

Our commitment to you

We are focused on protecting your privacy and personal information. This policy is designed to provide you with general information about how we collect, store, use and disclose your personal information.

This policy also includes our Collection Statement for your review and acceptance before we deal with your personal information, and our credit reporting policy, which covers additional information on how we manage your personal information collected in connection with a credit application or a credit facility.

We are committed to protecting your privacy and to abide by the Australian Privacy Principles (APPs) for the protection of personal information, as set out in the Privacy Act 1988 (Cth) (Privacy Act) and the Privacy (Credit Reporting) Code (CR Code), which outline how we should treat your personal information. In compliance with the CR Code, this document also contains a statement of 'notifiable matters'. This is further explained below.

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

- what personal information we collect;
- why and how we collect your personal information;
- how we use and protect your personal information;
- when we share your personal information;
- how your personal information is gathered online;
- how to access and correct your personal information;
- how to contact us and how to escalate any concerns or complaints regarding privacy.

About Athena

Athena lightens the loan for Australians reducing their mortgage life sentence.

Our super friendly loan experts, innovative technology and ground-breaking products gives Australians all the tools they need to save themselves thousands of dollars and years off their home loan.

Athena are changing how home loans are funded so we can pass on direct savings to both our customers and investors.

Because life is too short for a long home loan.

This document is the Privacy Policy of Athena Mortgage Pty Ltd ABN 24 619 536 506.

Athena Mortgage Pty Ltd is a credit provider and a holder of Australian Credit Licence number 502611.

In this document, 'Athena' 'we', 'us' and 'our' are references to Athena.

Collection statement

The law requires us, Athena Mortgage Pty Ltd (**Athena**), to notify you of certain things regarding the collection of your personal information.

We only collect your personal information from you or from your joint borrower(s) or joint applicant(s) online, via documents provided by email or by phone. If you give us personal information about a joint borrower or joint applicant we rely on you telling them so, and pointing them to our Privacy Policy to explain how we handle their Information.

We exchange personal information with credit reporting bodies (CRBs) to obtain from them a consumer and commercial credit report about you. With the introduction of Comprehensive Credit Reporting (CCR) credit reports will contain both positive and negative bureau information on your credit history, refer more below regarding CCR. We exchange personal information with outsourced service providers, such as property valuers, so that they can assess your selected home loan, and other entities, including real estate agents involved in the sale or purchase of your property. We also exchange personal information with your or our advisors, your accountant, and any organisation providing online or in person verification of your identity. We may share or exchange Information with third parties that operate outside of Australia, and as and when we do, we will update our Privacy Policy to refer to them. If you don't provide the information in full we won't be able to continue with your application.

This privacy policy below tells you more about how we use and how to access or correct your personal information, and contains credit reporting guidelines, including how to contact the CRBs we use, or lodge complaints about breaches of privacy, as well as what happens if you fail to meet your repayments or commit a serious credit infringement, and what happens if you believe you may be a victim of fraud.

Your personal information

What is personal information?

Personal information includes any information or an opinion about someone's identity that is apparent or can reasonably be ascertained. Things like your name, address, date of birth, email address, account details, occupation or driver's licence number are examples of personal information that we may collect from you. We may also collect details such as the ages and numbers of your dependents and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses. If you would like to know exactly what personal information means, please [refer to the Privacy Act](#).

You may need to provide personal information about other individuals to us (for example, about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them that we can be contacted for further information (see 'How to contact us' at the end of this policy).

What will happen if you do not provide your personal information to us?

Generally speaking, if we request personal information about you (such as your date of birth) and you do not provide it, we may not be able to provide you with the product or service that you request. In addition, if we are required to comply with certain legislation to provide you with the products and services you choose, then collection of certain personal information will be mandatory.

Dealing with us by not identifying yourself

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you. However, you have the option of not identifying yourself (or using a pseudonym) when dealing with us, for example, when you make general enquiries about our business or promotional offers.

Tax file numbers

When you provide us with documents, the documents may contain your tax file number. While we may come to know your tax file number, we do not adopt a government related identifier (such as tax file numbers or driver's licence numbers) as a means of identifying you. Use and disclosure of tax file numbers are strictly regulated by tax laws and the Privacy Act.

What is sensitive information?

Sensitive information is a subcategory of personal information. This is any information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

We may collect, use, hold or disclose sensitive information about you, such as about your health, in certain circumstances. We will only collect sensitive information about you with your consent and

if that sensitive information relates directly to our ability to arrange or provide credit to you or manage the credit provided to you (for example, in assessing hardship applications).

What is credit related information?

Credit-related information is a sub-set of personal information relating to credit that has been provided to you or that you have applied for. It may include any finance you have outstanding, your repayment history for any current or prior debts, and any defaults. 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 us or other lenders, the kinds of credit products you have applied for (such as credit cards), dates accounts are opened and closed, the credit limit and how you have managed your commitments.

When we collect your credit information, we may provide more details on how we manage your credit information.

If you would like to know exactly how 'credit information' and 'credit reporting information' are defined in the Privacy Act, you can access a [copy of the legislation here](#).

About credit information and 'notifiable matters'

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information. You may request to have these notifiable matters (and this policy) provided to you in an alternative form, such as a hard copy.

We exchange your credit information with CRBs. We use the credit information that we exchange with the CRBs to verify you and to assess your creditworthiness, assess your application for finance and manage your finance. If you fail to meet your payment obligations in relation to any finance that we have provided or arranged, or you have committed a serious credit infringement, we may disclose this information to a CRB.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. We explain how you can do this below.

Sometimes, your credit information will be used by CRBs for 'pre-screening' credit offers on the request of other credit providers. You can contact the CRB at any time to request that your credit information is not used in this way.

You may contact the CRB to advise them that you believe that you may have been a victim of fraud. For 21 days after the CRB receives your notification, the CRB must not use or disclose that credit information. The CRB we deal with is:

- Equifax Australia (previously Veda) equifax.com.au

What is unsolicited information?

Sometimes people share information (including sensitive information) with us we have not sought out. If we receive unsolicited personal information about you, we will determine whether we would have been permitted to collect that information. If so, then we will handle this information the same way we do with other information that we seek from you. If not and the information is not contained in a Commonwealth record, then we will destroy or de-identify it as soon as practicable, but only if it is lawful and reasonable to do so. Often, it is not possible for us to neatly unbundle this information then destroy or de-identify only certain sections or parts of it, and we may need to store this information for future use, such as to help resolve disputes between us or assess future applications by you.

Collecting your information

Why we collect (and keep) your personal information

When you apply for one of our products or request a service, we need to get to know you, so we collect your personal information (which includes credit-related information). We do this for the main purpose of assessing your application for finance and managing that finance, as well as for our internal operations, including risk management and portfolio analysis. We may also collect your personal information for the related purposes such as direct marketing and managing our relationship with you.

Such information may include:

- name, date of birth, address (including prior addresses);
- the kinds of credit products you have or have applied for;
- information on credit previously given to you by us 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 CRB;
- 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; and
- serious credit infringements.

How we collect your personal information

We collect this information in a number of ways, including:

- directly from you, for example, when you submit your personal details through our online platform, provide information in writing (such as by email or via documentation), or provide information by phone;
- from joint applicants to your home loan, where one applicant has entered information into the application on behalf of all applicants and it is therefore unreasonable or impractical for us to also collect that information directly from you;

- from third parties such as CRBs, providers of surveys, competition or marketing related services, related companies, your employer or your representatives. If we obtained your personal information through any of these methods and you would like a list of these entities or websites, or if you feel you have not given us consent to use your details, please contact us;
- any external parties where you have asked them to provide your personal information to us;
- from publicly available sources of information;
- from our own records; and
- when you visit any of our online platforms.

Using and protecting your personal information

How we use your personal information

Generally, as mentioned above, we use your personal information mainly to assess your application for finance and managing that finance, as well as for our internal operations.

Your personal information may be used to:

- verify your identity;
- assess your application for our home loan products;
- assisting you where online applications are not completed;
- provide the products and services you require;
- administer and manage (including the on-going management of) those products and services such as matters relating to making payments;
- conduct appropriate checks for credit-worthiness and for fraud;
- help us manage our relationship with you, including, for example, dealing with any feedback, disputes or enquiries;
- report on and provide data analytics, including for regulatory, management and research purposes;
- enable record keeping and audit;
- comply with our legal and regulatory requirements;
- inform you of ways the products and services provided to you could be improved or additional products or services that you may benefit from; and
- market products or services (explained below).

Use of your personal information for 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. We may offer you products and services by various means, including by post, telephone, email, SMS or other electronic means such as social media or targeted advertising. You can opt out of receiving marketing communications from us at any time by following the opt-out instructions provided with the communication.

We will not use or disclose sensitive information about you for direct marketing purposes unless you have consented to that kind of use or disclosure.

Third parties

With your consent, we may disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time.

Third party marketing service providers may combine the personal information we disclose to them with information they already hold about you, in order to provide you with more relevant advertising about our or their products and services.

How safe and secure is your personal information with us?

We take great care with your personal information. Our aim is to ensure that any details are securely protected from misuse, interference and loss, and from unauthorised access, modification or disclosure. Athena is focused on maintaining or bettering industry standard technology and procedures in respect to our information management and provision of online services via encryption techniques and virus protection. We also do or have the following:

- identity management and confidentiality requirements for our employees;
- encryption of some sensitive data;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems on our website.

We take protecting the security of your personal information seriously. We will follow the Office of the Australian Information Commissioner's (OAIC) guidelines to contain, assess and respond to suspected data breaches in a timely fashion and to help mitigate potential harm to affected individuals.

When we no longer require your personal information, and we are legally permitted to, we take reasonable steps to destroy or de-identify the information.

Sharing your personal information

When we share your personal information

Sometimes we need to share your information with external parties in order to deliver the products or services you require. You can be confident that we only share personal information with third parties that we believe have the appropriate systems in place to look after your personal information. Generally, these providers must also comply with the Privacy Act and with our Privacy Policy as well as the privacy obligations under contractual arrangements.

Some of the third parties we might share your personal information with include:

- our funding and prospective funding partners and any investors;
- our external business, marketing and technology services providers, such as for printing, mailing, billing, debt recovery, research and similar business needs;
- your employer, referees or identity verification service providers;
- payment systems operators;

- external advisers such as valuers, lawyers, auditors and similar professionals;
- insurers, including Lenders Mortgage Insurance (LMI) providers for the purpose of deciding whether to provide LMI in connection with your mortgage and for the purpose of administering any claims;
- comparison sites, mortgage brokers or providers of investment, finance or credit where it is legal for us to do so;
- Australian Government's Document Verification Service and CRBs to compare identification details you provided against online government records and/or your credit information, and/or to verify your identity for the purposes of the anti-money laundering and counter-terrorism financing legislation;
- government and regulatory bodies, as required by law;
- external dispute resolution bodies;
- CRBs (see more below);
- fraud bureaus or other organisations to identify and prevent fraud or misconduct;
- other financial institutions or credit providers;
- law enforcement or similar agencies, such as where we are required or authorised by law or where we have a public duty to do so; and
- your authorised representatives or advisers or people acting on your behalf.

Sharing your information with CRBs

We may disclose information about you to a CRB when you are applying for credit, you have obtained credit from us, or if you guarantee or are considering guaranteeing the obligations of another person to us. When we give your information to a CRB, it may be included in reports that the CRB gives other organisations (such as other lenders) to help them assess your credit worthiness.

The introduction of CCR means credit reports could record both positive and negative credit information on your credit history. CCR could benefit those with positive credit histories by highlighting good behaviour, whereas other information may reflect adversely on your credit worthiness, for example, if you fail to make payments or if you commit a serious credit infringement (like obtaining credit by fraud). That sort of information may affect your ability to get credit from other lenders. You can find out more about CCR from [CreditSmart](#).

Do we share your personal information overseas?

Some of the above external organisations and entities may be located or operate outside of Australia. You should note that while overseas organisations will often be subject to confidentiality or privacy obligations, they may not always follow the particular requirements of Australian privacy laws. In the event that a disclosure is made in an overseas country, the information will not be protected by the APPs, and you will not be able to hold us accountable or seek redress under the Privacy Act if the overseas organisation breaches the APPs. In any event, by providing your details, you consent to your information being disclosed in this manner. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we are not responsible for that disclosure.

Rest assured, we will not sell your information to any party outside of Athena and any related bodies corporate.

We will not share any of your credit information with a CRB, unless it has a business operation in Australia. We store your information in

the Cloud and other types of networked or electronic storage. It is not always practicable to know in which country your information may be held.

Online personal information

Staying safe online

Athena is constantly focussed on keeping your information safe while you're browsing our websites or apps. You should also follow good online security like keeping your operating system, browser and anti-virus software up-to-date as well as employing good password management and storage techniques.

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 websites.

Information we collect about you online and how we use that information

When accessing any Athena website, we use 'cookies' (a small text file sent by your computer each time you visit our websites, unique to your Athena account or your browser) to make it easier for you to use our sites, or so we can record data relating to the pages you viewed and activities you carried out during your visit. We may use this information to improve your experience with us.

When you visit our websites or related landing pages to read, browse, submit or download information, our system will record/log information such as your Internet protocol address (or 'IP address'), date and time of your visit to our site, the pages viewed and how you navigate our websites, and any information downloaded. We may automatically collect non-personal information about you such as the site from which you linked to our websites. In some cases, we may also collect your personal information through the use of cookies.

You can configure your browser to refuse cookies or delete existing cookies. Rejecting cookies may have the effect of limiting access to or functionality of parts of our websites.

Where you access third party websites via a link from our websites, we may also collect or have access to that information as part of our arrangements with those third parties.

We may advertise on other websites you visit and we may collect information from these sites on your browser type, the date and time of your visit and the performance of their marketing efforts.

When you access our websites after viewing one of our advertisements on another website, the advertising company may collect information on how you utilise our websites (e.g. which pages you view) and whether you commenced or completed an online application.

We may use cookie information to display targeted advertisements or content on our websites, and also on third party networks and websites such as Google and Facebook. We may use remarketing tools such as Google AdWords to tailor our marketing to (for example) better suit your needs and only display advertisements that are

relevant to you.

We may also use cookies for purposes such as site usage analytics, auditing and reporting, as well as content and 'advertising/marketing personalisation'. We may share any data collected from cookies with third parties to provide you with relevant advertising when browsing third party websites.

Online applications

If you start but don't finish an online home loan application, we might use the details you provide to get in touch with you, or to offer help finishing the application if needed.

You can also save online applications, so you can complete and submit the applications at a later time. If you suspend or save your application, the information that you have entered will be retained in our systems so that you may recover the information when you resume your application. Online applications that have been suspended or saved may be viewed by us.

Accessing and correcting your personal information

How do you access and correct your personal information?

We assume that any information you give us is correct, however we'll also take reasonable steps to amend or correct information about you to keep it accurate and up to date. The information we hold about you is yours to access and correct, and as such we can provide you with general information, such as your name, address and contact details quite easily once you have identified yourself. More detailed information may take longer and involve a fee to cover the costs of retrieving and supplying the details you want. The fee will not be excessive and will not apply to the making of the request. If you need to access your detailed information, first get in contact with us to discuss what you want to access or change.

It is important that the information we hold is accurate and up to date. In this, we ask that you contact us whenever there are any changes to your personal details, so that we can update our records.

There may be some situations in which we are not required to give you access to your personal information. If we don't give you access or allow you to correct your personal information, we will give you a clear explanation in writing of the reasons why except when it would be unreasonable to do this. We will also provide you with the information on how you can complain about the refusal of access.

Additional things we have to do to correct your credit information

If you ask us to correct credit information, we will help you with this in the following way.

Helping you manage corrections

Whether we made the mistake or someone else made it, we are

required to help you ask for the information to be corrected. So we can do this, we might need to talk to others. However, the most efficient way for you to make a correction request is to send it to the organisation that made the mistake.

Where we correct information

If we are able to correct the information, we will let you know within five business days of deciding to do this. We will also let the relevant third parties know as well as any others you tell us about. If there are any instances where we cannot do this, then we will let you know in writing.

Where we cannot correct information

If we are unable to correct your information, we will explain why in writing within five business days of making this decision. If you have any concerns, you can access our external dispute resolution scheme or make a complaint to the Office of the Australian Information Commissioner (OAIC).

Time frame for correcting information

If we agree to correct your information, we will do so within 30 days from when you asked us, or a longer period that's been agreed by you.

If we cannot make corrections within a 30 day timeframe or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter.
- ask you to agree in writing to give us more time.
- let you know you can complain to our external dispute resolution scheme or the OAIC.

How do we keep your credit information safe?

We take great care with your information, both personal and credit. Our aim is to ensure that any details are securely protected from misuse, loss, unauthorised access, modification or disclosure. In the same way Athena keeps your personal information safe (as described earlier in this Privacy Policy) we will maintain the same high standards for your credit information.

Getting in touch

Concerns or complaints

If you have a complaint about how we handle your personal information, you should get in contact with us as soon as possible,

and you are also welcome to write to the Athena Privacy Officer at the contact address below. We will investigate your issue as quickly as possible. If you are not satisfied, you can then refer your complaint to the Office of the Australian Information Commissioner (OAIC) – call 1300 363 992 or go to oaic.gov.au.

Australian Financial Complaints Authority (AFCA)

If you have a complaint about the products or services we provide you or the way we handle your credit-related information, get in touch with AFCA on 1800 931 678, or visit www.afca.org.au.



Call us 8am to 8pm AET Weekdays
or 10am to 4pm AET Sat & Sun
13 35 35



Visit our website at
athena.com.au



Email us at
hello@athena.com.au



Write to us at
Athena Mortgage Pty Ltd
GPO Box 1624, Sydney NSW 2001

How to contact us

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 us know.

To contact Athena, you can:

Electronic communications

Where you consent, then we may provide any document to you electronically, either by displaying them on-screen or emailing them to you. This could include your credit contract (including related disclosures), home loan and other documents we are required to provide such as credit guides and notices. Before consenting, you should understand that:

- Paper versions of these documents may no longer be given;
- You should regularly check your electronic communications, such as email accounts, for documents we may have sent you; and
- You may withdraw your consent to receive documents electronically at any time by contacting us.

We may also, where you consent, require you to digitally sign documents, such as your credit contract and home loan.

You also confirm that you have the facilities to print any notice or document that we send you by email, if desired.