

PRIVACY POLICY MANAGEMENT OF CREDIT INFORMATION

We recognise the importance of your privacy and understand your concerns about the protection of matters relating to your personal credit history and credit worthiness. We comply with the Credit Reporting Regime and the Credit Reporting Privacy Code (**CR Code**) as contained in the Privacy Act 1988 (Cth).

The Credit Reporting Regime and the CR Code specifically detail how we must treat credit information and credit eligibility information in your personal credit file. This policy details how we manage credit information and credit eligibility information about you.

1. What credit information we collect and hold

We will collect credit information from you or about you, if:

- you apply to borrow funds from us; or
- you are or propose to become a guarantor for someone else's borrowings with us.

The types of credit-related personal information we commonly collect and hold from you or about you may include:

- Identification Information such as: your name, date of birth, address, occupation, gender, drivers licence details, passport details and current and previous residential address;
- income and assets information;
- existing credit liabilities, limits, types and providers;
- previous credit payments, repayments, terminations and defaults;
- current and previous court proceedings information, credit infringement information, insolvency actions against you and publicly available credit information;
- scores, ratings, summaries, evaluations and other information relating to your credit worthiness.;
- financial hardship information.

This credit information may relate to both consumer and/or commercial credit.

2. What credit eligibility information we hold

We hold reports and information disclosed to us by a credit reporting body (such as Equifax, Dunn & Bradstreet or Creditsafe/Creditorwatch). We also compile our own, internal credit file about you on the basis of such information. This information relates to an assessment of your personal credit worthiness.

3. How we collect and hold credit information and credit eligibility information

We will collect credit information directly from you from your correspondence with us, and from completed application forms, identification check forms and contracts that you submit to us. We will also collect credit information about you from specific requests that we make to credit reporting bodies.

In some instances, we may receive credit information about you from other credit providers with whom you deal and from the credit referees you have nominated. Credit eligibility information will be disclosed to us by credit reporting bodies in response to our request.

4. Why we collect, hold, use and disclose credit information and credit eligibility information

If you are a borrower or potential borrower of RMBL funds, we collect, hold, use and disclose credit information and credit eligibility information about you for the purposes of assessing your loan application, and for collecting overdue payments.

We may also disclose the credit information and credit eligibility information of borrowers to third parties (such as regulatory bodies including the Australian Securities and Investment Commission) where required or permitted by law, independent valuers undertaking an assessment of the current and/or future market value of a property for the purposes of you obtaining finance from us and to Investors in our Fund/s, for the purposes of assisting the potential Investor to make a decision as to whether to invest their funds into a Loan.

Such information that would be disclosed would include:

- your name;
- property information;
- your reason / purpose for borrowing funds; and
- your previous experience or ability to complete projects undertaken.

If you are a guarantor or proposed guarantor for someone else's borrowings, we collect, hold, use and disclose credit information and credit eligibility information about you for the purpose of assessing your suitability as a guarantor, and (if necessary) for enforcing the guarantee and collecting payments owed to us.

We will disclose credit information about you to credit reporting bodies for purposes related to assessing your credit worthiness, and reporting on payment defaults. For borrowers and guarantors, we may disclose credit eligibility information to other credit providers and to other guarantors, where we have obtained your consent.

5. Overseas Disclosure

We may disclose certain credit information and credit eligibility information about you to Investors in our Fund/s who are located overseas. However, we will only do so where:

- it is for the purpose of assisting the potential Investor to make a decision as to whether to invest their funds into a loan of which you are a part; or
- it is otherwise permitted by law.

We can provide you with a listing of the overseas countries involved in each loan upon request.

In some circumstances, we may share credit-related information with third parties who may operate outside of Australia, this includes recipients in the United States, New Zealand and India. Before disclosing any credit information to an overseas recipient RMBL takes reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles (APPs) contained within the Privacy Act 1988 (Cth) (Privacy Act) or is bound by a substantially similar privacy scheme

6. How we hold and store credit information and credit eligibility information

Your credit information and credit eligibility information are held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for credit information and credit eligibility information and take reasonable steps to ensure that your credit information is protected from misuse, interference, loss and unauthorised access, modification and disclosure:

- Data held and stored on paper is stored within secure key-card premises with monitored alarms.
- Data held and stored electronically is protected by internal and external firewalls, and our electronic databases require passwords for access.
- Access to credit information and credit eligibility information is restricted to staff and contractors whose job description requires access. Our employees and contractors are contractually obliged to maintain the confidentiality of any credit information and credit eligibility information held by us.
- Data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards.
- Our staff receive regular training on privacy procedures.

7. Destruction and De-identification

We will retain credit information and credit eligibility information whilst it is required for any of our business functions, or for any other lawful purpose. Credit information and credit eligibility information about you is destroyed or permanently de-identified in accordance with practices detailed in our general Privacy Policy.

8. Requests for access and correction

We have procedures in place for dealing with and responding to requests for access to, and correction of, the credit information and credit eligibility information held about you. Your request for access should include a detailed description of the information required, including enough information so we can verify your identity and, if necessary, your right to the information.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please contact us.

To assist us to keep our records up-to-date, if you believe that the credit-related information we hold about you is inaccurate, incomplete or out of date please notify us with the details of your correction request. We will provide you with a written response to your credit information access and correction requests within 30 days of our receipt of the request.

9. Complaints and Concerns

If you have a complaint about the handling, use or disclosure of your credit information, please write to our Privacy Officer at the contact address below. We have procedures in place for investigating and dealing with complaints and concerns about our practices in relation to the Privacy Act and the CR Code. These are detailed in our general Privacy Policy. We will respond to your complaint in accordance with the relevant provisions of the Privacy Act or the CR Code. For further information please contact us.

10. Updates to our Privacy Policy

From time to time, it may be necessary for us to review our Privacy Policy. We may amend our Privacy Policy at any time and notify you by providing you with an updated version.

Contact

Privacy Officer
RMBL Investments Limited
Level 5, 225 Lonsdale Street Dandenong Victoria 3175
Phone: (03) 9213 5700
Email: privacy@rmbbl.com.au

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