

Credit Guide & Privacy Statement

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Broker Group – Choice Aggregation Services	Pennley Pty Ltd ACN 071 979 498 as trustee for the Pennley Unit Trust Credit Representative Number: 392528

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About this document

This document provides you with information relating to our credit activities and the credit assistance we can provide, as well as the importance of responsible lending and our obligations to you. It contains information about various fees and charges that may be payable by you, as well as details about certain commissions we may receive or pay to third parties, and how we and our associates are paid. If you have a complaint or dispute in relation to our services as a credit representative, this document details our internal and external dispute resolution procedures and how you can access them.

The credit services and products detailed in this document are provided by Bernie Lewis Home Loans Pty Ltd (Bernie Lewis, we, us, our), ACN 008 284 544, Australian Credit Licence 388533.

After you have read this document carefully, please retain a copy for your reference.

What is a Credit Representative?

A 'credit representative' is a person who has been authorised by a credit licensee to engage in specified credit activities on behalf of that licensee. At Bernie Lewis Home Loans we refer to that person as a 'mortgage broker', and the particulars of the broker who will be assisting you are noted in the table on the front page of this document.

What is Credit Assistance?

In simple terms under the current regulatory definitions, we are deemed to have provided you with 'credit assistance' when:

- we assist you to apply for a particular loan or lease
- we suggest that you apply for a particular loan or lease
- we suggest you apply for an increase to an existing loan or lease; or
- we suggest that you remain in your current loan or lease

About us

At Bernie Lewis Home Loans, our purpose is to provide ongoing credit assistance to help you achieve home ownership and financial independence. Our services provide access to a wide range of options, and the solutions we recommend may be provided by the major banks, credit unions, or where appropriate, non-conforming lenders.

Our in depth approach to understanding your financial position gives you the confidence that qualified brokers will ensure all your financial requirements work together to create a tailored financial outcome for your situation, resulting in a suitable proposed solution for your home loan needs.

At Bernie Lewis Home Loans we value providing the best possible service and ethical standards to all who seek our assistance, and most importantly we respect the regulatory framework within which we operate to ensure that we act in your best interests at all times.

Our credit services

Bernie Lewis Home Loans offers a full range of consumer lending products across a large panel of lenders for home loans, residential investment loans, equity loans, commercial loans, reverse mortgages, personal loans, leases and asset finance. Our extensive lender panel is regularly reviewed to ensure we provide appropriate choice for our clients, which allows our team of mortgage brokers to provide expert assistance in finding suitable financial products for your personal situation and needs.

At Bernie Lewis Home Loans, we ensure that your mortgage broker is:

- only authorised to provide services to you where they have the appropriate qualifications
- up to date with relevant industry and legislative changes
- provided with excellent technical support, tools and high quality financial product research platforms
- supervised and monitored to ensure they comply with legislative requirements and the high standards set by Bernie Lewis Home Loans; and
- Diploma qualified (Finance and Mortgage Broking Management) and maintains industry relevant MFAA and AFCA membership.

Our credit assessment obligations

As a credit representative we are prohibited from advising on, or facilitating, credit that is deemed to be unsuitable for you. Accordingly, the regulations require Bernie Lewis Home Loans mortgage brokers to:

- make reasonable inquiries to establish your requirements and objectives
- make reasonable inquiries about your financial situation; and
- take reasonable steps to verify the information you provide.

These steps ensure that we are not recommending to you a product that is unsuitable. If the information you provide is incomplete or inaccurate, it may impact on our ability to provide you with appropriate recommendations. For this reason, we must ask you to provide comprehensive information.

If at the time of assessment credit is deemed to be unsuitable, this may be due to a number of reasons. These may include not being able to meet the proposed repayments without substantial financial hardship, or the proposed credit not meeting your requirements and objectives.

The proposed loan arrangements will be based on the information that has been provided by you, which is then means tested through the responsible lending obligations that we must adhere to under the *National Consumer Credit Protection Act 2009* (Cth) ('NCCP' Act), and our further obligations under the *Best Interests Duty*. It is important therefore that the information you provide is complete and accurate. If we proceed on incomplete or incorrect information you may be in breach of your legal obligations to the lender.

Bernie Lewis Home Loans has certain obligations to uphold, in particular not to provide a prospective lender with any information that may be misleading or deceptive. If we believe any information is false, misleading or deceptive, we will not proceed with the proposed loan arrangement and notify the lender as to the circumstances surrounding the situation. It is a legal requirement that we report any instances of fraud, forgery, or any other illegal activities.

By reading this Credit Guide & Privacy Statement you confirm your understanding of the strict obligations that we have to the lender and to uphold the law, therefore criminal proceedings may result from deliberately withholding vital or key information about your circumstances that may affect your current or future financial standing.

If we have provided you with credit assistance you may ask for a copy of our assessment at any time up to 7 years from when we first assisted. If requested, the information provided will be a copy of your Statement of Credit Assistance and loan application.

We are only required to provide you with a copy of the credit assessment if we give you credit assistance. We will provide you with a copy within 7 business days after the day we receive your request, provided you make the request within 2 years after the date of our credit assistance quote; or within 21 business days of the day we receive your request when the date of our credit assistance is greater than 2 years ago.

Cost of services

We provide a comprehensive level of assistance to ensure you have an appropriate and suitable financial solution for your specific situation. Generally, we do not charge fees for our service, however in some cases this service and assistance may attract a fee. Should a fee apply to your circumstances, all details will be set out in the Credit Quote which will be presented to you prior to providing you with credit assistance.

There may also be certain fees which are payable to the lender (e.g. application fees, valuation fees, bank fees, etc.). These will vary depending on the lender and product that has been chosen.

If you repay your loan early this may also trigger additional fees that are payable to the lender. Before you sign your loan contract, make sure you understand what fees are payable on early repayment as in certain circumstances these fees can be quite large. For example, if you take out a fixed rate loan, break cost fees may be payable. For all loan types, loan repayment fees or deferred (postponed) establishment fees may be payable. There may also be other fees such as a discharge fee and legal fees. Please ask your mortgage broker if you require more information on the types of fees that may apply.

Information about our lender panel

We are authorised to engage in credit activities including the provision of credit assistance and acting as an intermediary. Subject to meeting credit criteria, we are able to assist you to obtain loans and leases from a broad range of lenders and lessors through our Lender Panel.

The table below outlines the current panel of lenders from whom we are able to source finance:

*	Adel. & Bendigo Bank	Firefighters Mutual Bank	*	ING Direct	RedZed
	AMP Bank	Firstmac		La Trobe Financial	Resimac
*	ANZ Bank	Go Beyond (Thinktank)		Latitude Financial	Suncorp Bank
*	BankSA	Go Edge		Liberty Financial	Teachers Mutual Bank
	Bankwest	Go Flexi		LMG Asset Finance	Ubank
	Beyond Bank	Health Professionals Bank		Macquarie Bank	UniBank
	Bluestone Mortgages	Heartland Seniors Finance		Members Equity Bank	Virgin Money
	Brighten	Heritage Bank		National Australia Bank	Westpac Bank
*	Commonwealth Bank	HomeStart Finance		Paramount Mortgages	
*	Credit Union SA	Household Capital		Pepper Money	

You will note within the previous table that 6 lenders are marked with an asterisk; these represent the 6 lenders most frequently used by Bernie Lewis Home Loans during the previous full financial year.

Commissions

Bernie Lewis Home Loans is paid commission by the lender for the processing and placement of a loan. This may consist of a trail commission, and/or an upfront commission or a brokerage fee.

Upfront commissions are generally in the range of nil to 0.803% (GST inclusive) of the value of finance utilised, and are paid after the loan/s have settled (i.e. where settlement occurs in December, an upfront commission is generally received in January). Trail commissions can range from nil to 0.55% (GST inclusive) per annum payable monthly in arrears based on the outstanding balance owing throughout the term of the loan.

Additional information about the specific commission arrangements that pertain to the proposed lender (once selected) are available from Bernie Lewis Home Loans upon request.

Volume bonuses, broker benefits and tiered servicing

We and our Broker Group do not receive any volume-based benefit for residential home loan products. However, from time to time we or our Broker Group may receive a benefit, directly by way of cash bonus or additional commissions or indirectly by way of training, professional development days or sponsorship, if we or the Broker Group write a particular volume of loans offered by lenders for products such as commercial and lease products. In line with industry reforms, I am required to record any benefits received from lenders or aggregators to the value of \$100 or more and maintain a register reflecting a rolling 12-month period, stored for 3 years.

We also have access to service programs available from some residential home loan providers. We access these services based on a number of measures. These programs promote preferential services to a customer and do not entitle us to additional payments or commissions or to preferential customer discounts.

Referrals

An up-to-date registry is maintained of all our referrers to ensure that they comply with the terms of the referral process as stated in the NCCP Act, ensuring that they do not act in any way that may be detrimental to our clients.

If you have been referred to us by an individual who has used our services in the past, we may provide a gift as a thank you to that individual. In circumstances where a business to business referral relationship exists with one of our strategic business partners, we may pay a percentage of the commission back to the referrer who introduced the client to us. However, if this is the case, it will be disclosed to you within our compliance documentation.

Complaint resolution

Naturally, we hope that you are very happy with the service and assistance provided by Bernie Lewis Home Loans and your mortgage broker, however if you have any complaints please contact our Chief Operations Officer on (08) 8300 8300, email complaints@bernielewis.com.au or write to us at 'Complaints Department C/- Chief Operations Officer, 68 Greenhill Road, Wayville SA 5034'. We ask that you please explain the situation as clearly as possible.

We will contact you within 24 hours of receiving the complaint to update you, and make every reasonable attempt to resolve the situation as soon as possible. We take complaints very seriously, and we log any complaint information received in an internal register for use in building future training and procedure writing.

You can obtain further information about our internal dispute resolution procedure on request, or access a copy from our website at www.bernielewis.com.au.

Still unsure?

If we have not resolved your complaint to your satisfaction, you may take the matter - free of charge - to the External Dispute Resolution Scheme (provided your complaint is within the scheme's terms of reference). You may refer the matter to the External Dispute Resolution Scheme at any time, but if our internal dispute resolution process is still in progress, they may request that our internal processes be complete before considering the matter further.

Our external dispute resolution service provider is the Australian Financial Complaints Authority (AFCA). Bernie Lewis Home Loans and each of our mortgage brokers are members of AFCA. The Australian Financial Complaints Authority is a dispute resolution scheme which assists customers to resolve complaints with their financial services providers. They provide an independent and impartial dispute resolution service as an alternative to legal proceedings for resolving complaints with members, and their service is available free of charge to the consumer. If we are unable to resolve the complaint to your satisfaction through our internal dispute resolution process, AFCA represents the next escalation point for your concerns. AFCA can be reached via the contact points listed below:

Online: afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Mail: GPO Box 3 Melbourne VIC 3001

AFCA is approved by ASIC.

As your mortgage broker is a separate entity from Bernie Lewis Home Loans, any complaint made to AFCA about your mortgage broker must be made against your mortgage broker. Except to the extent that our internal dispute resolution procedure provides otherwise, you acknowledge that Bernie Lewis Home Loans is not responsible for resolving disputes between you and your mortgage broker, or for the conduct, acts, omissions or wrongdoing of your mortgage broker. You agree that Bernie Lewis Home Loans may plead and rely on the matters set out in this paragraph as a complete defence to any claim you may otherwise have against Bernie Lewis Home Loans arising from the conduct, acts, omissions or wrongdoing of your mortgage broker.

Further information

Bernie Lewis Home Loans does not provide legal or financial advice unless specified in a separate contract. It is therefore important that you understand your legal obligations under the loan, and the financial consequences of taking out the loan. If you have any doubts, you should obtain independent legal and financial advice before you enter into the loan contract.

Before you accept your loan offer, please ensure that you have carefully read the credit contract/loan agreement. Within that agreement you will find full details of the loan and can therefore assess whether the terms of the loan vary from what you require. If any of the details do not meet your needs, please inform us immediately so that we can assist you.

Bernie Lewis Home Loans does not receive any benefit, financial or otherwise, or have any other interest or relationship which could reasonably be expected to influence our recommendation other than that which has been disclosed in this document, nor does Bernie Lewis Home Loans make any warranties about the value of any property you finance with us, or its future prospects. You should always rely on your own enquiries in this regard.

Questions

If you have any questions about any of the services that Bernie Lewis Home Loans provides, please do not hesitate to contact your mortgage broker directly, or Bernie Lewis Home Loans Head Office on (08) 8300 8300.

Privacy Policy

At Bernie Lewis Home Loans we recognise that your privacy is important to you. It's important to us too. When you trust us with your personal information, you expect us to protect it and keep it safe.

We are bound by the *Privacy Act 1988* (Cth) ('Privacy Act') and will protect your personal information in accordance with the 13 Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

About this policy

This privacy policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

What is personal information?

Personal information includes any information or opinion about an identified individual, or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, or provide us with inaccurate or incomplete information, we may not be able to deliver all of those services effectively.

What kinds of personal information do we collect and hold?

When you apply for our products or services we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your Tax File Number if we are authorised to collect it and if you choose to supply it.

We may use your credit information and any other information you provide to arrange finance on your behalf. This may include details of your current financial circumstances (personal and/or business) including your assets, liabilities, income and expenditure.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This may include transaction information or making a record of any queries or complaints you have made.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It may also include health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect voice biometric information to verify your identity or authorise transactions.

For what purposes do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to provide you with products and services. This includes:

- checking whether you are eligible for the product or service
- assisting you where online applications are required to be completed
- providing the product or service, and
- helping manage the product or service.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, or prevent fraud, crime, or other activity that may cause harm in relation to our products or services, and to help us run our business. We may also use your information to tell you about products or services that we think may interest you.

How do we collect personal information?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product or service, or talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or if you send us electronic correspondence (see 'Do we collect personal information electronically?').

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- publicly available sources of information, such as public registers
- your representatives (including your legal adviser, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney)
- your employer
- other organisations, who jointly with us, provide products or services to you
- commercial information service providers, such as companies that provide fraud prevention reports, and
- insurers, re-insurers and health care providers.

Your authorisation may be required to collect information from other people and organisations. You have a right to refuse to authorise us.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- your Tax File Number, if you choose to provide it, by the *Income Tax Assessment Act 1936* (Cth)
- certain information in relation to your application if you have applied for financial products as required by the *Corporations Act 2001* (Cth) or *National Consumer Credit Protection Act 2009* (Cth).

How do we hold personal information?

Much of the information we hold about you will be stored electronically in secure data centres which are owned by either Bernie Lewis Home Loans or external service providers. Also, some information we hold about you may be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and two factor access management
- employees are bound by internal information security policies and are required to keep information secure
- all employees are required to complete training about information security, and
- we regularly monitor and review our compliance with internal policies and industry best practice.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be securely destroyed.

Who do we disclose your personal information to, and why?

Your personal information may be shared with anyone operating under the Bernie Lewis brand for the purpose of providing the services detailed in the 'What kinds of personal information do we collect and hold' section.

We may provide personal information about our clients to organisations outside Bernie Lewis Home Loans.

To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts obligate them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers)
- insurers, re-insurers and health care providers
- payment systems operators (for example, merchants receiving card payments)
- other organisations who, jointly with us, provide products or services to you
- Credit reporting bodies, including for credit guarantee purposes
- financial services organisations, including banks and credit unions
- debt collectors
- our legal advisers or auditors
- your representatives (including your legal adviser, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney)
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct
- IT service providers
- external dispute resolution schemes
- any person considering acquiring an interest in our business or assets, and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside Bernie Lewis Home Loans where:

- we are required or authorised by law, or where we have a public duty to do so
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances, or
- we are otherwise permitted to disclose the information under the Privacy Act.

Do we disclose personal information overseas?

We may disclose your personal information to a recipient who is located outside Australia, such as when storing information with a cloud-based service provider, for our audit functions located in India, or with any overseas financial institution where you have given us permission to make enquiries on your account.

Do we use or disclose personal information for marketing?

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through the Bernie Lewis Home Loans website.

We may also disclose your personal information to companies outside Bernie Lewis Home Loans who assist us to market our products and services to you.

If you don't want to receive marketing offers from us, please contact us. We will endeavour to meet your request within 14 days. We maintain a register for those not wanting to receive direct marketing material.

Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

Each time you visit our website, we collect information about your use of the website, which may include the following:

- the date and time of visits
- which pages are viewed
- how users navigate through the site and interact with pages (including fields completed in forms, and applications completed)
- location information about users
- information about the device used to visit our website, and
- IP addresses.

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more tailored experience.

One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Bernie Lewis Home Loans site.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Access to and correction of personal information

You can request access to the personal information we hold about you. You can also contact us to ask for corrections to be made.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you. We will disclose these charges to you prior to providing you with the information.

In some circumstances we are not required to provide you with access to your personal information.

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.

If we refuse your request to correct your personal information, you have the right to request that a note is recorded with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will facilitate any complaint you wish to make about our refusal.

Notifiable Data Breach Scheme

If the personal information that we hold about any individual is compromised by a breach that we consider is 'serious', we will assess that breach as soon as we become aware of it and will comply fully with our obligations under Privacy Legislation.

Resolving your privacy concerns and complaints – your rights

If you are concerned about how your personal information is being handled, or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within 14 business days, however some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

Our Privacy Officer can also be contacted in relation to privacy concerns by writing to the Privacy Officer, Bernie Lewis Home Loans, 68 Greenhill Road, Wayville SA 5034. Under the Privacy Act, you may complain about our handling of your personal information to the Office of the Australian Information Commissioner (OAIC).

Changes to the Privacy Policy

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up to date version is available online at www.bernielewis.com.au or by calling (08) 8300 8300.

Contact us

You can contact us by:

- calling (08) 8300 8300
- emailing info@bernielewis.com.au
- visiting bernielewis.com.au, or
- writing to us at Bernie Lewis Home Loans, 68 Greenhill Road, Wayville SA 5034

Meaning of words

We, us or our means:

Bernie Lewis Home Loans Pty Ltd (ACN 008 284 544, Australian Credit Licence 388533) and its related bodies corporate.

The Bernie Lewis Home Loans trademark is owned and used by Bernie Lewis Home Loans Pty Ltd ACN 008 284 544, Australian Credit Licence 388533.