



Credit Guide

ABOUT US ("we")

Licensee	Jemm Investment Pty Ltd ("Licensee") as trustee for Jemm Trust trading as Lighthouse Finance Group Australian Credit Licence Number: 387066 Address: Suite 17, 303 Pacific Highway Lindfield NSW 2070 Tel: 02 9222 9991
Broker Group	Finance & Systems Technology Pty Ltd ("Broker Group") ACN 092 660 912 Credit Representative Number: 392527

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 pay to certain third parties. It also contains our privacy statement and 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.

THE ASSESSMENT WE NEED TO DO BEFORE GIVING YOU CREDIT ASSISTANCE

Before we provide credit assistance to you, we assess whether the particular loan or lease is suitable for you. To do this, we need to make reasonable inquiries and verify that:

- the loan or lease or increase will meet your requirements and objectives; and
- you can meet the proposed repayments.

We won't be able to give you credit assistance if our assessment shows that:

- you won't be able to meet the proposed repayments without substantial hardship; or
- the loan or lease won't meet your requirements or objectives.

GETTING A COPY OF OUR ASSESSMENT

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 a credit assistance quote. To request a copy please contact us. 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 of the date of our credit assistance quote; or
- otherwise, within 21 business days after the day we receive your request.

INFORMATION ABOUT THE LICENSEE

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 through our Broker Group. Our Broker Group does not require us to recommend any particular lender and our Broker Group does not set any quotas or obligations on us relating to recommending any particular lender.

The Broker Group's panel of lenders includes a number of lenders and loan distributors that are part of the National Australia Bank Group.

Lender Name	Lender Name	Lender Name
Adelaide Bank	Citibank	Macquarie Bank
AMP Banking	Commonwealth Bank	ME Bank
ANZ Bank	First Mac	Mortgage Mart
Australian Financial	Heritage Bank	My State
Australian First Mortgage	Homeloans Limited	National Australia Bank
Auswide Bank	Homestart Finance	Teachers Mutual Bank
Bank First	ING Bank	Pepper Money
Bank of Melbourne	Keystart	St George Bank
Bank SA	La Trobe	Suncorp
BankWest	Liberty Financial	Virgin Money
Better Choice	Loan Avenue	Westpac Banking Corporation
Beyond Bank		Heartland Seniors Finance
Bluestone		Mortgage Ezy

The lenders we are able to assist you with are those listed in **bold** above. In the 2018/19 financial year, we assisted people to enter into loans with 12 of the above lenders.

The following are the lenders or lessors (in no particular order) with whom we generally conduct the most business, but does not represent our full lender panel:

- Commonwealth Bank
- ANZ Bank
- National Australia Bank
- Westpac Banking Corporation
- ING Bank
- St George Bank
- Citibank
- Macquarie Bank
- Suncorp
- BankWest
- AMP Banking

The above is for the period 1/5/2019 – 30/11/2019.

OWNERSHIP

We obtain mortgage aggregation services from the Broker Group. The Broker Group is a member of the National Australia Bank 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.

Our business is owned and managed independently from the Broker Group and National Australia Bank Limited (NAB).

FEES AND CHARGES

FEES PAYABLE FOR THE PROVISION OF CREDIT ASSISTANCE

We may charge a fee for providing credit assistance, depending on the type of credit assistance required. 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 fee, 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

The Licensee has appointed our Broker Group as its agent to receive commissions from lenders and lessors and to pay us commission in relation to loan contracts or leases for which we provide credit assistance. The total amount of commission we may receive in relation to your loan or lease may vary depending on the lender or lessor, the term, the features, the amount of the loan or lease you ultimately choose and the amount and timing of the repayments that you make.

Loan Contracts such as Home Loans, Investment Property Loans and Personal Loans

Upfront commission payable by lenders in relation to loans is calculated as a percentage of the loan amount and is generally in the range of 0% and 0.77% of the loan amount. It is usually paid after settlement of the loan.

Trail commission payable by lenders in relation to loans is generally calculated regularly (monthly, quarterly, bi-monthly or annually) on the outstanding loan balance and is paid in arrears. The trail commission payable by lenders is generally in the range of 0% per annum and 0.275% per annum of the outstanding loan amount.

Leases

Upfront commission payable by lessors in relation to leases is calculated as a percentage of the lease amount and is generally in the range of 0% and 3.3% of the lease amount. It is usually paid after settlement of the lease.

Trail commission is generally not payable in relation to leases.

Further details of the commission earned by us will be included in the credit proposal disclosure document we will provide to you at the same time as we provide you with credit assistance.

You can request information from us about the fees that we are likely to receive, how those fees are calculated, and our reasonable estimate of the fees or commissions that will be payable.

VOLUME BONUS ARRANGEMENTS

Our Broker Group has volume bonus arrangements in place with the Commonwealth Bank of Australia, Westpac Banking Corporation and the Australia and New Zealand Bank Group Limited. 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 our broker group write a particular volume of loans offered by those lenders.

COMMISSIONS PAYABLE BY US

We are not likely to pay a commission to any third party for the introduction of credit business or business financed by the loan contract or lease.

INFORMATION ON GIFTS AND HOSPITALITY RECEIVED

In line with industry reforms, we are required to keep a register of benefits received from any lenders or aggregators to the value of \$100 or more which is kept current (over a rolling 12 month period and retained for 3 years). In the interest of transparency and good customer outcomes, an applicant may request a copy of this register to ensure there is no lender conflicts.

TIERED SERVICING

We 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 customers and do not entitle us to additional payments or commissions or to preferential customer discounts.

PRIVACY DISCLOSURE STATEMENT

Lighthouse Finance Group is collecting personal information about you. This notice is to inform you of your rights under the Privacy Act.

- The information you provide will be held by Lighthouse Finance Group.
- You can gain access to the information we hold about you by contacting us at Suite 17, 303 Pacific Lindfield NSW 2070 and/or 02 9222 9991.

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 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;
- considering whether you are eligible for a loan or lease or any related service you requested;
- 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;
- identifying you;
- telling you about other products or services we make available and that may be of interest to you, unless you tell us not to;
- 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 mortgage aggregator through whom we submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel. You can view our mortgage aggregator's privacy notice at <http://www.fastgroup.com.au/borrower-privacy-statement>

It sets out how our mortgage aggregator manages your personal information and where you can find its privacy policy;

- if we are not an Australian Credit Licence holder, the Australian Credit Licence holder that authorises us to engage in credit activities. Our credit guide will tell you who that Australian Credit Licence holder is. If it is BLSSA Pty Ltd (BLSSA), you can view BLSSA's privacy notice at the same

internet address as our mortgage aggregator's privacy notice. It sets out how BLSSA 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 your information with such organisations outside Australia. The countries in which those organisations are located are: India

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.

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.

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.

If you have a complaint, we request you follow these steps:

1. If your complaint is about your loan, in the first instance please contact your lender or credit assistance provider.
2. If your complaint has not been resolved to your satisfaction within 5 business days or if your loan is about the services we give you, please contact the Licensee as listed in the table above.

If you have a complaint, we request you please contact Megan Mouradian via:

- Telephone: 02 9222 9991
- Email: megan@lighthousefinance.com.au
- Mail: PO Box 680, Lindfield NSW 2070

THIRD PARTY PRODUCTS OR SERVICES

If your complaint relates to a product or service acquired through a third party (for example, a lender) we may ask you to contract the relevant third party. They will deal with your complaint under their complaints resolution process.

If you are not satisfied with the resolution of your complaint by the third party under their complaints resolution process, you are entitled to have your dispute considered by their External Dispute Resolution Scheme. Please contact the third party for further details.

KEEPING YOU INFORMED

Our complaints area will acknowledge receipt of your complaint within five business days. If unable to resolve the complaint/dispute to your satisfaction within five business days, they will write to you advising the procedures we will follow in investigating and handling your complaint.

Within 45 calendar days from the date you lodged the complaint with us, we will write to you advising you the outcome of the investigation and the reason/s for our decision, or if required, we will inform you if more time is needed to complete the investigation.

STILL NOT SATISFIED?

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.

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)¹

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.