

Privacy Policy

Traditional Credit Union Limited (TCU, '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 Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

TCU understands your concerns about the privacy and security of your personal information, and we are committed to protecting it. TCU offers a range of banking products and services and to provide these we need to gather personal information.

1. Key types of information

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

"Personal information" means information or an opinion about an identified individual or an individual who is reasonably identifiable. Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about an 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, age, address and employment details, that we may use to identify that individual;
- information about an individual's current or terminated consumer credit accounts and their 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 Policy.

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

2. How will we collect, use and disclose your personal information?

(a) Collection We will primarily collect personal information about you (including credit-related information) directly from you or via a method authorised by you (e.g. in an application, over the telephone, face to face, through mobile banking app or our website). This information will generally come from what you provide in relation to an applications for membership and/or for our products or services and supporting documentation.

We only ask for personal information relevant to our business relationship with you. 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;
- your tax residency details and taxpayer identification number if you are a foreign resident for tax purposes;
- your reasons for applying for a product or service;
- in some circumstances, your personal goals, objectives, and specific needs; and
- any information we are required or authorised to collect by law.

Your image may also be captured through security camera's located in our branch locations. These images are secure and are destroyed when no longer needed.

In some circumstances, we may 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.

(b) Use 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:

- 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, billing and recovering overdue payments;
- uses required or authorised by law;
- maintaining and developing our business systems and infrastructure;
- research and development;
- collecting overdue payments due under our credit products;
- managing our rights and obligations regarding external payment systems; and
- marketing, including 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 Policy;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise disclosed to you, or a purpose requested by you and to which you have consented.

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

- external organisations that are our assignees, agents or contractors;
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants;
- 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;
- 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 your credit product, or that are considering doing so, and their professional advisors;
- any organisation with which we are considering merging;

- 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.

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 will not disclose your personal information (including credit-related information) overseas. 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.

3. 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. For example, we may collect health information about you to access your request for a financial hardship arrangement.

Unless we are required or permitted by law to collect that information, we will obtain your express consent (except where you consent can reasonably be implied from specific nature of our dealings).

4. 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.

5. Keeping your information secure

We may hold personal information (including credit related information) in computer systems, electronic form, digital records, telephone recordings and/or in paper files. We take all reasonable steps to ensure that your personal information (including credit-related information) is protected from:

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

We will also only keep your personal information (including credit-related information) for as long as it is needed (including when we are no longer required by law to keep such records). When your personal information is no longer needed, we will take reasonable steps to ensure that it is destroyed or de-identified.

6. Website and Apps

This section explains how we handle personal information (including 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 us, refer to details at paragraph 12 of this Policy, as there are other ways for you to provide us with your personal information.

(a) 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.

Our website also includes a number of 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.

(b) 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 (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.

(c) 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, provided by you when you send us an email, 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.

(d) Security We use up-to-date security measures on our website to protect your personal information (including credit-related 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 your own risk.

(e) Links on our website Our website may contain links to third party websites. The terms of this Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information (including credit-related information), you will need to obtain a copy of their privacy policy.

7. Can you get Access to your Personal Information held by us?

You may request access to the personal information (including credit-related information) that we hold about you at any time by contacting us. If the request for information relates to information that is readily accessible to us, we will provide it to you immediately. You will need to provide us with sufficient identification before we can allow you access to any personal information.

We will respond to your request for access within a reasonable time. We may recover the reasonable costs of our response to a request for access to personal information. See our Interest, Fees And Charges Brochure for full details of the costs involved in accessing your personal information.

Only in limited circumstances can we deny you access to your personal information. 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 us if you would like to challenge our decision to refuse access.

8. What if your information is not accurate, up-to-date or complete?

We take reasonable steps to make sure that the personal information (including credit-related information) that we collect, hold, 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 the information by contacting us, refer to details in paragraph **Error! Reference source not found.**2 of this Policy.

9. Marketing

We may use your personal information, including your contact details, to provide you with information about products and services, including those of other organisations, which we consider may be of interest to you, unless you request not to receive marketing communications. If you are on the Do Not Call Register, while you are our customer we will infer from our relationship with you that you consent to receiving telemarketing calls from us, unless you notify us that you do not wish to receive such calls.

You may request, at any time, not to receive marketing communications or not to receive them through a particular channel, like email. You can make this request by contacting us, refer to details in paragraph 12 of this Policy, or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

Unless we have first obtained your consent, we will not provide your personal information to other organisations to use for their marketing purposes.

10. Changes to the Privacy Policy

We may make changes to this Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Policy is available on our website at <https://tcu.com.au/privacy-policy-2/> and at any of our branches.

11. Privacy Questions and Complaints

If you have any questions, concerns or complaints about this Policy, or our handling of your personal information (including credit-related information), please contact us, refer to details in paragraph 12 of this Policy. You can also contact us if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint is lodged with us, we 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 we will investigate further and respond to you.

If you are still not satisfied, you can contact the Australian Financial Complaints Authority which is our external dispute resolution scheme, the Office of the Australian Information Commissioner or, in the case of insurance-related privacy complaints, the Australian Prudential Regulation Authority (all contact details are listed below). 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.

Australian Financial Complaints Authority

Post: GPO Box 3 Melbourne VIC 3001

Telephone: 1800 931 678

Website: www.afca.org.au

Office of the Australian Information Commissioner

Post: GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

(visit this website for further information about privacy laws)

Australian Prudential Regulation Authority

Post: GPO Box 9836, Sydney NSW 2001

Telephone: 1300 558 849

Website: www.apra.gov.au

12. How to contact us

You can contact us in any of the following ways:

Address: 9 Rowling St, Casuarina NT 0810
Post: PO BOX 40425, Casuarina NT 0811
Telephone: 08 8999 0777
Website: www.tcu.com.au
Email: info@tcu.com.au