

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 2013; and
 - (d) 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. Your Rights

- 2.1. This section outlines your rights under Privacy Laws, including rights to access, rectify, or erase your personal information.
- 2.2. Your rights include:
 - (a) requesting details of personal information we hold about you;

- (b) accessing your personal information;
 - (c) requesting corrections or updates;
 - (d) requesting erasure of your personal information (subject to exceptions);
 - (e) restricting or objecting to processing;
 - (f) complaining to a supervisory authority; and
 - (g) withdrawing consent where applicable.
- 2.3. You can request confirmation of whether your personal information is being processed and obtain access to your data (subject to a reasonable fee for multiple copies).
- 2.4. Inaccuracies in your personal information can be rectified, and you can request completion of incomplete information.
- 2.5. Access may be denied in specific circumstances, such as safety threats, unlawful access, or frivolous requests.
- 2.6. If access or rectification is refused, we will provide reasons unless unreasonable to do so.
- 2.7. You have the right to request erasure of your personal information under certain conditions, but exclusions apply (e.g., compliance with legal obligations or service delivery).
- 2.8. You may object to direct marketing purposes, and upon objection, processing for this purpose will cease.

3. What Personal Information We Collect

- 3.1. 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.
- 3.2. 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:

<i>Personal and Contact Information:</i>	Name, date of birth, address, phone number, email, social media
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	username or membership in any company or trust.
<i>Government Identifiers:</i>	Passport, driver's license, citizenship, birth certificate, Medicare details, or tax identification numbers or any other identity documents.
<i>Document Verification Service (DVS) gateway service provider (DVS Checks)</i>	<p>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).</p> <p>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.</p> <p>If you do not provide your consent we will need to use alternative methods to verify your identity.</p>
<i>Financial & Personal Circumstances Information:</i>	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.

<i>Socio-Demographic Information:</i>	Citizenship, age, gender, nationality, relationship status, occupation, dependents and place of work.
<i>Digital Information:</i>	IP address, device details, browsing activity, location data (if enabled), signature, photograph, video or audio recording.
<i>Sensitive Information:</i>	<p>Biometric data (e.g., fingerprint for authentication), and information about life events.</p> <p>Please note other than what is outlined above, we generally do not collect '<i>sensitive information</i>' 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.</p>
<i>Other Information:</i>	Any details shared during your interactions with us, including call recordings and publicly available information.

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

- 4.1. 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.

5. Remaining Anonymous or Using a Pseudonym

- 5.1. 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.

6. How We Use Your Personal Information

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

<i>Providing Services:</i>	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.
<i>Business Operations:</i>	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.
<i>Security and Fraud Prevention:</i>	To prevent and investigate fraud, cyberattacks, and unauthorised access.
<i>Improving Services:</i>	To review feedback, test new features, and develop better products and services.
<i>Compliance with Laws:</i>	To meet our clients or our legal and regulatory responsibilities, such as verifying identity or sharing data with law enforcement.

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

7. Electronic Lodgement Network (ELN)

- 7.1. 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/>

8. De-Identified Information

- 8.1. 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.
- 8.2. If this information is later combined with other data that identifies you, it will be treated as personal information.

9. Collecting or Sharing Your Personal Information

- 9.1. 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:

<i>Group Companies or our Affiliates:</i>	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.
<i>Other Organisations</i>	Other organisations, who jointly with us, provide products or services to you or with whom we partner to provide products or services to you.
<i>Your joint applications, joint account holders and Guarantors</i>	Joint applicants, joint account holders or guarantors.
<i>To your Authorised Representatives</i>	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).
<i>Service Providers:</i>	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) and these service providers may not comply or be required to comply with our privacy policy that we provide the services with.
<i>Authorities:</i>	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.
<i>Third Parties:</i>	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.
<i>Document Verification Service (DVS) gateway service provider</i>	<p>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).</p> <p>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.</p>
<i>Other Circumstances</i>	<p>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.</p>

- 9.2. We will ensure these parties comply with Australian privacy laws and maintain the security of your information.

10. Retaining and Deleting Personal Information

- 10.1. 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.

11. Security of Personal Information

- 11.1. 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. 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.
- 11.2. 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.
- 11.3. 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
- 11.4. Despite our precautions, sending unencrypted data online carries risks. You are responsible for keeping your passwords secure.
- 11.5. 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.

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

12. Sharing Information with Overseas Recipients

- 12.1. We may share your information with trusted service providers located overseas. Before sharing, we take steps to ensure these providers comply with Australian privacy laws and secure your data.
- 12.2. Prior to disclosing your personal information to an overseas recipient, unless a permitted general situation applies, we will take all reasonable steps to ensure that:
- (a) the overseas recipient does not breach the Privacy Laws;
 - (b) the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way the Privacy Laws protect the information; or
 - (c) you have consented to us making the disclosure.
- 12.3. Acceptance of any of our services in writing, orally or electronic means will be deemed as giving consent to the disclosures detailed herein.

13. Automated Decision Making

- 13.1. MSA National does not engage in automated processing for decision-making purposes. This means that we do not make decisions based solely on automated processing, including profiling, that would significantly impact your legal rights or similarly affect you.
- 13.2. All significant decisions involving your data are reviewed and made by our team to ensure transparency, fairness, and accountability in our processes.

14. AI and Data Privacy

- 14.1. 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.
- 14.2. 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.

15. Notifiable Data Breaches

- 15.1. Under the Notifiable Data Breaches (**NDB**) scheme of the Privacy Act, certain breaches must be reported to you and the Office of the Australian Information Commissioner (**OAIC**), along with recommended steps to mitigate harm.
- 15.2. The NDB scheme applies to breaches likely to result in serious harm, but exceptions exist (e.g., if remedial actions have resolved the risk).
- 15.3. If a data breach impacts your personal information and creates a likely risk of serious harm, we will notify you and the OAIC promptly and provide ongoing updates.
- 15.4. You can contact us if you believe your personal information has been affected by a data breach. We can be reached on the contact details provided in Section 23 of this Privacy Policy.

16. Your Rights

- 16.1. 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.
- 16.2. 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).
- 16.3. 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.

- 16.4. 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.
- 16.5. 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.
- 16.6. 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.
- 16.7. 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.
- 16.8. 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.
- 16.9. 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.

- 16.10. 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).

17. Making a Privacy Complaint

- 17.1. 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.
- 17.2. Complaints can be addressed to the Complaints Officer via email on the contact details provided in Section 23 of this Privacy Policy.
- 17.3. Upon receiving a complaint, we will confirm receipt and provide details of the person managing your complaint.
- 17.4. We will investigate and propose a fair resolution, potentially requesting additional information.
- 17.5. A final response will typically be provided within 30 days.
- 17.6. 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 complain:

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

18. Third-Party Websites

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

19. About Cookies

- 19.1. Cookies are files stored by web browsers, enabling servers to recognize browsers during visits.
- 19.2. Cookies can be either persistent or session-based, with different durations and purposes.
- 19.3. While cookies do not typically identify users, personal information stored may be linked to cookie data.

20. Cookies We Use

- 20.1. 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.

21. Cookies Used by Service Providers

- 21.1. Service providers may use cookies on our website.
- 21.2. Google Analytics gathers data on website use via cookies to generate reports.
- 21.3. Google AdSense may track user interests for tailored advertisements, with opt-out options provided.

22. Managing Cookies

- 22.1. Most browsers allow users to block or delete cookies, with links provided for browser-specific guidance.
- 22.2. Blocking cookies may negatively impact website usability.
- 22.3. Certain website features may not work if cookies are blocked.

23. Amendments

- 23.1. We may update this Privacy Policy periodically by publishing changes on our website.
- 23.2. Users are advised to review this Privacy Policy regularly for updates. It can be located on our website at www.msanational.com.au.

24. Our Details

- 24.1. The website is owned and operated by MSA National under New South Wales, Australia laws.
- 24.2. 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.
- 24.3. This Privacy Policy is Version 10, dated May 2025.

End of Document

25. Document Control

Document Name	Privacy Policy
Status	Approved
Classification	Public
Version	10.0
Document Owner	Megan Borg
Approved By	Ayhan Baba

26. 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	<p>Clause added relating to PEXA (7).</p> <p>Language added to ensure that appropriate disclosures are made under the new Document Verification Service (DVS) gateway service provider requirements.</p>