

Customer-Facing Privacy & Credit Information Policy | Published October 2026

Trading Name:	McCombe Mortgages and Finance
Legal Entity:	Extreme Mortgages and Finance Pty Ltd ATF Extreme Mortgages and Finance Unit Trust
Australian Credit Licence (ACL):	ACL 386571 ABN: 28 710 229 405
Director & Privacy Officer:	Matthew McCombe
Professional Membership:	MFAA (Mortgage & Finance Association of Australia)

1. Our Commitment to Your Privacy

Extreme Mortgages and Finance Pty Ltd as trustee for Extreme Mortgages and Finance Unit Trust trading as McCombe Mortgages and Finance (referred to in this policy as 'McCombe Mortgages and Finance', 'we', 'us', or 'our') is committed to safeguarding your privacy and upholding the highest standards of data governance. We operate in strict compliance with the Privacy Act 1988 (Cth), the 13 Australian Privacy Principles (APPs), Part IIIA of the Privacy Act, the Privacy (Credit Reporting) Code 2014, and the professional ethical standards set by the Mortgage & Finance Association of Australia (MFAA).

This customer-facing policy explains how we collect, hold, use, disclose, and secure your personal and credit-related information across our website and mortgage broking operations.

2. Personal, Financial & Credit Information We Collect

To provide credit assistance, assess your borrowing capacity, and fulfill our statutory Best Interests Duty (BID) under the National Consumer Credit Protection Act 2009 (NCCP Act), we collect necessary personal, financial, and credit-related details:

- **Identification Details:** Full legal name, contact numbers, residential and postal address, email, date of birth, marital status, and government-issued identity documents (passport, driver's licence).
- **Financial Information:** Employment history, payslips, tax assessments, financial statements, assets, liabilities, regular living expenses, bank statements, superannuation balances, and details of existing mortgages or credit facilities.
- **Credit Reporting Data (Part IIIA):** Credit application history, loan amounts, repayment history information (RHI), financial hardship arrangements (FHI), default records, and credit reports obtained from credit reporting bodies.
- **Website Analytics & Cookies:** IP address, browser type, operating system, pages visited, and general browsing telemetry gathered via cookies when interacting with our website.
- **Sensitive Information:** Information regarding health or insurance is collected strictly where necessary to arrange relevant products (such as loan protection) and solely with your prior express consent.

3. How We Collect Your Information

- **Directly From You:** Through website contact or enquiry forms, online questionnaires, face-to-face meetings, phone consultations, client portals, and email correspondence.
- **Authorised Third Parties:** With your prior written consent, from third parties including credit reporting bodies (Equifax, Experian, illion), your accountant, conveyancer, real estate agents, current employers, banks, and existing credit providers.
- **Unsolicited Data:** If you submit an enquiry without engaging our services, or send unsolicited documents, we assess whether that information could have been lawfully collected. If not required, we promptly delete or permanently de-identify it.

4. How We Use & Who We Share Your Information With

We use your personal and credit information strictly to evaluate loan eligibility, arrange credit assistance, submit finance applications, manage ongoing client relationships, and fulfill statutory compliance obligations. We will never sell, rent, or trade your personal information. In providing credit services, we may exchange information with:

- **Lenders:** Bank, non-bank, and specialist lenders on our aggregator lending panel.

- **Aggregator:** Connective Broker Services Pty Ltd (our mortgage aggregator) and its secure CRM and compliance platforms.
- **Credit Reporting Bodies:** Equifax, Experian, or illion to obtain credit reports and evaluate creditworthiness with your consent.
- **Professional Advisers:** Your nominated accountant, solicitor, conveyancer, real estate agent, financial planner, or guarantor (subject to written consent).
- **Operational Support Vendors:** Secure cloud IT hosting providers, document management tools, electronic signature platforms, and identity verification services.
- **Regulators & Authorities:** ASIC, AUSTRAC, AFCA, or law enforcement bodies where required or authorised by Australian law.

5. Cross-Border Disclosures & Cloud Data Architecture

All mortgage broking, client assessments, and credit writing are conducted 100% onshore in Australia by Matthew McCombe. We do not outsource loan processing or credit administration to offshore labour teams.

However, in the ordinary operation of modern business software, our secure cloud IT systems (such as Microsoft 365, Google Workspace, and our aggregator portal) may utilise enterprise data centres and servers situated overseas (such as in the United States or Singapore). Where cloud data is hosted internationally, we ensure vendors uphold enterprise encryption, stringent security accreditations (ISO 27001 / SOC 2), and privacy protections equivalent to the Australian Privacy Principles.

6. Direct Marketing & Communication Choices

From time to time, McCombe Mortgages and Finance may contact you with educational updates, interest rate changes, regulatory insights, or finance products that may benefit you.

- **Strict Prohibition on Sensitive Data:** We will never use sensitive information or credit reporting data for marketing purposes.
- **Simple Opt-Out:** You may opt out of receiving direct marketing at any time, free of charge, by clicking the 'unsubscribe' link in any digital communication or by emailing matt@mccombemortgages.com.au.
- **Prompt Processing:** Upon receiving your opt-out request, we will promptly update our CRM and suppress future marketing correspondence.

7. Data Security & Responsible AI Governance

We implement comprehensive physical, technical, and operational safeguards to protect your personal and credit information from theft, misuse, unauthorised access, alteration, or disclosure:

- **Cybersecurity Safeguards:** Multi-Factor Authentication (MFA), enterprise password management, end-to-end data encryption in transit and at rest, and secure portal document transmission.
- **Responsible AI Controls:** In accordance with our strict AI Acceptable Use Policy, personal, identifiable, or confidential client records are never input into public, consumer, or unvetted AI tools. Any operational AI tools utilised are business-tenant protected and prompts are synthesised and de-identified.
- **Statutory Document Retention:** Loan files and compliance records are retained for a statutory minimum of seven (7) years following the conclusion of credit assistance, after which they are securely purged or permanently de-identified.

8. Mandatory Notifiable Data Breaches (NDB) Scheme

We are bound by Part IIIC of the Privacy Act. In the event of a suspected or actual data security incident:

- **Immediate Containment:** We will take immediate remedial action to contain the incident and mitigate potential risks.
- **Prompt Assessment:** We will conduct an expeditious assessment within 30 calendar days to evaluate whether the incident constitutes an Eligible Data Breach likely to result in serious harm.

- **Direct Notification:** If an Eligible Data Breach is identified, we will immediately notify the Office of the Australian Information Commissioner (OAIC) and provide direct, actionable notification to affected clients detailing the breach and recommended mitigation steps.

9. Accessing and Correcting Your Information

You have the right under APP 12 and Section 21T of the Privacy Act to request access to the personal and credit-related information we hold about you. You may also request corrections under APP 13 and Section 21V if any details are inaccurate, out-of-date, incomplete, irrelevant, or misleading.

Access is generally provided free of charge; however, an administrative fee may be charged if extensive archival retrieval is required. We will verify your identity before disclosing information and respond within thirty (30) days. If access or correction is refused under permitted statutory grounds, we will provide a written statement of reasons and outline your avenues for dispute.

10. Feedback, Complaints and Dispute Resolution

If you have any feedback or wish to lodge a complaint regarding our handling of your personal or credit information, please contact Matthew McCombe directly. We maintain a formal Internal Dispute Resolution (IDR) process and will acknowledge your concern within 1 business day and resolve it within 30 days.

Contact Officer:	Matthew McCombe (Director & Privacy Officer)
Office Address:	2/103 Flora Terrace, North Beach WA 6020
Direct Email:	matt@mccombemortgages.com.au
Website:	www.mccombemortgages.com.au
Licence Credentials:	Australian Credit Licence (ACL) 386571 ABN: 28 710 229 405

External Dispute Resolution Options

If you are not satisfied with our response, or if your privacy or credit complaint is not resolved within 30 calendar days, you may escalate your concern to an independent dispute resolution body:

- **Credit & Financial Disputes:** Australian Financial Complaints Authority (AFCA): Free, independent dispute service for Australian credit consumers. Online: www.afca.org.au | Phone: 1800 931 678 | Email: info@afca.org.au | Postal: GPO Box 3, Melbourne VIC 3001.
- **Privacy Matters:** Office of the Australian Information Commissioner (OAIC): Australia's independent privacy and data protection regulator. Online: www.oaic.gov.au | Phone: 1300 363 992 | Email: enquiries@oaic.gov.au | Postal: GPO Box 5218, Sydney NSW 2001.