

In the normal course of servicing your financial needs, we sometimes ask you for personal information.

You can rest assured we handle such information in a strictly confidential manner. We consider protection of your privacy to be fundamental to the way we operate.

The following information sets out our policy on how we manage your personal information by providing you with details on how we collect, hold, protect, use, disclose and maintain your personal information. Importantly, there is also an introduction to your rights.

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## PROTECTING YOUR PRIVACY

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we do business. As an Authorised Deposit-taking Institution (ADI) governed by the Australian Prudential Regulatory Authority (APRA), we value and handle your personal information, including sensitive information, confidentially.

Personal information is information or an opinion about you.

This Privacy Policy explains how we will manage and protect your personal information, including information that we collect during the course of providing an account or service to you and the information we hold after your account or service is terminated (where we are required to hold this information or it is necessary for our functions). This Privacy Policy also applies to information that we collect from third parties including the information we receive through the credit reporting system.

You can find specific information about our credit reporting practices on [page 3](#).

This Privacy Policy contains information about how you can access the information we hold about you ([page 6](#)), how you can ask us to correct your information ([page 7](#)) and how you can raise an issue if you have concerns about how we have managed your information ([page 7](#)).

## HOW TO CONTACT BANK OF US

If you have any questions or would like more information about this Privacy Policy you can call our Contact Centre on 1300 306 716 (8.30am – 5.00pm AEST week days) or email your question or request to [info@bankofus.com.au](mailto:info@bankofus.com.au).

## OUR PRIVACY FRAMEWORK

We are bound by the Privacy Act and the 13 Australian Privacy Principles (APPs) set out in that Act. The APPs regulate the way that certain entities handle personal information. As a participant in the credit reporting system, we are also bound by the rules in the Privacy Act which apply to credit reporting. More information about our credit reporting practices can be found on [page 3](#). The Privacy Act does not apply to the handling of information that does not relate to individuals – for example, information about companies.

## OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

In the event that a complaint is made regarding our compliance with the APP's, that complaint will be dealt with in accordance with our Internal Dispute Resolution Scheme (IDRS). Details of our IDRS are

contained within our 'Resolving your concern brochure' which is available from any one of our stores or via our website at [www.bankofus.com.au](http://www.bankofus.com.au). In the unlikely event that we cannot resolve your complaint, you may contact the Australian Financial Complaints Authority (AFCA) for a free independent review of the matter. Details for contacting AFCA are available on our website or from our 'Resolving your concern' brochure.

Any requests received are welcomed by us as part of this policy.

Requests for information will be satisfied verbally or by the provision of, and associated explanation from, this policy. Where necessary, reference to this document will be performed by our staff to help in answering any queries relating to management of personal information.

## **ANONYMITY AND PSEUDONYMITY**

In situations where we are obtaining feedback or comments from existing or potential customers and the identity of the customer is irrelevant to the information received, then we will collect such information anonymously. An example of this would be via a customer survey.

In certain circumstances, such as a complaint regarding a staff member, we will allow an individual to remain anonymous or to use a pseudonym. This option will only apply when it does not contravene any lawful regulation or other requirement allowed by law that requires identification of an individual.

## **COLLECTION OF PERSONAL INFORMATION**

Wherever possible, we will collect personal information directly from customers for the purpose of assessing their application for, and then providing the ongoing support of, Bank of us accounts and/or facilities. Such personal information will initially be collected at the time our customers apply for the respective account and/or facility and will be limited to the type of personal information we require to assess the application (and provide the ongoing support).

For each subsequent product and/or facility that is applied for, we will review and update the personal information that is held (where necessary). This is to ensure that the personal information held is sufficient to enable us to both accurately assess the new application and provide the ongoing support of the new account and/or facility.

We will only collect personal information as a result of a customer applying for a Bank of us account or facility or when a customer advises us of a change in the personal information that is held for them. As a result, we will ensure that the collection of personal information is completed in a lawful manner and is not intrusive in any way.

We will collect information at the time a customer first applies for a Bank of us account and/or facility and we collect their personal information to assess the application (and to provide ongoing support of the account(s) and/or facility(s)). We will retain the required information in our standard forms that we use to specifically collect the personal information, in the relevant account/facility application form and on our banking computer system/s.

Where we are advised of updated personal information we will do so primarily via our standard forms that will be completed and signed by the customer. If we update personal information using any other means e.g. based on a verbal instruction, fax or e-mail received, we will only alter that information once we verify that the instruction is from the customer who owns the personal information.

NOTE: We may be required/authorised to collect personal information from someone who is responsible for the customer (other than the customer themselves).

**For example:**

- A parent or guardian, if they are a young child and are unable to provide the personal information
- The donee, if an authority (such as an enduring Power of Attorney) is in place, giving someone else (the donee) the right to provide the information on the customer's behalf.

## **Information collected via our website and associated use**

When customers visit our website we may collect information about the visit to help improve and maintain the security measures we have in place and to learn more about the customer so that any marketing we may provide is more relevant.

Information that we may collect for these purposes include:

- The time and date of the visit;
- The information or documentation that is downloaded by the customer;
- The customer's browser type;
- Areas of the website that the customer visited and any errors they may have experienced; and
- Internet protocol (IP) details of the customer's device that was used to access the site

We need to collect a customer's IP address to enable their interaction with other areas of our website. A customer's IP address will not be used by us or released to any third party except for security purposes, where inappropriate behaviour or activity has occurred, or in relation to suspected fraud activity such as fraudulent transactions or unauthorised access to a customer's computer system.

When a customer visits our website and accesses our secure Internet Banking platform, we use 'cookies' for security and personalisation purposes. We also use 'cookies' for visits to unsecured pages of our website i.e. public pages that are accessible without providing Internet Banking login details, to obtain information about how our website is being used.

A 'cookie' is a small text file which is placed on a customer's Internet browser and which can be accessed each time that customer visits our website. Changes to Internet browser settings can be made to reject 'cookies' however doing so may prevent access to secured pages of our website.

Sometimes we may use an external service to collect information and reports about our website usage. This may include without limitation:

- Google;
- Optimizely;
- Facebook; and
- Other social networking or online data analytical tools.

Our website may also contain links to relevant third-party websites. The terms of this Privacy Policy do not apply to external websites. Information about the privacy policy of external websites should be obtained directly from those entities.

## **COLLECTING INFORMATION REQUIRED BY LAW**

We may collect information from you because we are required or authorised by an Australian law, court or tribunal order to collect that information. We will tell you if collection is required or authorised by law and provide you with details of the law, court or tribunal order. For example, when you open a

deposit account or take out a loan, we are required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* to collect certain information from you to prove your identity; this may be your driver's licence, passport details or a copy of your birth certificate.

We may collect your Australian tax file number (TFN) when you open a deposit account. It is not compulsory to provide your TFN, but if you do not, we are required to deduct withholding tax from your interest payments at the highest marginal rate. We will only collect your TFN to determine whether you are subject to withholding tax on any interest payments you receive and for no other purpose. If we collect your TFN, we will handle your TFN in accordance with the Privacy Act and Guidelines issued by the Commissioner.

The *National Consumer Credit Protection Act 2010* requires credit providers like Bank of us to make inquiries into the financial situation, needs and objectives of individuals who apply for consumer credit. This is to ensure the credit provider has all the information including the individual's financial commitments, income and liabilities to assess the individual's suitability for the credit they are applying for.

We may also be required to ask about your tax residency status under taxation information sharing agreements the Australian Government has in place with other countries. For instance, the Common Reporting Standard (CRS) developed by the Organisation for Economic Co-operation and Development (OECD), requires us to ask account holders of some types of products whether they are an international resident for taxation purposes. If you are a tax resident of another country, the relevant standard or law may require us to collect your relevant foreign tax identification number.

## COLLECTING INFORMATION FROM THIRD PARTIES

There may be occasions when we collect personal information about you from a third party.

### For example, we may collect personal information from:

- A parent Credit Reporting Agency if we request a report about your credit history (more information about our Credit Reporting practices can be found in the following section);
- Other credit providers if we request information from them about the products they provide to you;
- Organisations that we have an arrangement with to jointly offer products and/or has and/or to promote a product or service such as CGU Insurance; and
- Brokers and other parties who may have introduced you to us.

## CREDIT REPORTING

Bank of us participates in the national credit reporting system. If you apply for credit assistance from us, we will request a credit report about you from a credit reporting agency. Credit reports contain information which assists us to assess your suitability for credit and includes information about your credit history with other credit providers.

To request a credit report, we will provide information to the credit reporting body that identifies you, as well as information about your application – including the account or service and the amount of credit you are applying for.

In addition to collecting information about your credit history from a credit reporting agency, we also collect this type of information through your use of our products. We may use this information to determine whether you need assistance to meet your repayment obligations.

Some of this information about the credit you hold with us is disclosed to a credit reporting body so it can be included in your credit report and shared with other credit providers that participate in the credit reporting system.

We will also need to assess your suitability if you wish to be a guarantor for another person. In these cases we will obtain information about you from a credit reporting agency.

Occasionally, we may collect your credit information directly from other credit providers, including other ADI's. We will collect information from other credit providers only with your consent.

Under the Privacy Act, credit providers can disclose certain information about your credit history to credit reporting agencies. Participation in credit reporting ensures we are able to make suitably informed decisions about providing credit to individuals. The Privacy Act restricts the purpose for which credit providers can access and use information that is held by credit reporting bodies.

### **We may disclose the following information about your credit to credit reporting agencies:**

- The type of credit provided;
- The amount of credit provided;
- The repayment history including timeliness of payment, failure to make a payment or defaulting on your obligations;
- The term of your credit contract; and
- When the account is opened and closed.

### **We disclose information to the following credit reporting agencies:**

Equifax Pty Ltd  
Phone: 1300 850 211  
Mail: Equifax Pty Ltd  
PO Box 964  
North Sydney NSW 2059

Tasmanian Collection Service  
Phone: (03) 6213 5555  
Mail: Tasmanian Collection Service  
PO Box 814H  
Hobart, Tas 7001

## **SENSITIVE INFORMATION**

We will not request or require sensitive information to be provided by customers when applying for any Bank of us account or facility. All our application forms, which are used to collect personal information for customers, contain requests for non - sensitive information only.

In situations where a request for sensitive information is contained in an application form for a service that is provided by a company with whom we have a formal agreement such as CGU Insurance (Aust) Ltd, the information will be collected for forwarding to that company. Under no circumstance will that information be retained or used by us.

## **DEALING WITH UNSOLICITED PERSONAL INFORMATION**

We will either return to you or, de-identify any unsolicited personal information that it receives at your request. In the event that we are unable to contact you, the information will be de-identified as soon as practicable where it is lawful and practicable to do so.

## **NOTIFICATION OF THE COLLECTION OF PERSONAL INFORMATION**

In circumstances where we collect personal information from someone other than the individual, or the individual may not be aware that the organisation has collected the personal information, we will take reasonable steps to notify an individual, or otherwise ensure that the individual is aware that we collect or have collected the information and the circumstances of that collection.

## **USE OR DISCLOSURE OF PERSONAL INFORMATION**

We will collect personal information from customers to assess their application for, and to provide ongoing support of, Bank of us accounts and/or services. This is the primary purpose. We may use that personal information for each subsequent product and/or facility that is applied for. However we will review and update that information where necessary to ensure that the personal information held is sufficient to enable us to both accurately assess the new application and provide the ongoing support of the new product and/or service.

### **We may also use your information in any of the following ways:**

- To manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, collecting debts and market or customer satisfaction research);
- To consider any concerns or complaints you raise against us and/or to manage any legal action between you and us;
- To prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- To identify you or establish your tax status under any Australian or foreign legislation, regulation, standard or treaty pursuant to an agreement with any tax authority; and
- As required by relevant laws, regulations, codes of practice and external payment systems.

## **DIRECT MARKETING**

We may use customer information to provide customers with details of products and services that may be of interest to them.

We will request consent from all new customers for the use/potential use of their personal information for direct marketing purposes.

We will make every effort to ensure that we only use a customer's personal information for direct marketing purposes where they have previously provided their consent.

In each direct marketing communication with a customer (either written or verbal), we will advise the customer that they can elect to not be included in any further direct marketing undertaken by us.

## **CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION**

In some circumstances, the nature of the account or service you request may require us to disclose your information overseas. For example, if you request to transfer funds to an overseas account using a telegraphic transfer, we will be required to disclose your information to overseas banks that are involved in making the payment.

We will ensure that we only disclose personal information about a customer to someone (other than the customer) who is in a foreign country if:

- The cross-border disclosure of information is authorised by the customer (or a person responsible for the customer); or
- Where the cross-border disclosure is required or authorised by or under an Australian law, or a court/tribunal order.

## **ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS**

The only identifiers (Commonwealth, State or Territory Government) that will be used by us will be done so as a requirement of identification or tax file number legislation. We will not use these identifiers in any capacity other than to satisfy such legislative requirements.

***We will adopt no such identifiers unless required by an Australian law or a court/tribunal order.***

## **QUALITY OF PERSONAL INFORMATION**

We request all customers to advise us of any discrepancies that may be identified in the personal information that we hold for them. It is in the best interests of both Bank of us and our customers that all personal information held is accurate, up to date, complete and relevant at all times.

On receipt of advice of any required changes to personal information, we will attend to the required changes as soon as practical. In most instances this will be on the same day that the advice is received.

## **SECURITY OF PERSONAL INFORMATION**

Any information that we collect and hold for customers on our banking computer system/s is safeguarded to prevent unauthorised access or interference by anyone other than our staff or our designated Agents.

Some of the things that we do to protect the information (data) we hold for customers on our system/s include:

- Using up-to-date security measures on our website to protect both personal and credit information;
- Encrypting any data containing personal, credit or related information which we transmit via the internet;
- Performing regular reviews and security testing of our systems used to store personal information
- Limiting access to staff and/or service providers who have been authorised to access the information for a purpose listed in this Privacy Policy.

We will ensure that all employees sign/continue to sign confidentiality agreements; these agreements cover all personal and financial information that is collected by, and accessible within Bank of us or via our systems.

We may store/continue to store “hard copies” of all customer information in an environment maintained by physical security such as lockable filing cabinets within a store or office that is in turn monitored by security systems.

We will ensure that in situations where a function is outsourced to a third party service provider and we need to disclose personal information to that third party service provider to enable that

outsourcing to be completed, that the provider is bound/continues to be bound by strict confidentiality agreements. As such, these providers will not be permitted to use a customer's personal information for any purpose other than that for which we have specifically appointed them.

We will retain information with consideration of a number of issues, including the need for the information to support the ongoing operation of the account/facility, any specific legislative requirements that impact the information and our internal audit requirements.

In the unlikely event of a data breach, we are committed to complying with the Notifiable Data Breaches Scheme (NDB) as established by the *Privacy Amendment (Notifiable Data Breaches) Act 2017*.

## **ACCESS TO PERSONAL INFORMATION**

We will provide customers with access to, or information about, the personal information that we hold irrespective of the means by which that information is held.

We will always verify the identity of the customer and their right of access to, or information about, the personal information before proceeding.

In certain circumstances, we may not be able to tell you what personal information is held about you. In these circumstances, we will write to you to explain why we are unable to provide you with the information and attempt to find alternative means to enable you to access your information.

We will satisfy requests for access to, or information about, personal information as soon as practical, considering both the form of the request (written or verbal) and the work involved in satisfying that request. For example, a request that requires us to provide numerous System screen printouts and to review and copy personal information contained in a file(s), will take considerably longer than a request that in effect can be satisfied verbally. However, in all circumstances the maximum timeframe for satisfaction of a request for access to or provision of personal information under our policy, is 30 days from receipt of the initial request.

Outside of our standard fees as detailed in our "Schedule of Fees and Charges", there will be no fee charged for the correction of personal information. In cases where provision of personal information requires access to archived information, the information is not readily available or the request is complex, a reasonable fee may be charged for processing the request.

## **CORRECTION OF PERSONAL INFORMATION**

If you believe that the personal information we hold is inaccurate, incomplete or out-of-date, you should contact us using the contact details in the 'Resolving your concerns' section following.

We will promptly update any personal information that is inaccurate, incomplete or out of date. If you ask us to correct information that we have received through the credit reporting system or information we have previously disclosed to credit reporting bodies, we will consult with other credit reporting bodies and credit providers about the accuracy of your information, as necessary. If we do not agree that your information is inaccurate, incomplete or out of date, we will write to you and tell you the reason(s) why we do not agree with you. We will also tell you what you can do if you are not satisfied with our response.



## RESOLVING YOUR CONCERNS

You are entitled to complain if you believe that your privacy has been compromised or that we have breached the Privacy Act, or an applicable code.

If you have a privacy complaint, you can contact the person, or store that you have been dealing with. Alternatively, you can lodge a complaint online at [www.bankofus.com.au](http://www.bankofus.com.au) or via our Contact Centre.

### **Contact Centre:**

Phone: 1300 306 716 (8:30am – 5:00pm AEST weekdays)

Mail: Bank of us

PO Box 194

Launceston TAS 7250

E-mail: [info@bankofus.com.au](mailto:info@bankofus.com.au)