

AMA Privacy Policy

Our Privacy Policy

This AMA Privacy Policy covers all associated entities of the AMA Group of. It explains how we protect both the privacy of our clients and the privacy of businesses on which we:

- provide information to our clients;
- arrange insurance on behalf of our clients;
- undertake collection action on behalf of our clients;
- assess the credit-worthiness on behalf of our clients;
- contact for any other purpose on behalf of our clients.

Protecting privacy and the confidentiality of personal information is fundamental to the way AMA does business. As a provider of debt recovery solutions with a wide range of complimentary services, AMA has a long history of handling personal information confidentially. We treat very seriously the ongoing trust that is placed in us to protect personal information. We have systems and procedures in place to protect privacy whenever we collect, store, use or disclose personal information.

Anyone can request details about the information AMA holds about them and have the right to ask us to correct this information should any of that information prove to be incorrect or misleading. We encourage our clients to maintain their awareness of the information we hold on them and to contact us as soon as any of that information requires updating.

AMA is bound by the Privacy Act 1988, the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and the 13 Australian Privacy Principles set out in that Act. Privacy law in Australia falls under the auspices of the Australian Information Commissioner and AMA encourages anyone interested in learning more about the application of privacy law to visit the Commissioner's site at:

<http://www.oaic.gov.au/privacy/privacy-act/privacy-law-reform>

What Personal Information Does AMA Collect?

Personal information that AMA collects will fall into two general categories:

1. Information relating to our clients; and
2. Information relating to the customers, or potential customers, of our clients.

Information relating to our clients

When AMA is appointed to recover a commercial debt or enters into an agreement to provide credit management related services to a client, the majority of the information we gather will be provided by our client; such as, on an insurance proposal form, service agreement, during telephone conversations, provided in written communication, during visits to our website or perhaps even when our client visits us in person.

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The type of personal information we collect may include details for the designated contact points within our client such as name, mailing address, telephone number, e-mail address, job title etc. We may also seek similar information regarding the directors of our client where that client is an incorporated entity. There may be occasions, when our client is a sole trader or unincorporated partnership, where we need to source personal information about that client from a third party. For example, we may collect personal information from a credit reporting agency and will require our client's date of birth in order to ensure information is obtained on the correct person.

We only collect personal information about our clients that is necessary for us to perform our functions and activities and to provide our clients with an efficient, personal and, above all, professional service. As an insurance broker and provider of related credit management services we consider ourselves under a professional obligation to ensure that our clients are provided with information relating to products or services that are consistent with effective credit management practices and the minimising of trade credit risk.

There may be instances where we disclose personal information to third parties when we contract out some of our functions and activities. For example, we may provide contact information to a mailing house to send AMA originated information to our clients. In these situations, we prohibit third parties from using our client's personal information except for the specific purpose for which we supply it.

Sensitive information?

We will not collect, use or disclose sensitive information about our clients unless it is necessary to provide that client with a specific product or service and we have our client's consent or unless we are legally required to collect, use or disclose that information.

Sensitive information, as defined by law, is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

We will always explain the purpose for collecting sensitive information. For example, we may use membership of a professional or trade association to provide specific clients with information relevant to the management of trade credit risk within that industry group.

Personal information is usually used or disclosed only after obtaining our client's consent.

Consent

Our client's consent can be express or implied.

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Express consent can be verbal or written. For example, a service agreement may contain a statement that a credit information agency report may be sought. By signing the application, our client is giving their express consent to such a report being obtained from a credit reporting agency.

Our client may imply consent when we can reasonably conclude that our client has given consent by some action they take, or when they decide not to take action. For example, if our client, when making a telephone call to AMA, continues with their call after hearing a recorded message telling them that the call may be monitored or recorded for training or quality assurance purposes, that client has given us their implied consent to monitor or record that call.

It should be understood by our clients that, where AMA is engaged in the specific capacity of trade credit insurance broker, relevant personal information will be disclosed to the insurer with which AMA has placed our client's insurable risk or from which AMA is seeking an offer of insurance on our client's behalf. The provision of such information is subject to the general duties of confidentiality towards our clients as well as to the Australian Privacy Principles.

The circumstances where we may use or disclose personal information without our client's consent are very limited. They include where we are required by law, for the investigation of an offence or for court proceedings.

Disclosure to Third Parties

Subject to any general duties of confidentiality towards our clients and subject to the Privacy Act, AMA may need to disclose our client's personal information to

- credit reporting or debt collecting agencies;
- any service provider it engages to carry out its functions and activities;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- other parties it is authorised or required by law to disclose information to;
- trade credit insurers;
- AMA's professional legal advisors where a relevant legal issue needs to be addressed;
- our client's authorised agent, executor, administrator or legal representative.

Marketing and privacy

Serving customers is fundamental to our business. As part of this service we may use personal information we have collected to identify a product or service that may benefit one or more of our clients. We may contact clients from time to time to let them know about new or existing products or services.

Our clients can contact us at any time if they do not want to receive marketing information from AMA. We will process these instructions as soon as practicable.

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AMA will not provide any third party with specific information regarding any of our clients for the purpose of enabling that third party to market or promote in any way the services of any organisation other than AMA.

Accuracy

We try to keep our clients' personal information up-to-date. If we have accurate information about our client, it enables us to provide that client with the best possible service.

We take reasonable steps to ensure that our client's personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing the information. If one of our clients learns that current personal information we hold about them is inaccurate, incomplete or out-of-date, they should contact us.

We will promptly update any personal information that is inaccurate, incomplete or out of date. Where the information we hold relates to actual or potential customers of AMA's clients we similarly consider ourselves under an obligation to take all reasonable precautions to ensure that information is accurate, complete and up to date at the time of collecting. Whilst that information may not always be regularly updated it will nevertheless remain on AMA's systems as a record of the information that was known at the time it was collected.

Any individual on whom AMA holds such information is encouraged to contact AMA in order to correct any inaccurate or misleading information. AMA will correct demonstrably inaccurate information; however, where AMA does not agree that a correction is appropriate, the individual concerned has the right to request that a statement be attached to their personal information to accompany any use AMA might make of the disputed information.

Information collected on behalf of our clients

Any information AMA collects on individuals on behalf of our clients is for the purposes of assessing risk, protecting trade credit exposure or debt collection; all of which is conducted in relation to commercial transactions. AMA does not collect information for the purposes of, or relating to, consumer transactions.

Any information we collect must be relevant to the purpose for its collection and every reasonable effort will be made to ensure it is accurate and up to date. Any information will only be divulged on a commercial-in-confidence basis for the purposes of commercial credit risk assessment and/or updating our clients on the status of debt collection activity.

When our clients request that we perform a credit risk assessment or compile a credit information report (or any related activity) we will do so on the understanding that, where necessary, our client

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has the appropriate consent from the subject of such assessment or report for such exercises to be conducted.

Any individual who is the subject of an AMA assessment or report is able to:

- obtain a copy of any information we hold on them;
- require us to correct any demonstrable inaccuracies in our information; and
- provide AMA with a statement to accompany any information where its accuracy is a matter of contention.

Contacting AMA

If you wish to access your personal information held by AMA, or complain about possible breaches of privacy, you should direct enquires to:

Privacy Officer

AMA Group of Companies

PO Box 3315 Rundle Mall, Adelaide SA 5000

Phone: 08 8228 4800

Fax: 08 8223 4554

The Privacy Officer will endeavour to deal with your inquiry or complaint as soon as is reasonably practicable.