

Australian National Recoveries Privacy Policy

1. Introduction

As a debt collection agency operating in Australia, ANR is committed to protecting the privacy of our clients and customers. We are bound by the Australian Privacy Principles (APPs) as set out in the Privacy Act 1988 (Cth), and we take our obligations under the Act very seriously. This Privacy Policy sets out how ANR collects, uses, discloses, and protects personal information.

2. Scope and Application

This Privacy Policy applies to all personal information collected, processed, stored, or transmitted by ANR during our operations, including but not limited to our services provided to clients. It governs the actions of our employees, contractors, and third parties who may access or process personal data on our behalf.

3. Compliance with the Privacy Act

ANR is dedicated to upholding the principles and obligations set forth in the Privacy Act 1988 (Cth) and other relevant data protection laws and regulations in Australia.

4. Collection and Use of Personal Information

4.1 Types of Personal Information Collected: ANR may collect personal information as necessary to fulfill our contractual obligations for clients. This information may include, but is not limited to, names, contact details, financial information, and other relevant data.

4.2 Purpose of Collection: Personal information is collected and processed solely for the purpose of performing debt collection activities on behalf of clients. ANR does not use personal information for any other purpose without explicit consent.

4.3 Data Minimization: ANR ensures that personal information is collected and processed only to the extent required for debt collection activities.

5. Use and Disclosure of Personal Information:

ANR uses personal information solely for the purpose of performing our debt collection activities. This may include:

Contacting debtors and creditors to recover debts.

Conducting skip tracing activities to locate debtors.

Conducting credit checks.

Referring debts to legal and other third-party service providers.



ANR may disclose relative personal information to third parties, including debtors, creditors, credit reporting agencies, legal and other third-party service providers, where necessary to perform our debt collection activities and/or when required by regulatory authorities.

6. Privacy Officer

ANR has designated a Privacy Officer responsible for overseeing our privacy compliance and managing data protection inquiries. The Privacy Officer can be contacted at privacy@anrservices.com.au

7. Accountability and Transparency

ANR is committed to transparency regarding our processes data handling practices. We will provide clients with any necessary information or documentation to demonstrate that our process, along with third party providers are compliant with the Privacy Act.

8. Sharing of Personal Information

8.1 Third-Party Service Providers: ANR may engage trusted third-party service providers for specific functions. These providers will have access to personal information only as necessary for the provision of their services and are bound by confidentiality and data protection agreements.

8.2 Legal and Regulatory Requirements: ANR may disclose personal information to comply with legal obligations, respond to regulatory authorities, or protect our rights, privacy, safety, or property.

9. Changes to this Privacy Policy

ANR reserves the right to update this Privacy Policy periodically to reflect changes in our data handling practices, legal requirements, or industry standards. Any changes will be communicated to clients and posted on our website.

10. Measures to Protect Clients and Clients' Customer Information

ANR is dedicated to maintaining the confidentiality and security of all client information, including data pertaining to clients, Clients' customers, employees, and affiliates. We have implemented the following measures to protect client information:

10.1. Access Controls: We employ strict access controls to restrict access to client data, ensuring that only authorized personnel with a legitimate need for such information can access it. Role-based access permissions and strong authentication methods are enforced.



10.2. Confidentiality Agreements: All employees, contractors, and third parties who have access to client information are bound by confidentiality agreements and are required to adhere to strict confidentiality and data protection standards.

10.3. Employee Training: Our employees undergo comprehensive training on data privacy and security best practices. This training includes awareness of the sensitivity of client information and the importance of safeguarding it.

10.4. Encryption: Our third-party provider ensures client data, both in transit and at rest, is encrypted to protect its confidentiality and integrity with industry-standard encryption technologies to ensure that data remains secure during transmission and storage.

10.5. Regular Audits and Monitoring: We conduct regular audits and monitoring of our processes and security measures to identify and address any vulnerabilities or potential threats promptly.

10.6. Data Retention: Our third-party provider retains client information only for as long as necessary to fulfill contractual obligations and legal requirements. Once data is no longer needed, it is securely disposed of or anonymized.

10.7. Incident Response: In the event of a data breach or security incident that may impact client information, ANR has established an incident response plan that includes immediate containment, investigation, and notification to relevant parties, including clients.

10.8. Security Assessments: ANR regularly conducts security assessments, including vulnerability assessments and penetration testing, to identify and mitigate potential risks to client information.

10.9. Compliance with Regulatory Standards: ANR complies with all applicable data protection laws and regulations, including the Privacy Act 1988 (Cth), to ensure that client information is handled and protected in accordance with legal requirements.

10.10. Continuous Improvement: We are committed to ongoing improvement of our processes and security practices. We regularly review and enhance our security protocols to address emerging threats and vulnerabilities.



11. Complaints

If you have a complaint about the way ANR has handled your personal information, please contact us using the details below. We take all complaints seriously and will respond to your complaint as soon as practicable. You can contact us in writing at <u>complaints@anrservices.com.au</u>. If you are disputing a debt in question, you can also contact us in writing at <u>disputes@anrservices.com.au</u> or call us on 1300 793 187.

12. Contact Us

If you have any questions about ANR's Privacy Policy, or if you wish to make a complaint or request access to your personal information, please contact us at: <u>privacy@anrservices.com.au</u> or call us on 1300 793 187 and ask to speak to a manager.

We may update this Privacy Policy from time to time. The latest version will be available on our website at <u>www.anrservices.com.au</u>