



Credit Guide and Privacy Statement

ABOUT US (“we, us, our”):

Licensee	Invictus Finance Solutions Pty Ltd (“licensee”) Australian Credit Licence Number: 392962 Address: 2 Doncaster Road BALWYN NORTH, Vic, 3104 Tel: 03 9486 7888 Fax: 03 9486 7222 Email: admin@invictusfinance.com.au www.invictusfinance.com.au
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We are a licensed provider of credit assistance under the National Consumer Credit Protection Act 2009 and this document provides you with information relating to our activities. It contains information about various fees and charges that may be payable by you to us, as well as about certain commissions we may receive or we pay to certain third parties. It also contains information about what you should do if you have a complaint or dispute in connection with our services.

WHAT IS CREDIT ASSISTANCE?

We give you credit assistance when:

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

OUR ASSISTANCE PROCESS

We are required by law to ensure that any credit product with which we assist you can be deemed “not unsuitable” for you. In simple terms, this means that the product fits your needs and that you can afford to meet the financial repayments.

To establish this, we need to:

- make enquiries with you as to your needs;
- make enquiries with you as to your financial position; and
- collect evidence from you to verify your financial position.

Once we have done this, we will then use our broking expertise to find a product in the marketplace that you can afford and that meets your needs.

We can provide you with a report – called a Game Plan – on how we determined that any loan we assisted you with was not unsuitable for you. You may request this report up to seven years after we provided you with this assistance.

INFORMATION ABOUT THE LICENSEE AND ITS CREDIT REPRESENTATIVES

We are authorised to engage in credit activities including providing credit assistance and acting as an intermediary.

Subject to meeting credit criteria, we are able to assist you to obtain loans and leases for you from a broad range of lenders and lessors.

The following are the Top 6 residential lenders and % of business written in the previous financial year:

- Macquarie Bank 29%
- Bank of Melbourne 17%
- ANZ 16%
- AMP 9%
- NAB 6%
- PLANLend 6%

A list of all the lenders with which we have accreditation:

AMP	ANZ	Auswide Bank
Bank First	Bank of Melbourne	Bank of Queensland
Bank of Sydney	BankWest	Beyond Bank
Bluestone	Brighten	Citibank
Commonwealth Bank of Australia	FirstMac	Heritage
ING	LaTrobe Financial	Liberty Financial
Macquarie Bank	ME Bank	Mystate
NAB	Orde	People's Choice Credit Union
Pepper Money	PLANCustom	PLANExcel
PLANlend	Resimac	Suncorp
Ubank	Victorian Mortgage Group	Virgin Money
Westpac		

AGGREGATION

We obtain mortgage aggregation services from the Broker Group. The Broker Group provides services at arm's-length to our business which include IT systems, loan information and lodgement systems, training and development, commission processing, conferences and professional development events, and assistance with regulatory and compliance obligations. In consideration of the services the Broker Group gives us, we pay fees to the Broker Group or the Broker Group retains some of the commission panel lenders pay on loans we arrange. We have access to Broker Group panel of lenders including Broker Group branded products.

FEES AND CHARGES

FEES PAYABLE FOR THE PROVISION OF CREDIT ASSISTANCE

We may charge a fee for providing credit assistance or associated with providing credit assistance. More detail about those fees will be set out in a quote we will give to you before we provide you with credit assistance.

OTHER FEES AND CHARGES

You may have to pay other fees and charges (such as an application fees, valuation fees and other fees) to the lender, lessor or other parties. You should review the disclosure documents and your loan contract or lease for further details of any such fees and charges.

COMMISSIONS

COMMISSIONS WE RECEIVE

We are paid a commission from the lender. The lender may pay a percentage amount upon settlement of your loan and may also pay an ongoing percentage amount for the life of your loan.

These amounts are paid by the lender and ARE NOT payable by you. If you are interested and want an estimate of what the commission payment will be and how it is worked out, please review your Game Plan document or ask us and we will be only too glad to provide you with this information.

Commonly we use the services of a finance aggregator in order to gain access to many different Australian lenders. In return for this service, our aggregator charges us a share of the commission paid to us by lenders. If you are interested and want an estimate of what the aggregator's commission share will be and how it is worked out, please just ask us and we will be only too glad to provide you with this information.

COMMISSIONS PAYABLE BY US

In some cases, your business may have been referred to us by non-regulated third parties such as real estate agents, accountants, financial planners etc. Where this is the case, we may pay a referral fee to these parties. If we do pay a fee to these parties, then 1) they should already have told you about this; and 2) we will either disclose the actual fee in our final documentation with you or we will instruct you that, if you want to know, you can ask us about the fees and we will tell you how much was paid and how it was worked out.

DISPUTES OR COMPLAINTS

WHAT TO DO IF YOU HAVE A DISPUTE OR COMPLAINT?

We are committed to providing our customers with the best possible service. If at any time we have not met our obligations – or you have a complaint about any of our services – please inform us so we can work towards a resolution. We will endeavour to deal with your complaint promptly, thoroughly and fairly.

You can contact us by whichever of the following means best suits you:

Elie Ayoub
2 Doncaster Road
Balwyn North
03 9486 7888
elieayoub@invictusfinance.com.au

If you choose to contact us by mail or email, please make sure you provide as much detail as possible about your complaint.

We will try to deal with your complaint on the spot. However, if this is not possible, we will write to you to acknowledge your complaint within 5 days. We will ensure we treat you fairly and will work to resolve your complaint as soon as possible. In the rare event we are still investigating your complaint after 30 days we will write to you to explain why and to let you know when we expect to have completed our investigation.

When we have completed our investigation, we will write to let you know the outcome and the reasons for our decision.

STILL NOT SATISFIED?

If you do not think we have resolved your complaint to your satisfaction, you may take the matter – free of charge – to the relevant External Disputes Resolution Scheme (provided it is within the scheme's terms of reference) as detailed below. You may also refer the matter to the relevant External Disputes Resolution Scheme at any time, but if our internal 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), which can be contacted via:

- Online: www.afca.org.au
- Email: info@afca.org.au
- Phone: 1800 931 678
- Mail: GPO Box 3 Melbourne VIC 3001

PRIVACY STATEMENT

COLLECTION & USE OF YOUR INFORMATION

We need to collect personal information about you to provide you with our broking & related services. This privacy statement tells you how we collect your information, what we use the information for and who we share the information with. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

How information is collected from you

We will collect your information from you directly whenever we can, like from enquiries we make of you when you seek credit assistance from us. We may verify that information from sources referred to in the responses to those enquiries or in this privacy statement.

How information is collected from other sources

Sometimes we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it's reasonably necessary to do so, for example, where:

- we collect information from third parties about a loan or lease in relation to which you seek our services;
- we can't get hold of you and we rely on public information (for example, from public registers or social media) or made available by third parties to update your contact details; or
- we exchange information with your legal or financial advisers or other representatives.

When the law authorises or requires collection of information

Some law may require us to collect personal information about you. For example, we may require your information to verify your identity under Australian Anti-Money Laundering law.

How your information may be used

We may use your information for purposes including:

- giving you credit assistance;
- giving you information about loan products or related services including help, guidance and advice;
- considering whether you are eligible for a loan or lease or any related service you requested including identifying or verifying you or your authority to act on behalf of a customer;
- assisting you to prepare an application for a lease or a loan;
- administering services we provide, for example, to answer requests or deal with complaints;
- administering payments we receive, or any payments we make, relating to your loan or lease;
- telling you about other products or services we make available and that may be of interest to you, unless you tell us not to;
- identifying opportunities to improve our service to you and improving our service to you;
- telling you about other suppliers, with whom we have arrangements, that supply goods or services that may be of interest to you;
- allowing us to run our business efficiently and perform general administrative tasks;
- preventing or investigating any fraud or crime or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- any purpose to which you have consented.

You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will process your request as soon as practicable.

What happens if you don't provide information?

If you don't provide your information to us, it may not be possible to:

- assist in finding a loan or lease relevant to your circumstances;
- verify your identity or protect against fraud; or
- let you know about products or services that might be suitable for your financial needs.

Sharing Your Information

General

We may use and share your information with other organisations for any purpose described above.

Sharing with your representatives and referees

We may share your information with:

- your representative or any person acting on your behalf (for example, lawyers, settlement agents, accountants or real estate agents); and
- your referees, like your employer, to confirm details about you.

Sharing with third parties

We may share your information with third parties in relation to services we provide to you or goods or services in which we reasonably consider you may be interested. Those third parties may include:

- the Broker Group through whom we submit loan or lease applications to lenders or lessors on the Broker Group's panel. You can access the Broker Group's privacy notice at www.planaustralia.com.au/privacy-policy. It sets out how that Broker Group manages your personal information and where you can find its privacy policy;
- referrers that referred your business to us;
- financial services suppliers with whom we have arrangements;
- valuers;
- lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries;
- organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;
- government or regulatory bodies as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- guarantors and prospective guarantors of your loan or lease;
- service providers, agents, contractors and advisers that assist us to conduct our business for purposes including, without limitation, storing or analysing information;
- any organisation that wishes to take an interest in our business or assets; and
- any third party to which you consent to us sharing your information.

Sharing outside of Australia

We may use overseas organisations to help conduct our business. As a result, we may need to share some of your information (including credit information) with such organisations outside Australia. The countries in which those organisations are located are:

- N/A

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Privacy Policy

You can find out more about how we manage your information by reading our Privacy Policy available by contacting us. Please see our contact details above. [Also, you can read and obtain a copy of that policy at our website address set out above]. Our Privacy Policy sets out how you can ask us to access and seek to correct information we hold about you and how you may complain against us about a privacy issue.

Information about other people

If you give information to us about another person (like your co-applicant) in relation to the services we provide, you will let that other person know that:

- we have collected their information to provide those services or for any other purpose set out in this privacy notice;
 - we may exchange this information with other organisations set out in this privacy notice;
 - we handle their personal information in the way set out in our Privacy Policy and this privacy notice and they can:
 - access or request a copy of that privacy policy or this privacy notice; or
 - access the information we hold about that other person,by using our contact details above; and
- we may not be able to provide those services to you unless we obtain their information.