

Sydney Credit Union - Privacy Policy

Sydney Credit Union Ltd (ACN 087 650 726) ('we', 'us', 'our') is bound by the Australian Privacy Principles under the *Privacy Act* 1988 (Cth) (**Privacy Act**). We are also bound by Division 3 of Part IIIA of the Privacy Act, which regulates the handling of credit information, credit eligibility information and related information by credit providers; and the Credit Reporting Privacy Code.

This Privacy Policy outlines how we deal with your personal information (including credit-related information), as well as our legal obligations and rights as to that information. If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

1. INTRODUCTION

Sydney Credit Union (SCU) is strongly committed to protecting your privacy when you interact with us, our products and services.

As part of our business we are committed to providing a number of services to you. To provide these services it is necessary for us to collect, store use your personal information, and or disclose them to a 3rd Party.

SCU will only deal with your personal information in the ways we describe to you in this Policy.

2. OBJECTIVE

The objective of this Policy is to create a transparent framework about how and why we collect and use your information. In some cases, it is possible not to collect any personal information and if you do not want us to collect or use your information then we will give you the opportunity to say so.

3. KEY TYPES OF INFORMATION

Certain words have special meanings when used in this Privacy Policy. These are shown below.

"Personal information" means information or an opinion about an individual who is identified, or who can reasonably be identified, from the information. Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about the individual.

"Credit eligibility information" means information that has been obtained from a credit reporting body, or that has been derived from that information, that is about an individual's credit worthiness.

"Credit information" means personal information that includes the following:

- information about an individual, like their name and address, that we may use to identify that individual
- information about an individual's current or terminated consumer credit accounts and an individual's repayment history
- the type and amount of credit applied for in any previous consumer or commercial credit applications to any credit provider, where that credit provider has requested information
- information about an individual from a credit reporting body
- information about consumer credit payments overdue for at least 60 days and for which collection action has started
- advice that payments that were previously notified to a credit reporting body as overdue are no longer overdue
- information about new credit arrangements an individual may have made with a credit provider, in relation to consumer credit currently or previously held, to deal with any defaults or serious credit infringements by that individual
- information about court judgments which relate to credit that an individual has obtained or applied for
- information about an individual on the National Personal Insolvency Index
- publicly available information about an individual's credit worthiness, and

- an opinion of a credit provider that an individual has committed a serious credit infringement of credit provided by that credit provider.

We may not hold all of these kinds of information about a particular individual. However, if we hold any of these kinds of information, it is protected as "credit information" under this Privacy Policy.

"Credit-related information" means credit information, credit eligibility information and related information.

4. COLLECTION

Wherever possible, we will collect personal information (including credit information) directly from you. This information will generally come from what you provide in your application for one of our products or services and supporting documentation.

We only ask for personal information relevant to our business relationship with a customer. When you apply for one of our products or services, we may request:

- identifying information, like your name, address and other contact details and your date of birth
- information about your financial position, like your income, expenses, savings and assets, First Home Owner Grant applications and any (other) credit arrangements
- your employment details
- your tax residency details and taxpayer identification number (including tax file number), and
- your reasons for applying for a product or service, and
- details relevant to any hardship applications (for example, doctor's letter, pay slips, separation certificates).

We may also collect personal information (including credit-related information) about you from third parties, such as any referees that you provide, your employer, other credit providers and third party service providers including credit reporting bodies. Credit reporting bodies collect credit information about individuals which they provide as credit reports to credit providers and others in the credit industry to assist them in managing credit risk, collecting debts and other activities. (Specifically, we may disclose information to or collect information from Veda Advantage, whose privacy policy and contact details are at www.veda.com.au)

You can also ask a credit reporting body, through contact details on their website, not to use or disclose your personal information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud.

Some information is created through our internal processes, like credit eligibility scoring information.

5. USE OF PERSONAL INFORMATION

We may use your personal information (including credit-related information) for the purpose of providing products and services to you and managing our business. This may include:

- Verifying your identity;
- assessing and processing your application for the products and services we offer;
- establishing and providing our systems and processes to provide our products and services to you;
- executing your instructions
- charging and billing
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- our internal operations including record keeping, risk management, auditing purposes, training, securitisation, credit scoring, file reviews and portfolio analysis
- research and development
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems,

- to investigate, resolve and prevent complaints;
- conducting fraud assessments
- customer relations including management of our relationship with you and market or customer satisfaction research and product development
- offering you a product with an alliance partner organisation (including financial planner, insurer, or other third party that we have arrangements with)
- compliance with legislative and regulatory requirements (including without limitation the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and payment systems requirements, and where applicable, the Income Tax Assessment Act 1936; or
- direct marketing.

We do not use (or disclose) our personal information (including credit-related information) for a purpose other than:

- a purpose set out in this Privacy Policy
- a purpose you would reasonably expect
- a purpose required or permitted by law, or
- a purpose otherwise disclosed to you to which you have consented.

6. DISCLOSURE

We may disclose your personal information (including credit-related information) to other organisations, for example:

- external organisations that are our assignees, agents, contractors or alliance partners
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants
- insurers and re-insurers, where insurance is provided in connection with our services to you
- superannuation funds, where superannuation services are provided to you
- other financial institutions, for example, when you apply for a loan from another credit provider and you agree to us providing information
- credit reporting bodies, including disclosing that you are in default under a credit agreement or commit a serious credit infringement, if that is the case
- lenders' mortgage insurers, where relevant to credit we have provided
- debt collecting agencies, if you have not repaid a loan as required
- our professional advisors, such as accountants, lawyers and auditors
- state or territory authorities that give assistance to facilitate the provision of home loans to individuals
- certain entities that have bought or otherwise obtained an interest in our credit product, or that are considering doing so, and their professional advisors
- any organisation with which we are considering merging
- another person or body in connection with securitisation arrangements for the purpose of purchasing, funding, managing or processing an application for credit or undertaking a credit enhancement
- our referees, including your employer (to confirm details about you)
- employee referees, for the purpose of assessing a job application made to us
- external complaint resolution bodies (for example, the Financial Ombudsman Service), where required in connection with a complaint

- any person in Australia who has, or will, guarantee or provide property as security for the repayment of credit provided to you
- our representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you, or
- if required or authorised by law, to government and regulatory authorities.

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and privacy obligations with respect to the protection of your personal information.

We may disclose your personal information overseas, including your credit information and credit eligibility information. The countries where we are likely to disclose your personal information include New Zealand, Phillipines, USA, Canada, United Kingdom, Netherlands. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in this Privacy Policy.

We may also disclose your personal information (including credit-related information) to an individual or an organisation (a 'third party') if:

- you direct us to do so
- you consent to the third party obtaining the information from us, or
- you consent to the third party accessing the information on our systems, and/or do anything which enables the third party to obtain access.

Your consent to a third party obtaining or accessing information may be implied from:

- your use of any service or application which a third party provides to you, or makes available to you, which involves the third party obtaining or accessing personal information held by us or organisations like us, or
- you doing anything else which enables the third party to obtain access to the information.

7. SENSITIVE INFORMATION

Where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information about an individual's health, and membership of a professional or trade association.

Unless we are required or permitted by law to collect that information, we will obtain our consent. However, if the information relates directly to our ability to meet financial obligations that you owe to us, you are treated as having consented to its collection.

8. REFUSAL OF CREDIT APPLICATIONS

We may refuse an application for consumer credit made by you individually or with other applicants. Our refusal may be based on credit eligibility information obtained from a credit reporting body about either you, another applicant or another person proposed as guarantor. In that case, we will give you written notice that the application has been refused on the basis of that information. We will tell you the name and contact details of the relevant credit reporting body and other relevant information.

9. SECURITY

We take all reasonable steps to ensure that your personal information (including credit-related information), held on our website or otherwise, is protected from:

- misuse, interference and loss, and
- unauthorised access, disclosure or modification.

Your personal information may be held by us in paper or electronic form. All personal information is stored within secure systems which are in controlled facilities. There are restrictions on who may access personal information and for what purposes. Our employees, contractors, service providers and authorised agents are obliged to respect the confidentiality of personal information held by us.

If we suspect or believe that there has been any unauthorised access to, disclosure of, or loss of, personal information held by us, we will promptly investigate the matter and take appropriate action, and we will comply with any obligations in relation to notifiable data breaches that are in force under the Privacy Act.

We ask you to keep our passwords and personal identification numbers safe, in accordance with our guidelines.

You can also help to keep the personal information that we hold about you secure by taking care before you authorise or otherwise assist any third party to obtain or gain access to that information (see 'Disclosure' above). You should never provide or disclose any of your passwords or personal identification numbers to any third party to enable the third party to obtain or access to your personal information. If you do, you may breach the ePayments Code and the terms and conditions applying to the products and services we provide to you and you may be liable for any unauthorised transactions that subsequently occur.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we take reasonable steps to ensure that it is destroyed or de-identified.

10. WEBSITE

This section explains how we handle personal information and credit-related information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact our Privacy Officer, whose details are in paragraph 16 of this Privacy Policy, as there are other ways for you to provide us with your personal information.

Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about our visit, such as:

- the time and date of the visit
- any information or documentation that you download
- our browser type, and
- internet protocol details of the device used to access the site.

Our website also includes calculators, which may require you to enter your personal details. If you save the data you enter on the calculator, this information will be stored.

Cookies

A "cookie" is a small text file which is placed on our internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so might prevent you from accessing the secured pages of our website.

Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without our consent.

Security

We use up-to-date security measures on our website to protect your personal information and your credit information. Any data containing personal, credit or related information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at our own risk.

Links on our website

Our website may contain links to third party websites. The terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information or credit information, you will need to obtain a copy of their privacy policy.

11. ACCESS

You may request access to the personal information (including credit-related information) that we hold about you at any time from our Privacy Officer whose details are in paragraph 16 of this Privacy Policy.

We will respond to your request for access within a reasonable time. If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can contact our Privacy Officer if you would like to challenge our decision to refuse access.

We may recover the reasonable costs of our response to a request for access to personal information.

12. ACCURACY AND CORRECTION

We take reasonable steps to make sure that the personal information (including credit-related information) that we collect, use or disclose is accurate, complete and up-to-date. However, if you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting our Privacy Officer whose details are in paragraph 16 of this Privacy Policy.

13. MARKETING

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We are permitted to do this while you are our customer, and even if you are on the Do Not Call Register.

We may also provide our details to other organisations for specific marketing purposes.

We will consider that you consent to this, unless you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by contacting our Privacy Officer whose details are in paragraph 16 of this Privacy Policy, or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

To help us reach the right people with our direct marketing, we may ask a credit reporting body to "pre-screen" a list of potential recipients of our direct marketing against our eligibility criteria to remove recipients that do not meet those criteria. The credit reporting body cannot use information about your existing loans or repayment history in carrying out its pre-screening and it must destroy its pre-screening assessment once it has given us, or a contractor acting on our behalf, the list of eligible recipients. If you do not want your credit information used for pre-screening by a credit reporting body that holds credit information about you, you can opt-out by informing that credit reporting body, whose contact details are on their website.

14. CHANGES TO THE PRIVACY POLICY

We may make changes to this Privacy Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Privacy Policy is available on our website at www.scu.net.au.

15. QUESTIONS AND COMPLAINTS

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information (including credit-related information), please contact our Privacy Officer whose details are in paragraph 16 of this Privacy Policy. You can also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible. We will aim to deal with your complaint at the source of your complaint. If you are not satisfied with the response you receive, please let us know and our Member and Staff Relations Manager will investigate further and respond to you.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints. These are Financial Ombudsman Scheme which is our external dispute resolution scheme, the Office of the Australian Information Commissioner. Any of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

Financial Ombudsman Service

Post: GPO Box 3, Melbourne VIC 3001

Telephone: 1300 780 808

Website: www.fos.org.au

Office of the Australian Information Commissioner

Post: GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

16. PRIVACY OFFICER

Our Privacy Officer's contact details are:

Address: SCU Privacy Officer
19 Second Avenue,
Blacktown NSW 2148

Mail: Box 444,
Blacktown NSW 2148

Telephone: 13 61 91

Email: privacy@scu.net.au

Website: www.scu.net.au

17. DISCLAIMER

This Privacy Policy is provided for the purposes of information only. While we have taken care to ensure that it is accurate and current, we provide no guarantee as to its accuracy or currency. We accept no liability for loss or damage suffered as a result of reliance on the information provided in this Privacy Policy.