financial and credit-related information.

## **2. What is credit-related information?**

In this policy, credit-related information is personal information about your credit history which can influence an assessment of your credit worthiness and standing. This includes credit reporting information such as the information we receive from credit reporting bodies in your credit report, information about your past experiences with our funder or other lenders, the kinds of credit products you have applied for (such as credit cards) and how you have managed your commitments including repayments.

## **3. What information do we collect and hold?**

When you apply for one of our products (including a product marketed under a different brand where we assess home loan applications as an Australian Credit Licensee on behalf of our funder) we need your personal information so that we can assess your eligibility for the product you have applied for, and to comply with legal obligations to verify your identity.

**The information we collect directly from you includes:**

- full name, date of birth and contact details;
- identification information such as your driver's licence number, passport details and residency status.
- With your consent, we may also collect biometric information about you (in the form of a selfie you provide) to enable us to verify your identity using the automated digital identity verification provider GBG.
- financial information including your income and expense details;
- marital status and number of dependents;
- (where applicable) details of contracts of sale and property insurance.

**There are other cases where we might collect personal information about you, such as:**

- From our website when you fill in any of our forms.
- From social media forms.
- When you call, webchat or email us directly.

- From other people or organisations, such as joint applicants for a product, our funder, service providers or your employer.
- Tiimely Home may also receive information about you from other parties as part of the credit application process. This includes credit information (refer point 10).

## 4. How do we use your information?

Generally, we only use your personal information to help us assess your credit application. Some specific things we use your personal information for include:

- verifying your identity;
- assessing your application for our home loan products;
- assisting with your questions or complaints;
- necessary business operations, such as record keeping, auditing, performance reporting or training;
- reporting and data analytics, including for regulatory, management, product development and planning and research purposes;
- complying with our legal and regulatory requirements;
- informing you of ways the products and services provided to you could be improved or additional products or services that you may benefit from (refer point 16); and
- marketing products or services.

## 5. When do we share your personal information?

Sometimes we need to share your information outside of Tiimely Home. Some of the third parties we might share your personal information with include:

- our funding partners and our commercial partners who market loans under their own brands (where we assess loan applications on their behalf);
- insurers providing lenders' mortgage insurance or title insurance;
- identity verification service providers;
- information technology companies maintaining our systems and services, including cloud and data warehousing service providers and analytics platforms;
- external advisers such as valuers, lawyers or auditors;
- government, law enforcement and regulatory bodies, as required by law;
- external complaint resolution bodies;
- other joint loan applicants;
- your authorised representatives or advisers or people acting on your behalf.

## 6. Do we send information overseas?

There are seven instances where we store or disclose personal information overseas.

- [Okta](#) is our authentication partner, their technology allows you to have a single sign-in to your Tiimely Home application, and they store your data securely in Germany.
- Our webchat provider, [Livechat](#); they store information provided during your webchat enquiry at their secure hosting facilities in Texas, US.
- [ActiveCampaign](#); they enable us to communicate with you via email once you've made contact with us, and the data may be transferred to ActiveCampaign locations in the US, Australia, and Ireland.
- We use a solution called [Twilio](#), it allows our technology to send you SMS notifications as you progress through your application. Their solution is hosted in the US.
- [Trustpilot](#) allows Tiimely Home to gain valuable insight and feedback from you, our customers, with data stored in the Australia and EU.
- [ThreatMetrix](#), which provides fraud protection to our customers and to Tiimely Home, this information is all encrypted and stored within the US and the Netherlands.
- We also use [Dovetail](#) for customer product research and would request your consent to do that research with you prior to storing any data with them. They are an Australian company that stores their data in the US.
- Tiimely Home also uses various analytics and social media platforms to provide targeted marketing content to new and current customers. We use small subsets of hashed information to tailor content to our website users. To understand how these platforms use your information or to find out how to opt-out of target marketing on these platforms, please refer to each their privacy policies. Tiimely Home uses the following social media platforms:
  - Facebook
  - X (formerly Twitter)
  - LinkedIn
  - Reddit
  - Google Analytics
  - Google Ads

## 7. What online data do we collect?

Whenever you use a website, app, or other Internet service, there is certain information that gets collected about your visit. While we take reasonable steps to keep your information safe when you're browsing our website, it's also important that you follow good online security – like keeping your operating system, browser and anti-virus software up-to-date.

Whenever you use a website, app, or other Internet service, there's certain information that gets created and recorded automatically by the IT systems necessary to operate that site, app or service. The same is true when you use our website.

For example, when accessing Tiimely Home, we use "cookies" (a small text file sent by your computer each time you visit our website, unique to your Tiimely Home account or your browser) to make it easier for you to use Tiimely Home, or so we can record data relating to the pages you viewed and activities you carried out during your visit.

## 8. Tell me more about Cookies

The type of device you're using to access Tiimely Home and the settings on that device may provide us with relevant information to optimise your online experience, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are, and why a crash has happened. What information we can be provided with depends on what type of device you're using and its settings. For example, different types of information are available depending on whether you're using a Mac or a PC, an iPhone or an Android phone.

Cookies allow Tiimely Home to track the performance and usage of our website, monitor advertising campaigns through social media platforms and improve our products and services.

You can find more about how we use cookies, in our [cookie policy](#).

## 9. Unfinished applications

If you start but don't finish an online application, we might use the details you've provided so far to get in touch with you, or to offer help finishing the application. We don't do this to annoy you, but to ensure you get what you need from us. And unlike your mother, you can tell us to go away at any time. Be nice to your mother.

## 10. What credit-related information do we collect and hold?

When you apply for or have a Tiimely Home product, we'll collect and use credit-related information.

The types of credit-related information we collect includes:

- name, date of birth, gender, address (including prior addresses);
- the kinds of credit products you have or have applied for;
- information on credit previously given to you by our funder or other credit providers, including financial institutions, energy or telecommunications companies;
- how you've managed your obligations (which could include details of defaults and repayment history);
- Information in a credit report from a credit reporting body;
- information about your credit worthiness that has been derived from a report about you (such as a credit score);
- details of credit-related court proceedings or insolvency;
- serious credit infringements.

## 11. How do we use and share your credit-related information?

Your credit-related information could be used for a few different things, including:

- assessing credit applications;
- our necessary business operations, including risk management, audit investigations, performance reporting, research and product development and planning.

- Your credit-related information could be shared with organisations including the following:
- our funder;
- our funding partners we utilise through our aggregator AFG where one of our in-house brokers is assisting you with an enquiry for one of the products we have access to;
- to our Lenders' Mortgage Insurer, Helia Insurance Pty Limited ABN 60 106 974 305, trading as Smarter MI.

## 12. Credit reporting bodies

When you apply for one of our home loans we collect credit-related information about you from credit reports provided by credit reporting bodies. That's your credit history.

Dealings with the credit reporting bodies are reciprocal, so our funder (as a credit provider) might also share credit-related information with credit reporting bodies about your credit accounts, including how well you may manage your repayments.

We use the two main credit reporting bodies in Australia: Equifax Australia and Illion Australia. If you're interested in their own privacy and credit reporting policies (which contain information about how they manage your personal and credit information) or want to contact them for any reason, here's how you can get in touch with them:

### Equifax Australia

PO Box 964 North Sydney NSW 2059  
1300 762 207  
[www.mycreditfile.com.au](http://www.mycreditfile.com.au)

### Illion Australia

PO Box 7405 St Kilda Melbourne VIC 3004  
1300 734 806  
[www.checkyourcredit.com.au](http://www.checkyourcredit.com.au)

If you've been a victim of fraud (including identity fraud), or think you might be targeted, you can ask a credit reporting body not to use or share the information they hold about you by getting in touch with them directly.

Sometimes your credit-related information will be used by credit reporting bodies for the purposes of "pre-screening" credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your credit-related information is not used in this way.

## 13. Storage and security of your personal information

We will take reasonable steps to keep the personal information we hold about you secure to ensure that it is protected from misuse, interference, loss, unauthorised access, modification or disclosure. When we don't need your information any more we'll delete or deidentify it, unless we have a legal obligation to retain it.

Your personal information is stored within secure systems that are protected in controlled facilities. Our employees and third party service providers are obliged to respect the confidentiality of any personal information held by us.

## 14. How can you access, update, or correct your information?

In most cases you will be able to gain access to personal and credit-related information about you held by us. Just ask us using the contact details below. We might need you to confirm your identity and there might be some occasions where we refuse to provide you with access (for example, because granting you access would unreasonably impact on someone else's privacy). If we can't provide you with access, we will let you know why in writing.

We assume that any information you give us is correct, but we'll also take reasonable steps to amend or correct information about you to keep it accurate and up to date. If you would like to access your information, update us on any changes, or want to request a correction, [Let's talk](#).

Our funder, Adelaide and Bendigo Bank Limited, has a Credit Reporting Policy that contains information about:

- how you can access and seek correction of your credit eligibility information;
- how you can seek correction of your credit information;
- how you can complain about a breach of the credit reporting laws and how they will deal with a complaint;
- if they disclose your credit information or credit eligibility information to overseas entities, and where practicable, which countries those recipients are located in.

## 15. Can you deal with us anonymously?

We can't process or accept your home loan application unless you identify yourself, which is a legal requirement. That means that we cannot offer you the option of not identifying yourself (or using a pseudonym) when dealing with us.

## 16. Do we use your information for direct marketing?

From time to time we may use your personal information to provide you with marketing materials in relation to offers, specials, products and services that we have available or think you might be interested in. You can opt out of receiving marketing communications from us at any time by following the opt-out instructions provided in the communications to you.

## 17. Our funder and insurers

To provide you with a Tiimely Own Home loan we need to share your personal and credit-related information with our funder and insurer who provides lenders mortgage insurance. We also provide personal information to our title insurer for loans where the Fast Refi process applies:

Bendigo and Adelaide Bank Limited ABN 11 068 049 178 is our funder.

If you want more information about their privacy policy, go forth and read more at <http://www.bendigobank.com.au/public/privacy-policy>.

This outlines how they will manage any personal and credit-related information that we share with them. Helia Insurance Pty Limited ABN 60 106 974 305 trading as Smarter MI is our lenders' mortgage insurer.

If you want more information about their privacy policy and how they will manage any personal and credit-related information that we share with them, read more at <https://helia.com.au/privacy-policy>.

First American Title Insurance Company of Australia Pty Limited ABN 64 075 279 908 trading as First Title is our title insurer.

If you want more information about their privacy policy and they will manage personal information we share with them, read more at <https://www.firsttitle.com.au/contents/privacy-policy/>.

## 18. Our aggregator and other funding partners

Where one of our in-house brokers is assisting you in applying for a home loan, we need to share your personal and credit-related information with our aggregator Australian Finance Group (AFG) and funding partners we utilise through AFG.

If you want more information about AFG's privacy policy and how they manage any personal and credit-related information that we share with them, read more at <https://www.afgonline.com.au/privacy-policy/>.

If approved by a funder through the AFG platform, you will be provided with additional credit guide, privacy and consent information from that funder including how that funder manages personal and credit-related information shared with them.

## 19. Concerns or complaints

If you ever have an issue or complaint regarding your privacy or the way we're using your personal information or credit-related information, [Let's talk](#).

If you do raise an issue with us, we'll address it as quickly as possible, and aim to have everything resolved within 30 days. If you are dissatisfied with our response, you can contact an external body:

### **Office of the Australian Information Commissioner (OAIC).**

If your complaint is about how we handle your personal information or credit-related information, you can contact the OAIC.

**Website:** [oaic.gov.au](http://oaic.gov.au)

**Phone:** 1300 363 992

**Email:** [enquiries@oaic.org.au](mailto:enquiries@oaic.org.au)

**Post:** GPO BOX 5288 Sydney NSW 2001

### **Australian Financial Complaints Authority (AFCA).**

If you have a complaint about the products or services we provide you, get in touch with AFCA.

**Website:** [afca.org.au](http://afca.org.au)

**Phone:** 1800 931 678

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Post:** GPO BOX 3 Melbourne VIC 3001



## 20. Let's Talk

If you have any concerns or questions in relation to how we handle your privacy, or if you would like a printed version of this policy sent to you, Let's talk.

### **Tiimely Home.**

[hello@tiimelyhome.com.au](mailto:hello@tiimelyhome.com.au)

Privacy Officer  
Tiimely Pty Ltd  
GPO Box 1371 Adelaide SA 5001

## 21. Meaning of words

We, us, our or Tiimely Home means Tiimely Pty Ltd ABN 41 605 696 544. In this policy references to "our funder" means Adelaide and Bendigo Bank Limited ABN 11 068 049 178.

You can find out about the business [here](#).

## 22. Changes to the policy

From time to time, it may be necessary for us to review this policy and the information contained in this document. We will notify you of any changes by posting an updated version on our website <https://tiimelyhome.com.au/lets-talk>.