

# Credit Guide

August 2023



This credit guide provides you with the key information you need to know to make an informed and confident choice when engaging our services. We are licensed to arrange loans and leases under the National Consumer Credit Protection Act 2009 (NCCP Act). The NCCP Act regulates the activity of lending, leasing, and finance broking.

## Key Information

**Licensee:** Apple Road Pty Ltd (ACN 123 503 29) t/as Mortgages Money and Me – Australian Credit Licence 384721.

**Postal Address:** PO Box 28, Ballajura, Western Australia, 6066.

**Your Credit Representative :** Ronelle (Roni) Gors, ph 0408 451 336, [roni@mmme.com.au](mailto:roni@mmme.com.au).

**Broker Group:** Pennley Pty Ltd (ACN 071 979 498) as trustee for the Pennley Unit Trust t/as Choice Aggregation Services. Credit Representative Number 392528.

## Services we Provide

We will provide you with information on a range of lenders and products. Once you have chosen a loan or lease that is suitable for you, we will help you to obtain an approval.

## Our Associations and Relationships

Below are the six lenders with whom we conducted the most business with in the last financial year:

- **Commonwealth Bank**
- **Bankwest**
- **Macquarie**
- **St George**
- **ING Direct**
- **Westpac**

Our current panel includes the following lenders:

Adelaide Bank, AMP, ANZ, Australian Financial (HLCA), Auswide, Bank First, Bank of China, BOQ, BankWest, Better Choice, Beyond Bank, Bluestone, Bridgit, Brighten, Commonwealth Bank, Firefighters Mutual Bank, FirstMac, Go Beyond, Granite Home Loans, Health Professionals Bank, Heartland Seniors Finance, Heritage, ING Direct, Keystart, LaTrobe Financial, Latitude, Liberty Financial, Macquaire Bank, ME Bank, NAB, Pepper Money, Plenti, PN Bank, Resimac, St George Bank, Suncorp, Teachers Mutual Bank, UBank, Unibank, Virgin Money, Westpac.

We obtain mortgage aggregation services from the Broker Group detailed above. The Broker Group provides services at arm's-length to our business which include IT systems, loan information and lodgement systems, training and development, commission processing, conferences and professional development events, and assistance with regulatory and compliance obligations.

In consideration of the services the Broker Group gives us, we pay fees to the Broker Group or the Broker Group retains some of the commission panel lenders pay on loans we arrange. We have access to Broker Group panel of lenders including Broker Group branded products.

## Acting in your Best Interests

When providing credit assistance, we are obliged to act in your best interests (Best Interests Duty). This means that any products we recommend to you must be in your best interests, and the reasons for these recommendations will be documented, recorded, explained and provided to you. To ensure your best interests have been met, we will assess what product(s) and what credit assistance will be in your best interests.

This recommendation will include information about why this is in your best interests and how it is aligned to your needs and objectives.

In the case of actual, potential, or perceived conflicts of interest, we will disclose these to you and prioritise your interests ahead of our own in all circumstances. This includes giving priority to your interests in situations where we know, or ought to reasonably know there is a conflict between the interests of you and the interest of ourselves or a third party.

## Our Responsible Lending Obligations

Under the NCCP Act, we are obliged to ensure that any loan, or principal increase to a loan, we help you to obtain, or any lease we help you enter, is not unsuitable for your needs and objectives. To decide this, we will need to ask you some questions to assess whether the loan or lease meets these requirements.

The law requires us to:

- Make reasonable enquiries about your requirements and objectives

- Make reasonable enquiries about your financial situation
- Take reasonable steps to verify that financial situation

Credit will be unsuitable if at the time of assessment it is likely that at the time the credit is provided:

- You could not pay or only pay with substantial hardship
- The credit will not meet your requirements and objectives

For example, if you can only repay by selling your principal place of residence, it is presumed that the loan will cause substantial hardship unless the contrary is proved. For this reason, we must ask you to provide a significant amount of information. It is therefore very important that the information you provide us is accurate, complete and up to date.

We must provide you with a copy of our preliminary credit assessment of your application if you ask within 7 years of when we assist you. We are only required to give you a copy of the credit assessment if we give you credit assistance.

## Our Fees and Charges

Generally, no fees or charges are payable by you to us for our credit assistance. In some instances, a fee for service may be required. Details of these fees will be set out in a Credit Quote.

You may be charged a lender's application fee, valuation fees and other fees associated with the loan. These fees are not charged by us and will be disclosed to you prior to submission of the credit application. Please note that if a valuation is conducted and you choose not to proceed with the loan, you may be liable for the valuation fees.

## Commissions

We may receive commissions from the lenders and lessors who provide finance for our customers. These are not fees payable by you. The percentage of the commission varies, however generally ranges between 0.60% and 0.75%. We will provide you with full details on the nature and amount of these commissions and you can obtain additional information about this by asking us.

## Referral Commissions

We source referrals from a broad range of sources. For example, we may pay fees to call centre companies, real estate agents, accountants, or lawyers for referring you to us. These referral fees accord with usual business practice and not payable by you. We will disclose the nature and amount of these and you can obtain additional information about these commissions by asking us. We may also receive a benefit for referring you to other specialist service providers.

## Volume Bonus Arrangements

We do not receive any volume based benefit for residential home loan products. However, from time to time we may receive a benefit, directly by way of cash bonus or additional commissions or indirectly by way of training, professional development days or sponsorship, if we or our Broker Group write a particular volume of loans offered by lenders for products such as commercial and lease products.

## Our Internal Dispute Resolution Scheme

We hope you are delighted with our services, but if you have any complaints please contact us using the details in the Key Information section above.

You should explain the details of your complaint as clearly as you can. You may do this verbally or in writing. When we receive a complaint, we will attempt to resolve it promptly. In cases where your complaint will take longer than 30 days to resolve, we will notify you in writing.

## Our External Dispute Resolution Scheme

### Australian Financial Complaints Authority

If your complaint has not been resolved to your satisfaction, you may contact the Australian Financial Complaints Authority (AFCA), which is an independent dispute resolution scheme for financial services complaints.

<b>Telephone</b>	1800 931 678
<b>Email</b>	<a href="mailto:info@afca.org.au">info@afca.org.au</a>
<b>Post</b>	GPO Box 3, Melbourne VIC 3001
<b>Website</b>	<a href="http://www.afca.org.au">www.afca.org.au</a>

## Things You Should Know

We don't make any promises about the value of any property you finance with us or its future prospects. You should always rely on your own enquiries.

We don't provide legal or financial advice. It is important you understand your legal obligations under the loan and the financial consequences. If you have any doubts, you should obtain independent legal advice before you enter any loan contract.

We represent lenders and have obligations to them, and in particular, to not provide any information we know is misleading or deceptive. We also have obligations under the law to report any fraud, forgery, or other illegal activities. Before using our services, it is important that you understand that we have these obligations to lenders, and under the law.



# Privacy Statement

August 2023

We need to collect personal information about you to provide you with our broking & related services. This privacy statement tells you how we collect your information, what we use the information for and who we share the information with. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

## How information is collected from you

We will collect information from you directly whenever we can, such as from enquiries we make of you when you seek credit assistance from us. This may be in person, over the phone or via digital channels. We may verify that information from sources referred to in the responses to those enquiries or in this privacy statement.

## How information is collected from other sources

Sometimes we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- we collect information from third parties about a loan or lease in relation to which you seek our services;
- we can't get hold of you and we rely on public information to update your contact details; or
- we exchange information with your legal or financial advisers or other representatives.

## When the law authorises or requires collection of information

Some law may require us to collect personal information about you. For example, we may require your information to verify your identity under Australian Anti-Money Laundering law.

## How your information may be used

We may use your information for purposes including:

- giving you credit assistance;
- giving you information about loan products or related services including help, guidance and advice;
- considering whether you are eligible for a loan or lease or any related service you requested including identifying or verifying you or your authority to act on behalf of a customer;

- assisting you to prepare an application for a lease or a loan;
- administering services we provide, for example, to answer requests or deal with complaints;
- administering payments we receive, or any payments we make, relating to your loan or lease;
- telling you about other products or services we make available and that may be of interest to you, unless you tell us not to;
- identifying opportunities to improve our service to you and improving our service to you;
- telling you about other suppliers, with whom we have arrangements, that supply goods or services that may be of interest to you;
- allowing us to run our business efficiently and perform general administrative tasks;
- preventing or investigating any fraud or crime or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- any purpose to which you have consented.

You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will process your request as soon as practicable.

## What happens if you don't provide information

If you don't provide your information to us, it may not be possible to:

- assist in finding a loan or lease relevant to your circumstances;
- verify your identity or protect against fraud; or
- let you know about products or services that might be suitable for your financial needs.

## Types of information we may access

Mortgages, Money and Me and its representatives will generally seek 'personal information' and 'financial information' about you.

Personal information is any information from which your identity is reasonably apparent, which may include information or an opinion about you, your name, date of birth, address, account details, occupation and any other information which we may require to identify you.

Financial information is that which we utilise to assess your suitability for a credit product or to assist you in applying for a credit product. Examples of this information include any finance you may have outstanding, your repayment history in respect of these loans, as well as details of your employment, income and expenses.

In certain circumstances, we may also be required to collect 'sensitive information' (such as health information) on behalf of the lender in the course of giving you credit assistance.

## Services without your personal information

Generally it will be necessary for us to identify you in order to assist you with finding a product that meets your needs, however, where it is lawful and practicable for us to do so we will allow you to conduct business with us to the full extent possible without providing us with your personal information such as making general enquiries about promotional offers.

By providing your information to us, we take this as confirmation that you consent to your information being used in accordance with our privacy policy.

## Information about other people

If you give information to us about another person (like your co-applicant) in relation to the services we provide, you will let that other person know that:

- we have collected their information to provide those services or for any other purpose set out in this privacy notice;
- we may exchange this information with other organisations set out in this privacy notice;
- we handle their personal information in the way set out in our Privacy Policy and this privacy notice and they can:
  - access or request a copy of that privacy policy or this privacy notice; or
  - access the information we hold about that other person,
  - by using our contact details below; and
- we may not be able to provide those services to you unless we obtain their information.

## Sharing Your Information

### General

We may use and share your information with other organisations for any purpose described above.

### Sharing with your representatives and referees

We may share your information with:

- your representative or any person acting on your behalf (for example, lawyers, settlement agents, accountants or real estate agents); and
- your referees, like your employer, to confirm details about you.

### Sharing with third parties

We may share your information with third parties in relation to services we provide to you or goods or services in which we reasonably consider you may be interested. Those third parties may include:

- the Broker Group through whom we may submit loan or lease applications to lenders or lessors on the Broker Group's panel. You can view our Broker Group's privacy notice at <http://www.choiceaggregationservices.com.au/privacy>. It sets out how that Broker Group manages your personal information and where you can find its privacy policy;
- referrers that referred your business to us;
- financial services suppliers with whom we have arrangements;
- valuers;
- lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries;
- mortgage insurers;
- organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;
- government or regulatory bodies as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- guarantors and prospective guarantors of your loan or lease;
- service providers, agents, contractors and advisers that assist us to conduct our business for purposes including, without limitation, storing or analysing information;
- other organisations that assist us such as printers, mailing houses, lawyers, debt collectors, accountants and other auditors;
- any organisation that wishes to take an interest in our business or assets; and
- any third party to which you consent to us sharing your information.

## Sharing outside of Australia

We may use overseas organisations to help conduct our business. As a result, we may need to share some of your information (including credit information) with such organisations outside Australia. The countries in which those organisations are located are:

- United States of America
- India
- Ireland
- Republic of the Philippines

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

## Security of your personal information

We take reasonable steps to ensure the security of your personal or company information from unauthorised access, theft or modification.

In the extremely unlikely event that we suspect that there has been a data breach that may cause you serious harm, we will take all reasonable steps to assess if your data has been accessed or lost, and if this information being accessed or lost may cause you serious harm. This assessment will always be completed expeditiously and within 30 days.

If we find that there has been a data breach that has the potential to cause you serious harm, this will be reported to the Office of the Information Commissioner and you directly.

## Ongoing Communication

From time to time, we may contact you with industry updates and information about products from either ourselves or our industry affiliates that we believe may interest you. To opt-out of receiving such information, simply let us know by contacting us directly using the office details below.

## Access and alterations to your personal information

You can gain access to your personal or company information or advise alterations to that information by contacting our office:

**Post:** PO Box 28, Ballajura, Western Australia, 6066

**Tel:** 0408 451 336

**Email:** [roni@mmme.com.au](mailto:roni@mmme.com.au)

**Web:** <http://www.mmme.com.au>

Information which is easily accessible will be provided to you free of charge. However, information which is more difficult to access may have a fee associated with the request.

## Privacy Policy

You can find out more about how we manage your information by reading our Privacy Policy available by contacting us. Please see our contact details above. [Also, you can read and obtain a copy of that policy at our website address set out above.] Our Privacy Policy sets out how you can ask us to access and seek to correct information we hold about you and how you may complain against us about a privacy issue.

## Feedback on the handling of your personal information

Should you be unsatisfied in the manner in which we have handled your personal information please contact us (per details listed above). We will take all necessary steps to investigate and address your concerns. If the issue you have raised is not resolved to your satisfaction you should contact the Federal Privacy Commissioner at:

### Office of the Privacy Commissioner

**Post:** GPO Box 5218, SYDNEY, NSW, 2001.

**Tel:** 1300 363 992

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

You can learn more about the Privacy Act and your rights at [www.privacy.gov.au](http://www.privacy.gov.au)

By providing this information, you agree that we may collect and use your personal information as specified above.