# Credit Guide

Key information about who we are, how we're paid, and how we manage your information.

Clarity

*Clarity Home Loans - Australian Credit Licence 387423*

Last updated: March 2026

# Clarity Home Loans

**Australian Credit Licence:**
387423
(Clarity Financial Group Pty Ltd)

**ACN:**
143 878 451

**Address:**
Suite 1, Level 4, 33 Allara Street
Canberra City, ACT 2601

**Phone**:
02 6209 1990

## Our Brokers

- Aisosa (Freddie) Ihegie
- Arman Yazarloo
- Asad Jaffer
- Cesar Martinez
- Guy Curtis
- Jared Parsons
- Lachlan Warren
- Lachlan Macourt
- Matthew Rastar
- Mark Edlund
- Rob Garth
- Shanice Briones
- Shannon O’Neill

**Unlike most other brokers, Clarity brokers don’t earn commissions.**

**Instead, our brokers are paid a fixed salary and bonuses that are not connected to the lender or loan product they recommend.**

**More information about our remuneration can be found in the ‘Fees, charges and commissions’ section.**

# Our Lenders

Through our membership with Australian Finance Group, we have access to a wide range of lenders, including:

- AFG Home Loans
- Adelaide Bank
- AMP
- ANZ
- Australian Military Bank
- Auswide
- Bank of Queensland
- Bankwest
- Bank Australia
- Beyond Bank
- Commonwealth Bank
- Firefighters Mutual
- Great Southern Bank
- Health Professionals Bank
- HSBC
- ING Direct
- La Trobe Financial
- Liberty Financial
- ME Bank
- Macquarie
- My State
- NAB
- Newcastle Permanent
- People's Choice
- Pepper
- P&N Bank
- Resimac
- St George
- Suncorp
- Teachers Mutual Bank
- UBank
- Unibank
- Westpac

**These are the 6 lenders we currently conduct the most business with:**

- St George
- ANZ
- ING
- Commonwealth Bank
- Macquarie
- Bank Australia

We have access to **tiered servicing arrangements** with several lenders, providing faster processing times and greater levels of assistance for obtaining loan approvals.

Your broker will advise you of any tiered arrangements in place with a particular lender at the time that recommendations are made.

Access to these arrangements is not based solely on lending volume and does not entitle your broker to any additional bonuses outside of what they have disclosed to you, or preferential customer discounts.

Lenders currently providing a tiered servicing arrangement to Clarity Home Loans are:

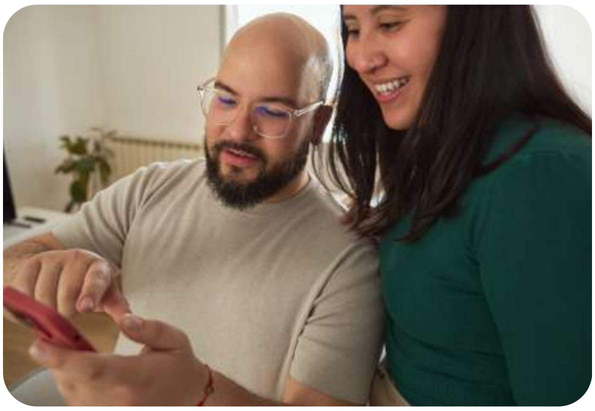
- ING
- St George
- Westpac
- National Australia Bank
- Commonwealth Bank
- Bankwest

# Loan Suitability

**Before we can apply for a credit contract (loan) on your behalf, we are required to conduct a Preliminary Credit Assessment to determine a loan's suitability.**

The law requires us to:

- make reasonable enquiries about your requirements and objectives
- make reasonable enquiries about your financial situation
- take reasonable steps to verify that financial information



Even if you already have a particular lender or product in mind, we have a legal responsibility to ensure you are informed about similar product options in order to determine that the loan is not unsuitable.

This will ensure that all aspects of your particular financial circumstances are assessed appropriately and that any options suggested will not place you in financial hardship.

The Preliminary Credit Assessment collects the key financial information based on your requirements and objectives, and outlines the loan costs associated with entering into the chosen loan credit contract.

Once completed, the Credit Assessment is only valid for 90 days. A copy of the Assessment will be made available to you free of charge, on request.

It is important that you fully understand your legal obligations under the loan, and the financial consequences of entering into the loan agreement.

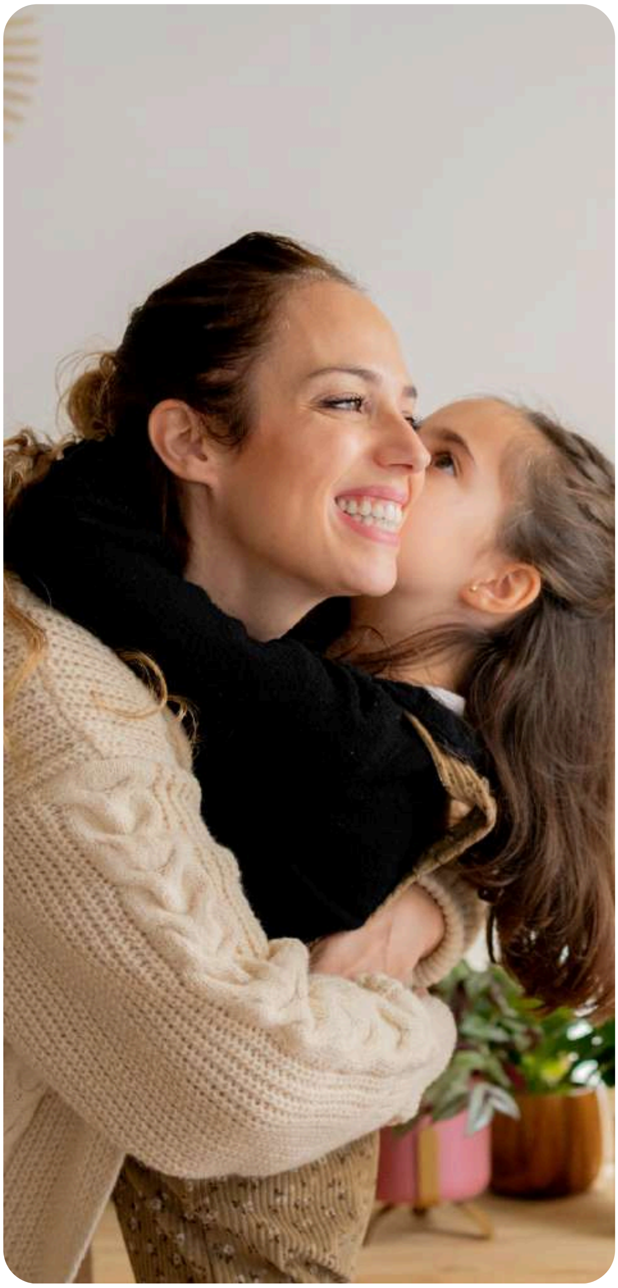
Whilst we stand by the quality of our advice, please note that we do not provide legal or financial advice unless specified in a separate contract.

If you have any doubts, you should obtain independent legal and financial advice.

# Fees, charges and commissions

**Fees payable by you**

If a fee is payable by you to Clarity for our service, this will be disclosed in a Credit Quote that will be provided to you with this document. If a Credit Quote is not supplied, this indicates we will not charge you any fees.



When a loan is submitted, you may need to pay the lender's application fee, valuation fees or other fees that are associated with the application process, even if the loan is ultimately unsuccessful.

We source referrals from a broad range of sources. For example, we may pay fees to existing satisfied clients, real estate agents, accountants or lawyers for referring you to us. There are no fees payable by you.

A summary of lender and referral fees will be detailed in the Credit Proposal provided to you after a product has been assessed as being appropriate for your requirements.

AFG owns AFG Home Loans and AFG Securities. If you choose one of their "white label" home loan products and your loan goes ahead, AFG may earn some extra income from that loan. This is on top of the usual fees they receive for providing services to mortgage brokers.

If this applies to your loan, the exact details will be outlined in the documents you receive for your AFG Home Loan.

# Fees, charges and commissions

## How are we paid?

**All Mortgage Brokers at Clarity receive a salary and may also be eligible for a bonus that is completely independent of the lender or loan product they recommend.**

Bonuses are determined based on a range of factors, including customer service performance and compliance metrics.

## Other disclosures, benefits, or interests

Your broker is prohibited from accepting gifts or inducements over $350. Any benefit given to your broker greater than $100 and less than $350 will be recorded in a Gifts Register. A copy of your broker's register is available to inspect upon request.

Our Mortgage Brokers may hold shares in Australian Finance Group or the lenders that they recommend to you.

We are bound by law to recommend the lender and loan that is best suited to your needs, regardless of these potential shareholdings.

However, if you feel that there is a conflict in the recommendation that has been made and wish to deal with another Mortgage Broker, please contact us.

Lenders pay varying **commissions** to Clarity for the services associated with originating the loan and for the ongoing service we provide to our clients. If your Mortgage Broker does qualify for a bonus, it will, in part, be funded by the commission outlined below that Clarity is paid by the lender.

The range of commissions is:

- Upfront Commission: 0.42% to 0.80% (including GST) of the loan amount (the principal sum advanced on settlement).
- Trail Commission: 0.16% to 0.33% (including GST) per annum of the loan balance (the amount outstanding each month payable throughout the term of the loan).

Commissions are based on a percentage of the loan balance that is drawn down, which in most cases will be net of any amounts you hold in the offset account. The way commissions are calculated and paid to us by lenders may vary.

By following the responsible lending requirements, we will ensure the loan recommended to you is not unsuitable for your situation and objectives.

# Fees, charges and commissions

Some lenders apply a **clawback**, which means they take back (or "claw back") some or all commission if the loan is closed, refinanced, or significantly reduced soon after settlement.

Clawback policies vary, but the standard across most lenders is:

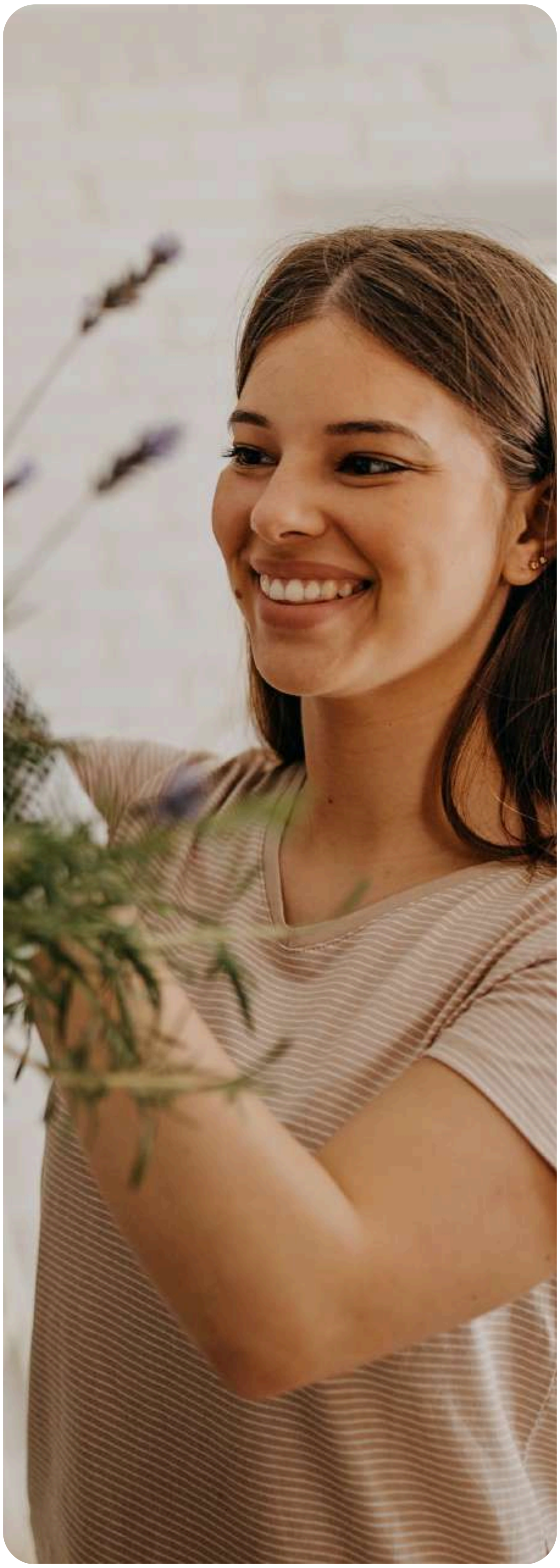
- 100% clawback in the first 12 months
- Up to 50% clawback between 12 and 24 months

In simple terms, if you refinance or close the loan early, the lender may recover part or all of the commission that was paid to Clarity. That means we are effectively unpaid for the work we have already completed on your behalf.

This will never affect the advice we give you. If refinancing early is genuinely in your best interests, we will recommend it without hesitation.

We simply ask that you keep this in mind before making any short-term changes to your loan, especially if your circumstances shift unexpectedly.

If you're unsure whether a change may trigger a clawback, please reach out to us first, and we can talk you through your options.



# Complaints

As a locally owned small business, our reputation is extremely important to us. We go to great lengths to ensure clients are satisfied with our service. However, there may be instances from time to time, where clients may be dissatisfied with the outcomes of our service.

If you have a complaint about the service we provide, the following steps for resolution are available.

Most complaints arise from miscommunication and can usually be fixed quickly. **So please contact your Broker first and tell them about your concerns.**

We pride ourselves on our client service standard, and want to ensure that all concerns and complaints are fully documented, investigated, and resolved promptly.

So, if the issue is not satisfactorily resolved within 1 working day by talking to your broker, the complaint can be internally escalated to our Complaints Officer. You may contact the Complaints Officer directly at:

**Name:** Mark Edlund
**Phone:** (02) 6209 1990
**Email:** admin@clarityfinancial.com.au

**If you are not completely satisfied after these steps have been attempted, you have the right to take your complaint to our external dispute resolution scheme listed below.**

This external dispute resolution process is available to you at no cost.

**Name:** Australian Financial Complaints Authority
**Phone:** 1800 931 678
**Address:** GPO Box 3, Melbourne VIC 3001

# Privacy Policy

**Who are we**

'We', 'us' and 'our' refer to Clarity Financial Group ACN 143 878 451, Australian Credit Licence 387423 and our related businesses.

**Our commitment to protect your privacy**

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it for, or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way that ensures the protection of your personal information.

Our commitment with respect to personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law.

**Personal Information**

When we refer to personal information, we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also include credit information.

Credit information is information that is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

The kinds of personal information we may collect about you include your name, date of birth, address, account details, occupation, and any other information we may need to identify you.

If you are applying for finance, we may also collect the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details, and proof of earnings and expenses. If you apply for any insurance product through us, we may also collect your health information. We will only collect health information from you with your consent.

**Why we collect your personal information**

We collect personal information for the purposes of assessing your application for finance and managing that finance. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time, we may offer you other products and services.

To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organisations that provide products or services used or marketed by us. We may also disclose your personal information to any other organisation that may have or is considering having an interest in your finance, or in our business.

**How do we collect your personal information?**

Where reasonable and practical, we will collect your personal information directly from you. We may also collect your personal information from finance brokers and other people, such as accountants and lawyers.

**Do we disclose personal information?**

We may disclose your personal information:

- to prospective funders or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance, such as third-party suppliers, printing and postal services, call centres;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as finance brokers, lawyers, and accountants;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth);
- to investors, agents or advisers, or any entity that has an interest in our business; or
- to your employer, referees or identity verification services.

# Privacy Policy

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

(a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
(b) you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

We may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

**Direct marketing**

From time to time, we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on (02) 6209 1990 or by writing to us at GPO Box 175, Canberra ACT 2601.

If the direct marketing is by email, you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

**Updating your personal information**

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you, we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

**Access and correction to your personal information**

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time.

We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make, we may respond to your request immediately, otherwise, we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious. An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate, or out of date, you may request that we correct the information. If appropriate, we will correct the personal information at the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

We may need to consult with other entities as part of our investigation. If we refuse to correct personal information, we will provide you with our reasons for not correcting the information.

**Using Government identifiers**

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

**Business without identifying you**

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

# Privacy Policy

**Sensitive information**

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

**How safe and secure is your personal information that we hold?**

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss, and unauthorised access, modification, or disclosure.

**Complaints**

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our complaints officer on (02) 6209 1990. We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer, you may make a complaint to the Privacy Commissioner, who can be contacted on either www.oaic.gov.au or 1300 363 992.

**Further information**

You may request further information about the way we manage your personal information by contacting us.

**Change in our privacy policy**

We are constantly reviewing all of our policies and attempting to keep up to date with market expectations. Technology is constantly changing, as are the law and marketplace practices.

As a consequence, we may change this privacy policy from time to time or as the need arises.

You may request this Privacy Policy in an alternative form. This Privacy Policy came into existence on 6 March 2014.