



PRIVACY POLICY

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

About this policy

Middle is 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.

This policy describes how your personal information and, where applicable, credit information is collected, used, disclosed and held by Middle in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles contained in the Privacy Act.

What is 'personal information'?

Under the law, personal information has a broad definition; however, in general, it means information from which you can be identified. In Australia, personal information includes 'credit information' and 'sensitive information'. Where Middle handles credit information, it will be bound by Division 3 of Part IIIA of the Privacy Act.

In this policy when we refer to 'personal information', we mean personal information (including 'credit information' and 'sensitive information') under the Privacy Act.

Updates to this policy

This Privacy Policy will be reviewed and updated from time to time. Any personal information about you that we handle will be governed by our most current version of the Privacy Policy. This Privacy Policy was last updated on 14 November 2022. We will publish material changes by making them available on our website. You should check our website regularly and review this Privacy Policy for any changes.

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1. Your consent

By using our website, applying for, or using a product or service, you agree to be bound by this Privacy Policy and that Middle may:

- use your personal information to provide you with our products or services
- use your personal information to verify your identity by disclosing your personal information to third parties to confirm that the personal information you have provided matches that held in third party registers
- collect and use your sensitive information with your explicit consent
- use consumer credit information or commercial credit information about you, or obtain and use a credit report about you from a credit-reporting agency, to assess your suitability for a loan (more information on the use of credit information can be found at [Question 11](#) of this Privacy Policy)
- provide information about you to your mortgage broker
- provide information about you to an organisation that may provide credit to you
- use your personal information for any of the purposes set out in [Question 2](#).

Middle may send you information about products, services and special offers, new products or services on an ongoing basis, including by SMS, social media, email, telephone or mail. You can ask us to not send you direct marketing material and you can ask us to tell you what personal information we hold about you. See the answer to [Question 12](#) of this Privacy Policy for more information.

2. For what purposes do we collect your personal information?

We will only use your personal information for:

- the purpose for which it has been provided
- reasonably related secondary purposes
- any other purpose you have consented to; and
- any other purpose permitted under the Privacy Act.

We will only use your 'sensitive information' for the purpose for which it was originally collected (or for a use directly related to that original purpose).

We may also aggregate the personal information that we collect for reporting and statistical purposes and to help us improve our website. If we disclose any aggregated information to a third party, the information will be de-identified and will not contain any personally identifiable information.

3. What kinds of personal information do we collect about you?

We collect information about you and your interactions with us. The type of information we collect from you includes information necessary for us to provide our products or services to you. We may ask you to provide personal information to us including but not limited to:

- personal and contact details such as your name, phone number, residential or postal address, email address, telephone number and date of birth
- documentary evidence to verify your identity such as your driver's licence, passport and marital status
- financial details such as details of your employment history, income and expenses, assets, financial liabilities and the number and age of any dependents
- information we need to provide services to you such as your bank account details
- digital information from you electronically when you use our website or online services, and
- credit information such as a credit check and repayment history information (see [Question 11](#) of this Privacy Policy for more information).



We apply a high level of security to all personal information that we hold about you. We apply an even higher level of privacy protection to any sensitive information that you provide to us. We will only collect sensitive information about you with your explicit consent.

4. Why do we collect and use your personal information?

We collect personal information about you so that we can:

- provide you with products and services, including by processing your data to derive credit related metrics
- provide you with access to our website
- answer your questions
- identify you
- undertake our fraud prevention procedures
- deal with any complaints or concerns you may have
- comply with any relevant laws, regulations and requirements, including our internal policies, and
- undertake any other relevant activities for which you have provided consent.

The personal information will be used to:

- assess your application for credit
- provide you with information about products and services
- if you are applying for employment with us through our website, to assess, process and manage your application for employment
- handle any complaints that you may have
- notify you about new features and products
- develop new features, products and services
- improve and personalise our website for you, or improve our products or services; and
- conduct research for our own internal purposes

We also collect your personal information so that we can contact you and provide you with information about products and services that may be of interest to you.

5. How do we collect your personal information?

We collect your personal information in many ways. These can include when you:

- contact us by telephone, email or via our website
- create or update a user profile that includes personal information such as your name and contact details
- apply for a product or service, or
- apply for employment with us.

The personal information we collect about you comes primarily from your Discovery Journey or other product forms and through our ongoing communications with you.

We will not collect any personal information about you except in accordance with the Privacy Policy or where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us. Any information collected from publicly available sources will be protected with strict confidence in the same way as the information you voluntarily disclose.

6. Who can we collect personal information about you from?

Where reasonable and practical, we will only collect your personal information directly from you.

However, in addition to what you voluntarily provide to us, we may also collect information about you from other sources such as government and law enforcement agencies and third-party service providers who may help us provide our products and services to you, and to comply with relevant laws and regulations.

We may also obtain a credit report from a credit-reporting body when authorised by you to do so.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us, that the other person has consented to you providing us with the information, and that we can collect, use and disclose that information as set out in this Privacy Policy without having to take any further steps required under law (such as obtaining consent directly from that person). This means that if you provide us with personal information about someone else, you must make sure that the individual concerned understands the matters set out in this Privacy Policy and has provided their consent to be bound by this policy.

7. Do we use cookies on our website to collect information?

When you access our website, we may collect information about you using 'cookies'. Cookies (and other similar technology) are small amounts of information which we may store on your computer to collect, store and receive identifiers and information about your usage of our website as well as information about where you are located at the time you access our website (using GPS, Bluetooth, or Wi-Fi signals, depending on the permissions that you have granted).

Cookies in themselves do not identify the individual user, just the computer used. Allowing us to create a cookie does not give us access to the rest of your computer and we will not use cookies to track your online activity once you leave our site. Cookies are read-only by the server that placed them and are unable to execute any code or virus. You are able to configure your security settings to accept or reject requests to place a cookie on your computer.

By using 'cookies' we are able to enhance and personalise our website to better suit your needs (e.g., make it easier to log in and access information about your account) and for system administration, preparation of statistics on the use of our website and to improve our website's content. This information may also be used for the purposes of targeted advertising based on your online behavioural profile.

8. Can you deal with us anonymously?

In general, you can visit our website without telling us who you are or revealing any personal information about yourself. Our web servers collect the domain names, not the email addresses, of visitors. However, there are parts of our website where we may need to collect personal information from you for a specific purpose, such as to provide you with certain information you request. We do this using online forms, emails, or other communication methods (e.g., over the telephone or by mail).

9. To whom can we disclose your personal information?

We only use and hold your personal information for the purpose of providing you with the products and services you have sought from us or for any other matters that are directly related with that purpose that you would reasonably expect, and other permitted purposes set out in this Privacy Policy such as direct marketing.

The types of external organisations to which we may disclose your personal information (including any credit related metrics derived from your data) and the purposes of that disclosure include:

- your mortgage broker for the purpose of assisting them to assess your suitability for a credit product



- other individuals who intend to apply for a credit product with you as a co-applicant via the Middle Discovery Journey
- third parties (such as third-party service providers) who may help us provide our products and services to you or to fulfil the purposes for why we collect your information
- companies and contractors who we retain to provide services for us, such as providers of fraud prevention services
- other companies associated with Middle; and
- other individuals or companies authorised by you.

You consent to us disclosing your information to such entities (and allowing such entities to use your personal information to provide their services) without obtaining your consent on a case-by-case basis.

Sometimes we are required or authorised by law to disclose your personal information. For example, we may disclose your personal information to a Court, Tribunal, external dispute resolution scheme (e.g., AFCA), regulator (such as ASIC) or law enforcement agency in response to a request or subpoena or to the Australian Taxation Office.

The above entities may in turn disclose your personal information to other entities as described in their respective privacy policies or notices.

10. Will we send your personal information offshore?

No, your data will not go outside Australia. We have designed our processes to eliminate the need to send your personal information offshore.

11. What happens when we obtain credit information about you in our role as an access seeker?

By using the Middle Discovery Journey, you will authorise us as an access seeker to obtain your credit information (including a credit report) from a credit reporting body (such as Equifax, illion or Experian) on your behalf and subsequently share this information with your mortgage broker so that they can assess your suitability for a credit product and to process your application.

The kind of credit information we will handle about you includes:

- identification information
- credit liability information
- repayment history information
- the type of consumer credit or commercial credit, and the amount of credit, sought in the application and an application made by you to a credit provider
- default information
- payment information; and
- the opinion of a credit provider in relation to serious credit infringements by you.

For further information about credit reporting bodies, visit:

- www.equifax.com.au
- www.illion.com.au
- www.experian.com.au

We will use this data to derive credit related metrics about you. We will disclose your credit information, and information we derive from it, to your mortgage broker and also to any co-applicant.



12. Will we use your personal information to market our products and services? (Direct Marketing)

Middle or its related bodies corporate may use your personal information to send you information about new or existing products, services and special offers or about changes to its organisation. By providing us with your personal information, you consent to us using your personal information to contact you on an ongoing basis for this purpose, including by SMS, social media, email, telephone or mail.

If you do not want us to send you marketing information, you can contact us using the details in [Question 18](#) of this Privacy Policy to tell us that you want to 'opt out' of receiving this type of information. There is no charge if you elect to 'opt out' of receiving these types of updates and we will take all reasonable steps to ensure that you stop receiving them as soon as possible.

13. How can you access and correct the personal information that we hold about you?

You have the right to request access to your personal information that we hold about you and to request its correction at any time. We will need to verify your identity before we give you access to your personal information.

We will give you access to your personal information within a reasonable time period in a manner requested by you. There may be exceptional circumstances where we cannot give you access to your personal information or may refuse to correct your personal information, as permitted under the Privacy Act. 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 personal information 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 we may ask you to confirm 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 personal information that we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading and needs to be corrected or updated, please contact us using the details in [Question 18](#) of this Privacy Policy. We will respond to your request to correct your personal information 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 an extension. If we do so, we will provide you with the reasons for this request and give you regular updates. If you do not consent to an extension sought by us, we may be unable to resolve your access or correction request.

There will be no charge for the making of any request. We may refuse to correct your personal information we hold about you if we do not agree with the corrections you have supplied. Should we refuse your request, we will give you a written notice to that effect and an information statement if requested.

14. For how long will we hold your personal information?

We will only keep personal information that we hold about you while we need it or while we are required by law to keep it. Once we no longer need your personal information, we will take all reasonable steps to destroy it or to de-identify it.

We will only hold, use or disclose your personal information in a manner as set out in this Privacy Policy.

15. Is the personal information that we hold about you secure?

We will take all reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We will store your personal information in electronic form or in cloud facilities operated by us (or by third parties on our behalf).

We have implemented policies, procedures and systems to keep your personal information secure. In addition, we limit access to the personal information we hold to your mortgage broker and employees with a legitimate need to use it consistent with the purpose for which the information was collected, for any other matters related to that purpose that you would reasonably expect, and other permitted purposes set out in this policy such as direct marketing. This is done in order to prevent against any unlawful use, unauthorised access, modification or disclosure.

When your personal information is no longer required, we will take reasonable steps to destroy, delete or de-identify your personal information in a secure manner. However, we may sometimes be required by law to retain certain information, for example, under the Archives Act 1983 (Cth).

16. What happens if you click on a link to a third party's website that is contained on our website?

Our website may contain links to third party websites and social media features that are hosted by a third party. A link to another website does not mean that we sponsor, endorse, or approve the information found on that website. We are not responsible for the privacy policies or practices of third-party websites or social media features and your use of those websites and features are governed by the privacy policies and practices of the hosting entities.

17. Can you get a copy of this Privacy Policy in a different format?

If you would prefer to receive a copy of this Privacy Policy in a different form (for example in hard copy or via email), please contact us on the details in [Question 18](#) of this Privacy Policy. We will be pleased to comply with your request.

18. How can you contact us?

If you have any questions about how we have handled your personal information or if you would like to access or correct your personal information, please contact us on:

Email: enquiries@middle.finance

19. How can you lodge a complaint?

If you wish to make a complaint because you believe we have not complied with our obligations under the Privacy Act, or about the way we have handled your personal information, please contact us on:

complaints@middle.finance.

The Privacy Officer will acknowledge receipt of your complaint as promptly as possible. We will endeavour to investigate and resolve your complaint within 30 calendar days. If it is a complex matter, we may need to ask you for an extension and if this is the case, we will provide you with an explanation of why we need the extension, as well as regular updates once the extension has been granted by you. If you do not consent to an extension, we may be unable to resolve your complaint.

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

Please note that you are required to lodge a complaint with us directly at least 30 days prior to contacting AFCA or the OIAC.