



PRIVACY POLICY

Brookmost Pty Ltd acknowledges and respects the privacy of individuals and are committed to protecting it. We are bound by the Privacy Act and the Australian Privacy Principles.

Our Privacy Policy applies to Brookmost Pty Ltd, and its subsidiaries including:

- Brookmost Pty Ltd
- Brookmost Process & Recoveries
- Mercantile Solutions Australia Pty Ltd

Brookmost Pty Ltd provides commercial agency services including collections, investigations, process serving and repossessions to law firms, corporations, collection companies, corporations, government and the public.

This Privacy Policy explains how we handle and protect personal information.

COLLECTION OF PERSONAL INFORMATION

“Personal information” means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information is recorded in material form or not.

Collecting personal information is essential for *Brookmost Pty Ltd* to conduct its business. In all services performed *Brookmost Pty Ltd* acts as an agent for a principal, engaged to undertake specific functions. Generally, the type of personal information that is collected by us comprises name, address, date of birth, gender, occupation, contact details (which may include phone, fax and email), information about your debts, information about your financial circumstances such as your income and employment and certain legal documentation.

Where possible, we collect your personal information directly from you or your authorised representative during our dealings by telephone, email, fax, letter. We collect your personal information from your creditors when we act on their behalf as a collection agent or are engaged by them to manage or recover a debt. We may collect information from credit reporting bodies or other information providers. Additionally, given the circumstances of our work, we are obliged to gather information through interviews with third parties such as witnesses and persons of interest. Your personal information may be provided to us by persons such as clients, family members, friends or colleagues.

If we have difficulty locating or contacting you, we may collect your personal information by making discreet enquiries with third parties. If necessary, we may collect information from your employer to verify your employment status.

If you are being considered for employment with us, we collect information from you during our recruitment process, from recruitment agencies, by contacting your referees, and by undertaking necessary background checks.

SENSITIVE INFORMATION

Sensitive information is information or an opinion about an individual's:

- Racial or ethnic origin
- Political opinions
- 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
- Health

Sensitive information is only collected, used and disclosed by *Brookmost Pty Ltd* where it is allowed by law. Collection of sensitive information is sometimes necessary for our clients to effectively manage and/or defend claims and/or legal proceedings.

In certain circumstances, we may collect sensitive information about you such as health information if that is relevant to your financial circumstances or if the collection is necessary to prevent or lessen a serious threat to the life or health of any individual. We only collect sensitive information with your consent or where we are otherwise permitted to do so.

USE AND DISCLOSURE OF PERSONAL INFORMATION

Brookmost Pty Ltd uses and discloses personal information in relation to commercial agency services to our clients to assist in the management of litigated and non-litigated matters. In compliance with the Australian Privacy Principles any personal information obtained by us is used and disclosed only for this primary purpose of collection. *Brookmost Pty Ltd* will only use or disclose information for a secondary purpose in compliance with the Australian Privacy Principles.

We collect, hold, use and disclose your personal information so that we can undertake our functions and activities efficiently and effectively.

SECURITY

We understand that the security of your personal information is important to you so we take steps to protect your personal information from misuse, interference, loss and from unauthorised access, modification or disclosure. These steps include:

- training all our staff on the appropriate handling of personal information; and
- restricting access to our computer systems, physical records and premises to authorised persons; and
- protecting our technology environment with appropriate security measures such as firewalls and encryption.

We take steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose. If we inadvertently come into possession of personal information that is not relevant to our functions or activities, we will destroy that information.

DATA QUALITY

Brookmost Pty Ltd takes reasonable steps to ensure that the personal information collected, used or disclosed is accurate, complete and up to date. In this respect, we rely on the personal information collected from the individual to be accurate, complete and up to date and expect to be notified by the individual of any changes or inaccuracies in this information.

ACCESS AND CORRECTION

You can request access to your personal information by submitting a completed Personal Information Request Form and a copy of your driver's licence or other form of government identification document to our Resolutions Team. The Personal Information Request Form is available on our website or by contacting our Resolutions Team. We will provide you with a copy of your personal information within a reasonable period after the request is made, usually within 30 days.

In some cases, we may charge a reasonable fee to provide access to your personal information, but we will never charge you a fee to make a request. If a fee will apply, we will advise you before we provide access.

In certain circumstances, we are permitted to withhold or limit access to your personal information. If this happens, we will inform you of the reasons for this where possible.

We reserve the right to deny access to personal information where:

- a) providing access would pose a serious and imminent threat to the health or life of an individual; or
- b) providing access would have an unreasonable impact upon the privacy of another individuals;
- c) the request for access is frivolous or vexatious;
- d) providing access would be contrary to law;
- e) denying access is specifically provided by law;
- f) providing access would breach the duty of confidentiality that Brookmost gives to its client;
- g) providing access would be likely to prejudice civil or criminal proceedings between Brookmost's client and the individual or entity;
- h) providing access would permit the individual to take steps to avoid orders or judgements imposed or likely to be imposed by a Court or Tribunal;
- i) could in any way prejudice law enforcement or security; or

- j) could prejudice the prevention, detection or investigation of seriously improper conduct, either within or external to our operations.
- a) the individual has consented to this information being collected;
- b) the collection is authorised or permitted by law;
- c) the collection is necessary to prevent or lessen a serious threat to the life or health of any individual;
- d) the collection is necessary for the institution or prosecution and maintenance of civil or criminal proceedings; or
- e) the collection is necessary for the establishment and maintenance of a defence to a civil or criminal action.

We will take reasonable steps to ensure that your personal information is accurate, up-to-date, complete, relevant and not misleading. If you believe the personal information we hold about you is not correct, please contact our Resolutions Team. If we are unable to correct your personal information, we will advise you of this in writing and provide the reason.

IDENTIFIERS

Brookmost Pty Ltd employs its own numerical identification system when identifying individuals. It does not adopt any identifier assigned by a government 'agency' such as a tax file number, Medicare number or drivers license number as a means of identifying personal information collected about an individual.

ANONYMITY

Brookmost Pty Ltd gives individuals the option to interact anonymously whenever it is lawful and practicable to do so.

TRANSBORDER DATA FLOWS

Most (if not all) organisations will disclose information to overseas recipients at some point. We take the necessary steps to protect your personal information when it is disclosed overseas. If we have reason to believe that an individual is located overseas, we may disclose their personal information to our overseas agent in that country.

CONTACT

If you have any concerns about how we have managed your personal information, you can:

- speak with the customer service officer managing your matter; or
- request to speak with a manager or our Resolutions Team at anytime

Our contact details are:

Email: enquiries@brookmost.com.au
Phone: 03 9793 3000
Fax: 03 9793 3399
Mail: Resolutions Team, Brookmost Pty Ltd
PO Box 183
Dandenong VIC 3175

From time to time we may review and update our Privacy Policy. We will publish the current version on our website.