



Traditional Credit Union (TCU)

# Privacy Policy

[www.tcu.com.au](http://www.tcu.com.au)

ABN 50 087 650 922

AFSL/Australian Credit Licence 244 255 Version 3

May 2017

## ***Traditional Credit Union*** **Privacy Policy**

Traditional Credit Union (ABN 50 087 650 922) ('we', 'us', 'our') is bound by the Australian Privacy Principles of the Privacy Act 1988 (Cth) (Privacy Act) in our handling of your personal information. 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.

We may tell you more about how we handle your information at the time we collect it.

# 1. Key types of information

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

“Personal information” is information or an opinion about an identified individual or who can reasonably be identified, from the information.

## 2. 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 member. 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 and any (other) credit arrangements
- your employment details
- your tax file number, and
- your reasons for applying for a product or service.

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. 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.

## 3. Use

We 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:

- assessing and processing a membership request
- to identify you and verify your identity
- establish and administer your account/s
- executing your instructions
- uses required or authorised by law
- collecting overdue payments due under a loan contract
- managing our rights and obligations regarding external payment systems, or
- direct marketing.

In general, we do not use or disclose your 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.

## 4. Disclosure

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

- our related bodies, assignees, agents, contractors and companies
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants
- insurers, where insurance is provided in connection with our services to you
- other credit providers and financial institutions
- 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
- debt collecting agencies, if you have not repaid a loan as required
- our professional advisors, such as accountants, lawyers and auditors
- your 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.

When we disclose your information to third parties, we limit their use and disclosure of that personal information to the specific purpose for which it is disclosed and require them to protect your information in accordance with the Privacy Act.

We may disclose your personal information overseas, including your credit information and credit eligibility information. 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.

## 5. 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 your consent. However, if the information relates directly to your ability to meet financial obligations that you owe to us, you are treated as having consented to its collection.

## 6. Credit related personal information

Credit-related personal information includes information about your credit history or creditworthiness obtained from a Credit Reporting Body.

The CRB's we may use include:

Equifax and Dun & Bradstreet

You may obtain the privacy policies of the organisations' by contacting them direct.

## 7. Security

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

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

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

## 8. Website

This section explains how we handle personal information and credit 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 14 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 your visit, such as:

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

### Cookies

A “cookie” is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (i.e. 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 (i.e. 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 your 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 you, is entirely secure. You use our website at your 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.

# 9. Access

You may request access to the information (including credit-related information) that we hold about you at any time from our Privacy Officer whose details are in paragraph 14 of this Privacy Policy.

We will respond to your request for access within a reasonable time there is no fee for making a request but we may charge you the reasonable costs of providing our response to a request for access to personal information.

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

# 10. Accuracy

We take all 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 inaccurate, out of date or incomplete, you can request that we update this information by contacting our Privacy Officer whose details are in paragraph 14 of this Privacy Policy.

# 11. 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, even if you are on the Do Not Call Register.

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

We will consider that you consent to this, unless you tell us not to. You can make this request by contacting our Privacy Officer whose details are in paragraph 14 of this Privacy Policy, or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

## 12. Changes to this 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.

## 13. Complaints, questions and concerns

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 14 of this Privacy Policy.

Once a complaint has been lodged, the Privacy Officer will respond to you within 30 days.

If you are not satisfied with the response you receive, please let us know and our Chief Executive Officer 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 Service Ltd**  
**Post:** GPO Box 3, Melbourne VIC 3001  
**Telephone:** 1800 367 287  
**Website:** [www.fos.org.au](http://www.fos.org.au)

**Office of the Australian Information Federal Privacy Commissioner**  
**Post:** GPO Box 5218 Sydney NSW 2001  
**Telephone:** 1300 363 992  
**Website:** [www.oaic.gov.au](http://www.oaic.gov.au)

Either 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.

## 14. Privacy Officer

Our Privacy Officer's contact details are:

TCU Privacy Officer  
PO Box 40425 Casuarina NT 0811  
**Telephone:** 8999 0777  
**Email:** [info@tcu.com.au](mailto:info@tcu.com.au)

## 15. Disclaimer

This Privacy Policy is provided for the purposes of information only.