Privacy Policy

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1. Introduction

1.1. MSA National Pty Ltd ACN 604 605 156 (**MSA**, **we**, **us**, or **our**) is dedicated to protecting your privacy and handling your personal information with the utmost care and respect. This commitment is integral to our operations, from our Board members to our employees and contractors.

1.2. This Privacy Policy explains how MSA National handles your personal information in accordance with the:

(a) *Privacy Act 1988* (Cth) (**Privacy Act**);

(b) Australian Privacy Principles;

(c) Privacy Regulations 2025 (Cth);

(d) Privacy and Other Legislation Amendment Act 2024 (Cth) (the 2024 Amendment Act); and

(e) other relevant privacy and credit codes,

together and each to be referred to as the **Privacy Laws**.

1.3. We are committed to safeguarding your privacy and ensuring that you understand how your personal information is collected, used, and shared.

1.4. This policy applies whenever you visit our website, use our mobile applications, access our APIs, or us providing you with any of our products and services which includes us dealing with you as a prospective, current or our client (collectively, the **Services**).

1.5. By using our Services, you agree to this Privacy Policy. If you do not agree, please do not use our Services.

1.6. Our website uses cookies to enhance your experience. For cookies that are not strictly necessary, we will ask for your consent when you first visit our website.

1.7. You can manage your privacy preferences through the controls available on our website, including your choice to receive or decline marketing communications.

2. What Personal Information We Collect

2.1. Personal information is any information or opinion that identifies you or can reasonably identify you. The information or opinion is still defined as personal information even if it is untrue or whether there is a record of it.

2.2. We have provided a list below of the personal information that may be provided to us by our clients for their customers that we service or we may collect from you or your representatives:

Personal and Contact Information:	Name, date of birth, address, phone number, email, social media username or membership in any company or trust.
Government Identifiers:	Passport, driver's license, citizenship, birth certificate, Medicare details, or tax identification numbers or any other identity documents.
Document Verification Service (DVS) gateway service provider (DVS Checks)	We may use Government related identifiers and identity documents for verifying your identity and checking with the document issuer or official record holder via IDyou or other Document Verification Service (DVS) gateway service providers and third party systems for the purpose of confirming your identity in accordance with the Identity Verification Services Act 2023 (Cth). Your personal information with respect of DVS Checks will only be used by MSA National for verification of your identity and not for any other purpose. If you do not provide your consent we will need to use alternative methods to verify your identity.
Financial & Personal Circumstances Information:	Occupation, place of work, bank account details, transaction data,

	income, assets, financial liabilities, financial changes and life events, bank account details, credit card details, credit history, credit capacity, ability to be provided with credit or credit worthiness.
Socio-Demographic Information:	Citizenship, age, gender, nationality, relationship status, occupation, dependents and place of work.
Digital Information:	IP address, device details, browsing activity, location data (if enabled), signature, photograph, video or audio recording.
Sensitive Information:	Biometric data (e.g., fingerprint for authentication), and information about life events. Please note other than what is outlined above, we generally do not collect '*sensitive information*' as defined under the Privacy Laws and we further restrict collection of such sensitive information to circumstances where we have either obtained your express consent or a permitted general situation exists.
Other Information:	Any details shared during your interactions with us, including call recordings and publicly available information.

2.3. MSA National's services are directed at adults. We do not knowingly collect personal information from individuals under the age of 18 in the ordinary course of our operations. If you believe a minor's personal information has

been provided to us inadvertently, please contact our Privacy Officer using the details in Section 23.

2A. Collection and Use of Employee Personal Information

2A.1 This section applies to current, prospective, and former employees, contractors, and other workers engaged by MSA National.

2A.2. In the course of the employment relationship, MSA National may collect the following categories of personal information:

Identity and Contact Information:	Name, date of birth, home address, phone number, email address, and emergency contact details.
Government Identifiers:	Tax file number, superannuation fund details, bank account details for payroll purposes, and right to work documentation.
Pre-Employment Information:	Employment history, qualifications, references, and background or police check outcomes collected in accordance with our Screening Policy (MSA-HR02).
Employment Records:	Remuneration and payroll records, leave and attendance records, performance and conduct records, training completion records, and disciplinary records.
Health Information:	Medical or health information where relevant to an employee's work capacity, a workplace injury, or our obligations under applicable workplace health and safety laws. This information is collected only where required by law or with the employee's consent.

2A.3. This information is collected to manage the employment relationship and to meet MSA National's legal and regulatory obligations. This includes administering payroll, superannuation, leave and benefits; conducting pre-employment screening; supporting performance management and training; maintaining records required for audit and compliance purposes; and meeting obligations under applicable employment, tax, and workplace health and safety laws.

2A.4 Employee personal information is stored and managed through MSA National's Human Resource Information System (HRIS), and is classified as Confidential in accordance with our Information Classification and Handling Policy. Access is restricted to authorised personnel on a need-to-know basis.

2A.5. MSA National does not disclose employee personal information to third parties except where required by law, where necessary to administer the employment relationship (such as to payroll providers, superannuation funds, insurers, or background check providers), or with the employee's consent.

2A.6. Employees may request access to, or correction of, the personal information MSA National holds about them by contacting our Privacy Officer using the details in Section 23.

3. What Happens If You Do Not Provide Your Information?

3.1. If you do not provide the personal information we request, we may not be able to offer our Services, verify your identity, or protect you from fraud.

4. Remaining Anonymous or Using a Pseudonym

4.1. You may choose to remain anonymous or use a pseudonym when making general inquiries. However, to provide most of our Services, we need to verify your identity.

5. How We Use Your Personal Information

5.1. We use your personal information for the following purposes:

Providing Services:	To process your loan, mortgage and security documents, service your clients, attending to settlement for the purchase or sale of properties, deliver our Services to you, improve user experiences, marketing and selling our relevant products and

	services and to communicate with you or your representatives.
Business Operations:	To handle transactions, respond to inquiries and complaints, arranging for services to be provided by third parties appointed by us, manage risks, to comply with our contractual obligations, facilitating our internal business operations, such as record keeping, data analytics, reporting, quality assurance, auditing, training and including the fulfilment of any of our legal requirements.
Security and Fraud Prevention:	To prevent and investigate fraud, cyberattacks, and unauthorised access.
Improving Services:	To review feedback, test new features, and develop better products and services.
Compliance with Laws:	To meet our clients or our legal and regulatory responsibilities, such as verifying identity or sharing data with law enforcement.

5.2. We may combine your information with other data to understand trends, improve services, and assess risks more effectively.

6. Electronic Lodgement Network (ELN)

6.1. For property transactions, we use the Electronic Lodgement Network (ELN) such as "PEXA" (Property Exchange Australia). By engaging our services, you agree to the ELN's Privacy Policy. PEXA's Privacy Policy is available at https://www.pexa.com.au/privacy-policy/

7. De-Identified Information

7.1. We may remove identifying details from your personal information for research or analysis purposes. This Privacy Policy and Privacy Laws will

generally not apply to our use of de-identified information. However, we will continue to safeguard this de-identified information.

7.2. If this information is later combined with other data that identifies you, it will be treated as personal information.

8. Collecting or Sharing Your Personal Information

8.1. From time to time, in order for us to perform the functions and/or activities described above we may collect or share personal information about you with third parties or organisations as described below:

Group Companies or our Affiliates:	Subsidiaries our related entities and other organisations with whom we have affiliations (if any) to facilitate our and their internal business processes for operational purposes.
Other Organisations	Other organisations, who jointly with us, provide products or services to you or with whom we partner to provide products or services to you.
Your joint applications, joint account holders and Guarantors	Joint applicants, joint account holders or guarantors.
To your Authorised Representatives	Where we have been notified of your Authorised Representative, we will disclose your details to them (including your legal adviser, mortgage broker, lender, financial adviser, insurer, executor, administrator, guardian, trustee, or attorney).
Service Providers:	Contractors, financial institutions, third party service providers who assist us in operating our business (including but not limited to regional and interstate settlement agents, credit reporting bodies, insurers, re-insurers and technology service providers).
Authorities:	Government agencies, regulatory bodies when required by law, government registries, law

	enforcement bodies in any jurisdiction, credit reporting bodies and public information in public registers.
Third Parties:	Our financial advisers, legal advisers, auditors or organisations involved in a corporate re-organisation or involved in a transfer of all or part of the assets or business of our organisation. Organisations involved in the payments systems including financial institutions, merchants and payment organisations. Organisations required to assist us discharge our legal requirements (e.g. the provision of a tax file number under the Income Tax Assessment Act, the 'know your client' requirements under the Anti- Money Laundering and Counter Terrorism Act and the responsible lending and identification requirements under the National Credit Code and associated Land Title, Personal Property and Property Law legislation). We may use or disclose your information to comply with our legislative or regulatory requirements in any jurisdiction and to prevent fraud, criminal or other activity that may cause you, us or others harm including in relation to our products or services.
Document Verification Service (DVS) gateway service provider	We use IDyou and any other verification of identity service provider to simplify customer on-boarding and to verify your identity. With your consent, your personal information will be checked with the document issuer or official record holder via a Document Verification Service (DVS) gateway service provider and third party systems for the purpose of confirming your identity in accordance with the Identity Verification Services Act 2023 (Cth). Your personal information will only be used by MSA National for verification of identity and not for any other purpose and will only be shared outside of MSA National with a financial

	institution that you are a prospective customer or a customer of or your authorised representatives.
Other Circumstances	Where required or authorised by law or we have a public duty to do so, with your express consent, where your consent may be reasonably inferred from the circumstances, or where it is permitted under the Privacy Laws. We may also use or disclose your personal information for a secondary purpose where the use or disclosure is required or authorised by or under an Australian law or a court/tribunal order, or if a permitted general situation applies.

8.2. We take reasonable steps to ensure these parties comply with Australian privacy laws and maintain the security of your information, including through contractual privacy and security obligations, and periodic risk-based assessments where applicable.

9. Retaining and Deleting Personal Information

9.1. We retain your personal information only for as long as necessary to fulfill its purpose or meet legal requirements. Once no longer needed, we securely destroy or de-identify the data.

10. Security of Personal Information

10.1. Much of the information we hold about you will be stored electronically. We store some of your information in secure data centres that are located in Australia. We also store information in data centres of our contracted service providers (including cloud storage providers), and some of these data centres may be located outside of Australia, subject to the protections described in Section 11. Some information we hold about you will be stored in paper files. We use a range of physical, electronic and other security measures to protect the security, confidentiality and integrity of the personal information we hold both in Australia and overseas.

10.2. We use technical and organisational measures to protect your personal information. This includes:

(a) storing data in secure locations (both physical and digital);

(b) limiting access to authorised individuals and having in place identity and access management controls;

(c) employees and our contracted service providers are bound by internal information security policies and are required to keep information secure;

(d) regular training for employees on privacy and security practices;

(e) we regularly monitor and review our compliance with internal policies and industry best practice.

(f) MSA National holds ISO 27001:2022 certification, independently assessed by an accredited certification body. This certification provides third-party validation of our information security management system, covering access control, encryption, logging and monitoring, incident response, backup and vendor management - all of which apply to the protection of your personal information.

10.3. The security of your personal information is important to us. We take reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures

10.4. Despite our precautions, sending unencrypted data online carries risks. You are responsible for keeping your passwords secure.

10.5. We cannot ensure the security of any information that you transmit to us over the internet and you do so at your own risk. Our website links to external websites and we take no responsibility for the privacy practices or the content of these other sites.

10.6. We will not sell your personal information to other companies or organisations without your prior consent

11. Sharing Information with Overseas Recipients

11.1. MSA National's primary data hosting and processing occurs within Australian data centres operated by Macquarie Telecom (ISO 27001:2022 certified).

11.2. MSA National acts as a service provider to lender clients, handling personal information of borrowers and related parties on their behalf. Any disclosure of personal information to overseas recipients occurs only where: (a) the relevant lender client has authorised the disclosure under its

agreement with MSA National; or (b) a permitted general situation applies under the Privacy Laws; or (c) you have expressly consented to the disclosure.

11.3. Prior to any such disclosure, MSA National takes reasonable steps to ensure that overseas recipients handle personal information in a manner consistent with the Australian Privacy Principles, including through contractual protections and confidentiality obligations.

11.4. Where third-party service providers with offshore personnel or operations are engaged to support MSA National's operations, appropriate contractual protections and risk-based assessments are applied before any personal information is disclosed.

11.5. Where personal information is accessed by overseas personnel in connection with the services described in this Policy, such personnel are typically located in the Philippines. Access occurs via secure remote connection to MSA National's Australian-based servers and personal information is not transferred to or stored in an overseas jurisdiction. MSA National takes reasonable steps to ensure that overseas personnel handle personal information in a manner consistent with the Australian Privacy Principles, including through contractual protections, confidentiality obligations, risk-based assessments, and information security controls supporting MSA National's ISO 27001:2022 certified ISMS.

12. Automated Decision Making

12.1. MSA National does not make decisions based solely on automated processing, including profiling, that would have a significant legal or similarly significant effect on individuals.

12.2. Automated and AI-assisted tools may be used to support internal business processes and operational service delivery. AI supports but does not replace human decision-making. All decisions affecting individual rights are made by qualified MSA National staff.

12.3. MSA National is committed to transparency in its use of automated processes. As part of our ongoing governance programme, we are reviewing our use of substantially automated decision-making and will update this Policy accordingly, ahead of the compliance milestone set by the 2024 Amendment Act on 10 December 2026.

13. AI and Data Privacy

13.1. MSA National uses AI and Large Language Models (**LLMs**), and includes AI and LLMs in its Privacy Impact Assessment process to fully understand the risks and data usage involved in these systems.

13.2. Where AI systems process personal information, MSA National restricts AI use to systems governed by strict agreements, ensuring that any AI data processing involving personal data is not shared with other customers or third parties and is not used to train models outside the Organisation's control, and remains within the control of MSA National at all times.

14. Notifiable Data Breaches

14.1. Under the Notifiable Data Breaches (**NDB**) scheme of the Privacy Act, if a data breach involving your personal information is likely to result in serious harm, MSA National is required to notify you and the Office of the Australian Information Commissioner (**OAIC**) as soon as practicable.

14.2. MSA National maintains a formal incident response process, coordinated by our Governance and IT teams, to assess, contain and respond to data breaches in a timely manner.

14.3. Where a breach is assessed as notifiable, affected individuals are contacted directly with details of the incident and recommended steps to mitigate harm. Exceptions apply where effective remedial action has eliminated the risk of serious harm.

14.4. If you believe your personal information may have been affected by a data breach, please contact us using the details in Section 23.

15. Your Rights

15.1. In this Section 15, we have summarised the rights that you have under the Privacy Laws. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

15.2. The summary of your principal rights under Privacy Laws are:

(a) to request, at any time, for us to inform you of the personal information we hold about you;

(b) the right to access;

(c) the right to rectification;

(d) the right to erasure (where we have no legitimate right or business requirements to retain your personal information);

(e) the right to restrict or object to processing (where we have no legitimate right or business requirements to retain your personal information);

(f) the right to complain to a supervisory authority; and

(g) the right to withdraw your consent (where we have no legitimate right or business requirements to retain your personal information).

15.3. You have the right to confirmation as to whether or not we process your personal information and, where we do, access to the personal information, together with certain additional information. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal information. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

15.4. You have the right to have any inaccurate personal information about you rectified and, taking into account the purposes of the processing, to have any incomplete personal information about you completed. If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

15.5. We may refuse to give you access to the personal information we hold about you if we reasonably believe that giving access would pose a serious threat to the life, health or safety of an individual, or to public health or safety, where giving access would be unlawful, where giving access would have an unreasonable impact on the privacy of other individuals, or if we consider the request to be frivolous or vexatious.

15.6. If we refuse to give you access to or to correct your personal information, we will give you a notice explaining our reasons except where it would be unreasonable to do so.

15.7. In some circumstances you have the right to the erasure of your personal information without undue delay. Those circumstances include:

(a) the personal information that is no longer necessary in relation to the purpose for which it was collected or otherwise processed;

(b) you object to the processing under certain rules of applicable Privacy Laws;

(c) the processing is for direct marketing purposes; and

(d) the personal information has been unlawfully processed.

15.8. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary for us to provide any products or services to you, for compliance with our legal and regulatory obligations, attend to any complaints made by you or for the establishment, exercise or defence of legal claims.

15.9. You have the right to object to our processing of your personal information for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal information for this purpose.

15.10. MSA National will not use for marketing purposes your Government related identifiers and identity documents and any results from checking your personal information with the document issuer or official record holder via a Document Verification Service (DVS) gateway service provider and third party systems for the purpose of confirming your identity in accordance with the Identity Verification Services Act 2023 (Cth).

15.11. Under the 2024 Amendment Act, you may also have the right to bring a direct civil action (a statutory tort) against a party who has seriously invaded your privacy. This includes conduct that intrudes upon your seclusion or misuses your personal information, where that conduct was intentional or reckless and a reasonable person in your position would find it highly offensive. This right is independent of any complaint made through the OAIC and has been in effect from 10 June 2025.

16. Making a Privacy Complaint

16.1. If dissatisfied with how your personal information is handled, you can contact us. We can be reached on the contact details provided in Section 23 of this Privacy Policy.

16.2. Complaints can be addressed to the Complaints Officer via email on the contact details provided in Section 23 of this Privacy Policy.

16.3. Upon receiving a complaint, we will confirm receipt and provide details of the person managing your complaint.

16.4. We will investigate and propose a fair resolution, potentially requesting additional information.

16.5. A final response will typically be provided within 30 days.

16.6. If dissatisfied with our resolution, you can escalate the complaint to the OAIC after allowing us the required 30-day period. The OAIC's contact details are provided for below if you wish to lodge a privacy complaint:

To: Office of the Australian Information Commissioner

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

Mail: GPO Box 5218, Sydney NSW 2001

17. Third-Party Websites

17.1. The website may contain hyperlinks to third-party websites. We are not responsible for the privacy policies or practices of these third parties.

18. About Cookies

18.1. Cookies are files stored by web browsers, enabling servers to recognize browsers during visits.

18.2. Cookies can be either persistent or session-based, with different durations and purposes.

18.3. While cookies do not typically identify users, personal information stored may be linked to cookie data.

19. Cookies We Use

19.1. Cookies are used for various purposes, such as:

(a) authentication and session management;

(b) application state maintenance;

(c) personalisation;

(d) security;

(e) advertising relevance;

(f) performance analysis; and

(g) storing cookie preferences.

20. Cookies Used by Service Providers

20.1. Service providers may use cookies on our website.

20.2. Google Analytics gathers data on website use via cookies to generate reports.

20.3. Google AdSense may track user interests for tailored advertisements, with opt-out options provided.

21. Managing Cookies

21.1. Most browsers allow users to block or delete cookies, with links provided for browser-specific guidance.

21.2. Blocking cookies may negatively impact website usability.

21.3. Certain website features may not work if cookies are blocked.

22. Amendments

22.1. We may update this Privacy Policy periodically by publishing changes on our website.

22.2. Users are advised to review this Privacy Policy regularly for updates. It can be located on our website at www.msanational.com.au.

23. Our Details

23.1. The website is owned and operated by MSA National under New South Wales, Australia laws.

23.2. Contact can be made in writing to PO Box 66, North Ryde BC, NSW 1670, via email to the Privacy Officer at privacy@msanational.com.au or by calling us on 1300 672 007.

23.3. This Privacy Policy is Version 11.1, dated May 2026.

End of Document

24. Document Control

Document Name	Privacy Policy
Status	Approved
Classification	Public
Version	11.2
Document Owner	Megan Borg
Approved By	Ayhan Baba

25. Change History

Date	Version	Changed by	Description of Change
Prior to 2024	1.0 - 8.0	Megan Borg	Change tracking begins with this version; earlier versions were updated annually, but records may be incomplete or overwritten.
November 2024	9.0	Megan Borg	Clauses added relating to Automated Decision Making (13) and how data is used by AI (14).
May 2025	10.0	Megan Borg	Clause added relating to PEXA (7). Language added to ensure that appropriate disclosures are made under the new Document Verification Service (DVS) gateway service provider requirements.
May 2026	11.0	Megan Borg	Annual review completed. Updated to reflect current Australian privacy law, including the Privacy Regulations 2025 (Cth) and Privacy and Other Legislation Amendment Act 2024 (Cth). Key changes include new individual rights disclosures, clearer information on automated decision-making and

			AI, strengthened overseas data handling provisions, and the addition of MSA National's ISO 27001:2022 certification. Minor clarifications throughout.
May 2026	11.1	Megan Borg	Added Section 2A - Collection and Use of Employee Personal Information, to provide transparency regarding MSA National's handling of employee personal information within this Policy.
May 2026	11.2	Megan Borg	Added Clause 11.5 to clarify how personal information is handled when accessed by MSA National's overseas personnel located in the Philippines, including confirmation that data remains hosted in Australia.