

## CREDIT GUIDE

### ABOUT US

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Mintwell Capital Pty Ltd is licensed under the National Consumer Credit Protection Act 2009. The details of our licence are as follows:

Australian Credit Licence Holder	Mintwell Capital Pty Ltd		
Address	Level 1, 530 Little Collins St, Melbourne VIC 3000		
Licence Holder Email	info@mintwell.com.au	Phone Number	03 8595 6775
Australian Business Number	13 616 609 548	Australian Credit Licence Number	502181

This Credit Guide contains important information about us, the services we provide and the activities of the credit representative operating under our credit licence. It also contains:

- information about fees and charges that may be payable by you to us;
- commissions that we may receive when we are acting as a credit representative;
- commissions that we may pay to third parties for introduction of business; and
- information about what you should do if you have a complaint or dispute in connection with our services and activities.

We are required to provide this document to you as soon as practicable after it becomes apparent that we are likely to provide credit assistance to you. We provide “credit assistance” when we:

1. Suggest or assist you in applying for:
  - a. a particular loan with a particular lender;
  - b. an increase to an existing loan with a particular lender; or
2. Recommend that you remain in an existing loan contract.

### PRELIMINARY ASSESSMENT

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Prior to providing credit assistance to you, we must assess whether the particular loan is “unsuitable”. A loan will be “unsuitable” based on the information you provided to us if:

1. You will be unable to repay the proposed loan or will only be able to repay the proposed loan with substantial hardship, or
2. The proposed loan does not meet your requirements and objectives.

We are required to document our findings that the proposed loan is not unsuitable by way of completing a Preliminary Assessment. The Preliminary Assessment will set out your:

- requirements and objectives;
- financial and relevant personal situation; and
- ability to repay the proposed loan.

We are also required to take reasonable steps to verify information provided by you to us. This verification may include:

- requesting you for copies of documents that demonstrate your financial situation - in some cases we may also need to sight original documents; and
- contacting third parties to assist in verifying the information that you provide.

## GETTING A COPY OF OUR ASSESSMENT

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If we provide you with credit assistance, you can ask us for a copy of our assessment any time up to 7 years after we provide you with credit assistance. To request a copy please contact us, we will provide it to you within the following timeframes:

**When you make the request:**

Within 2 years of the date of assistance  
After 2 years of the date of assistance

**When we will provide our assessment to you:**

Within 7 days  
Within 21 days

We do not charge for requesting or receiving a copy of the Preliminary Assessment.

## OUR AGGREGATOR

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We have approval to utilise credit providers and their loan products through the services of our aggregator, Connective Broker Services Pty Ltd ABN 77 161 731 111, Credit Representative 437202, authorised under Australian Credit Licence 389328 ("Connective"). Connective charges us a fee depending on our contract arrangements, consisting of:

- a membership fee for our business; and
- a monthly fee for each of our accredited loan writers.

Macquarie Bank Limited has a minority, non-controlling interest in Connective. Commissions paid by Connective's lender panel are transparent and do not influence the broker or consumer choice. Connective is committed to quality consumer outcomes in all circumstances.

## OUR LENDER PANEL

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We are authorised to engage in credit activities and therefore provide assistance to obtain loans for you from a panel of credit providers. The following are the credit providers through which we generally conduct the most business:

Bank of Melbourne Commonwealth Bank of Australia Homeloans Ltd ING ANZ ME Bank

## FEES PAYABLE FOR THE PROVISION OF CREDIT ASSISTANCE

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We may charge a fee for providing credit assistance to you. If applicable, details about those fees payable by you will be set out in a Credit Quote which we will give you prior to submitting your loan application.

## OTHER FEES AND CHARGES

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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 WE RECEIVE

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Our aggregator receives commission from the lenders and then pays us commission in relation to loan contracts (such as home and investment property loans) for providing credit assistance.

An upfront commission is payable by lenders in relation to settled (drawn-down) loans and is calculated as a percentage of the loan amount. It is usually paid after settlement of the loan.

Trail commission is payable by lenders in relation to settled (drawn-down) loans. It is calculated monthly on the

outstanding loan balance and is paid in arrears.

The upfront and trail commissions that we are paid by lenders are not payable by you. Details of commission to be received will be included in the Credit Proposal Disclosure document that we will provide you with when credit assistance is provided.

From time to time, we may receive a non-commission benefit by way of training, professional development, entertainment, gift, conference attendance, sponsorship, or entry into a competition run by a lender or our aggregator, at no extra cost to you. The nature of such arrangements is temporary, and the occurrence and amounts are often not readily ascertainable, however if they are apparent as a result of providing you with credit assistance, this will be disclosed to you.

## COMMISSIONS PAYABLE BY US

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If a third party has introduced you to us or referred you to us, we may pay them a commission or a fee. We obtain referrals from a range of sources, including real estate agents, accountants, financial planners or other people.

Details of any commission or fees being paid to the referrer will be included in the Credit Proposal Disclosure document.

## OTHER THINGS YOU SHOULD KNOW

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We don't provide legal, financial planning or taxation advice. It is important that you understand your legal obligations under the loan, and the financial consequences. If you have any doubts, you should obtain independent legal and financial planning advice before you enter any loan contract.

## DISPUTES AND COMPLAINTS

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We are committed to providing you with the best possible service, however we understand there may be times where you are not satisfied. If this occurs please inform us verbally or in writing with the exact details of your complaint, so we can work towards a prompt and fair resolution.

If we are unable to reach a satisfactory resolution, you can make a formal complaint. With regards to complaints resolution, we are mindful of the need to ensure that consumers are treated fairly and with respect during the complaints handling process. Any dissatisfaction will be handled in an efficient, timely and effective manner in accordance with ASIC regulations of Internal Dispute Resolution (IDR).

We can be contacted via:

- Telephone: 03 8595 6775 (Monday to Friday 9am - 5pm AEST);
- Fax: 03 8678 3200;
- Post: Level 1, 530 Little Collins St, Melbourne VIC 3000;
- Email: [info@mintwell.com.au](mailto:info@mintwell.com.au)

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Please note that AFCA will request the matter be first attempted to be resolved through our IDR process. If our IDR process is still in progress, they would expect that this process be completed before any external consideration.

AFCA can be contacted via:

- Website: [www.afca.org.au](http://www.afca.org.au)
- Email: [info@afca.org.au](mailto:info@afca.org.au)
- Telephone: 1800 931 678 (free call)
- In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

## PRIVACY POLICY

We are committed to protecting your privacy and the privacy of your clients in accordance with the Privacy Act 1988 (Cth) and the Privacy Amendment Act 2012 (Cth). This Privacy Policy describes our current policies and practices in relation to the handling and use of personal information.

### WHAT INFORMATION WE COLLECT AND HOW WE USE IT

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We will collect personal information when we do business with you. This may include a broad range of information from your name, address and contact details to other information about your qualifications, employment history and financial information. If you choose not to supply any of the information we request, our ability to assist you may be limited.

We will use your personal information:

- to conduct our business; and
- to manage our business relationships with you and with others, including our Credit Providers; and
- to complete a transaction on your behalf; and
- to provide you with information about our products and services.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications. You can unsubscribe by notifying us and we will no longer send information to you.

We may occasionally notify you about promotions, new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post. If you would rather not receive this information, email or write to us. We may also use your information internally to help us improve our services and help resolve any problems.

### WHAT IF YOU DON'T PROVIDE SOME INFORMATION TO US

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If you don't provide us with full information, we can't properly advise or assist you with your credit needs.

### HOW WE STORE AND PROTECT YOUR INFORMATION

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We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you electronically via our secure cloud platform as well as our aggregator's secure platform. We ensure that your information is safe by ensuring all systems remain compliant to Australian Standards and access is only granted to authorised employees, agents or contractors of Mintwell Capital and the companies as described below.

In the extremely unlikely event that we suspect that there has been a data breach that may cause you serious harm, we will take all reasonable steps to assess if your data has been accessed or lost, and if this information being accessed or lost may cause you serious harm. This assessment will always be completed expeditiously and within 30 days.

If we find that there has been a data breach that has the potential to cause you serious harm, this will be reported to the Office of the Information Commissioner and you directly.

## **DISCLOSURE TO THIRD PARTIES**

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We do not sell, trade, or rent your personal information to others.

We may need to provide your information to our aggregator to enable the submission of loans, and to contractors who supply services to us e.g. to handle mailings on our behalf or compliance monitoring activities, or to other companies in the event of a corporate sale, merger, re-organisation, dissolution or similar event. However, we will do our best to ensure that they protect your information in the same way that we do.

We may also provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits.

Some of the recipients to whom we disclose your personal information may be based overseas. It is not practicable to list every country in which such recipients are located but it is likely that such countries will include the United States of America, India and The Philippines.

## **ACCESS AND ALTERATIONS TO YOUR INFORMATION**

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Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate.

If you wish to access or correct your personal information, please write to:

Privacy Officer  
Mintwell Capital Pty Ltd  
Level 1  
530 Little Collins St  
Melbourne VIC 3000

We do not charge for receiving a request for access to personal information or for complying with a correction request. We do not charge for providing access to personal information.

## **YOUR CONSENT**

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By asking us to provide you with our services, including by providing your details through our website, you consent to the collection, use and disclosures to overseas recipients of the personal information you have provided to us for the purposes described above.

Our website may at times contain links to other websites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

## **FEEDBACK**

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Should you be unsatisfied in the manner in which we have handled your personal information please contact us (per details listed above). We will take all necessary steps to investigate and address your concerns. If the issue you have raised is not resolved to your satisfaction you should contact the Office of the Australian Information Commissioner at:

Telephone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Post: GPO Box 5218, Sydney NSW 2001

You can learn more about the Privacy Act and your rights at [www.privacy.gov.au](http://www.privacy.gov.au)