

CONSUMER DATA RIGHT POLICY

This is the Consumer Data Right (**CDR**) Policy for Middle Technology Australia Pty Ltd ACN 649 575 315 (Australian Credit Licence 536443) (**we, us, our**).

Introduction

The CDR regime was introduced under the *Competition and Consumer Act 2010* (Cth) and the *Competition and Consumer (Consumer Data Right) Rules 2020* (Cth) (together, the **CDR legislation**) by the Australian Federal Government in order to allow consumers to have more control over their data and choice in how their CDR data is shared. Consumers can authorise the holders of CDR data to share their CDR data with organisations or specified people, including people who are accredited by the Australian Competition and Consumer Commission (**ACCC**) as data recipients (**accredited data recipients**), data holders (such as banks) and other third parties.

What is this CDR Policy about?

We are committed to providing you with the highest levels of customer service. Your privacy matters to us and protecting your privacy is of the utmost importance to us. We manage your CDR data in accordance with the CDR legislation.

This CDR Policy describes how we manage your CDR data, how you can access your CDR data, how you can request we correct your CDR data, and how you can ask us questions or lodge a complaint.

This CDR Policy relates only to CDR data (including personal information that is CDR data). If you would like to learn more about how we protect your 'personal information' that is not CDR data, please see our Privacy Policy and Privacy Collection Notice at www.middle.finance.

Our accreditation and outsourced service providers

We are formally accredited as an unrestricted accredited data recipient in our own right. Our accreditation is subject to ongoing processes, including internal dispute resolution, information security standards, audits and other requirements set by the ACCC.

No outsourced service providers will hold CDR data on our behalf and we will have no CDR representatives.

You can manage your consents through our CDR dashboard

We provide a secure CDR dashboard where you can view and revoke any consent you have provided, including any collection consent and disclosure consent. Through the CDR dashboard, you can tell us to stop disclosing your CDR data, or to de-identify or delete your CDR data.

If you withdraw your consent for us to collect or use your CDR data prior to completing the Middle Discovery Journey, we will be unable to provide you with some of the functionality related to our products and services.

What CDR data do we collect and how do we hold it?

The classes of CDR data we collect includes:

- account details such as product category, account type and product name, masked account number, account nickname, account status, account meta data (e.g., credit cards, term deposits, loans);
- balance details, such as current balance, available funds; and
- aggregated insights and analytics on expenses, income and assets.

We will only collect and use your CDR data in accordance with your consent. We restrict the collection to only the data that we need to provide our product and services to you.

We apply a high level of security and privacy protection to all CDR data that we hold, and only store CDR data in Australia. We de-identify CDR data by excluding account holder names from the API ingestion and by masking account numbers before they are stored. This means that it is not possible for anyone to connect your CDR data with you outside of your completed Middle Discovery Journey. We only share your data with your consent.

Why do we collect your CDR data?

We collect, hold, use and disclose your CDR data in accordance with the consent that you have provided to us, so that we can provide our products and services to you.

We will also use your CDR data to undertake general research into how our products and services can be improved so that we can offer you better or more personalised products and services. As outlined above, de-identified data is used to conduct this general research and we remove identifiers from this CDR data so that account names and account numbers cannot be used to link your CDR data to you. When we de-identify data, we will only use it for our general research purposes. We disclose de-identified data to our affiliates.

To whom will we disclose your CDR data?

We will only disclose your CDR data in accordance with the CDR legislation.

This means that we will only disclose your CDR data with your consent and only to certain persons (namely, accredited persons or trusted advisers you nominate such as your mortgage broker, and to any co-applicant, except where otherwise required or authorised by law).

Generally, trusted advisers are not CDR participants and are therefore not subject to the privacy safeguards or other obligations that apply under the CDR system. This means that CDR data disclosed to a trusted adviser is no longer subject to the protections and safeguards of the CDR system unless the trusted adviser is also an accredited person.

How can you access and correct your CDR data?

You have the right to request access to your CDR data that we hold about you and to request its correction at any time. We will respond to your request as soon as possible; however, for your protection, we will need to verify your identity before we give you access to your CDR data.

We will give you access to your CDR data within a reasonable time period in a manner requested by you. There may be exceptional circumstances where we cannot give you access to your CDR data or may refuse to correct your CDR data (for example, in some situations it may be unlawful for us to do so). If this is the case, we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the CDR data we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading. Reasonable steps that we may take include updating your personal information from public sources or asking you to confirm that the personal information we hold is complete, accurate and current.

If any of the personal details you have given us has changed, or if you believe that the CDR data that we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading and needs to be corrected or updated, please contact us at enquiries@middle.finance. We will respond to your request to correct your CDR data within 30 calendar days after the request is made. If we are unable to correct your personal information or otherwise provide you with access within this period, we may need to ask you for more time to do so.

You may request to correct your personal information that we hold about you at any time at no cost. We may refuse to correct the CDR data we hold about you if we do not agree with the corrections you have supplied. If we refuse your request, we will give you a written notice to that effect.

In addition to your personal CDR data, you may also direct us to share certain kinds of information about our products to you or an accredited data recipient. This includes generic information about the products and services that we offer, such as our terms and conditions, eligibility criteria and general product availability.

Do we disclose your CDR data to accredited persons who are based overseas?

Your CDR data will not be disclosed to any entity outside Australia. Your CDR data is encrypted and stored securely in Australia. We have designed our processes to eliminate the need to send your CDR data offshore.

When will we delete or de-identify your CDR data?

You can tell us that you want your CDR data to be deleted or de-identified through our CDR dashboard. If you request to have your CDR data deleted or de-identified, all personally identifiable CDR data will be de-identified in accordance with the law. All personally identifiable CDR data will also be de-identified if you withdraw your consent for us to collect or use your CDR data or when your consent otherwise expires. Your de-identified data may be used for general research and we will retain the data for this purpose.

We will delete your CDR data if you withdraw your consent for us to collect or use your CDR data prior to completing the Middle Discovery Journey.

What will we notify you about?

We are required to keep you informed when certain events occur related to consents you have granted us. We will notify you of the following:

- when you give, amend or withdraw your consent for us to us collecting, using and/or disclosing your CDR data;
- when we collect your CDR data;
- when we disclose your CDR data to an accredited third party;
- that your consent is still current if 90 days have passed since the occurrence of certain events;
- your rights if your consent expires;
- the action we take in response to a request by you to correct your CDR data; and
- you are affected by any eligible data breach under the Notifiable Data Breach Scheme.

Changes to this policy

This CDR Policy is subject to change from time to time as we consider necessary. This CDR Policy was last updated on 2 July 2024. We will publish material changes by making them available on our website.

If you would like a copy of our CDR Policy in another form (such as a paper copy), please contact us.

How can you contact us?

If you have any questions about how we have handled your CDR data, you would like to access or correct your CDR data, or you would like to request that we delete your CDR data that we hold, please email us at enquiries@middle.finance.

How can you lodge a complaint?

If you wish to make a complaint about the way we have handled your CDR data, please email us at complaints@middle.finance.

We will acknowledge receipt of your complaint as promptly as possible. When you make a complaint, you will need to provide us with general identification information so that we can identify and liaise with you, details of the complaint and any supporting documents or evidence you have. When we receive your complaint, we will handle it as a matter of priority and will endeavour to investigate and resolve your complaint within 30 calendar days. If it is a complex matter, it may take us longer than 30 days to resolve your complaint, and so we may need to ask you for more time to resolve your complaint.

If you are unsatisfied with our response, you can lodge a complaint to the Australian Financial Complaints Authority (see www.afca.org.au/about-afca/contact-us). You may also refer your complaint to the Australian Information Commissioner (see www.oaic.gov.au/about-us/contact-us or call 1300 363 992).