



18. PRIVACY POLICY

1. Introduction

Central Murray Credit Union ('we', 'us', 'our') is bound by the Australian Privacy Principles (APP) 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 Policy outlines how we deal with your personal information (including credit-related information), as to our legal obligations and rights to that information. If we agree with you to use or disclose any or 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.

This Policy sets out how we manage your information. It sets out:

- What information we collect and hold;
- When you apply for a loan - what information we use from your credit report
- How we collect and hold information
- Why we collect, hold, use and disclose your information
- How you can access your information
- How you can correct your information
- How we deal with rejected credit applications
- How we deal with direct marketing
- How you can complain about the handling of your personal information

2. Information we collect and hold

We will collect and hold:

- Your name, date of birth and evidence of identity
- Your tax file number
- Credit and debits to your account.

When you apply for a loan we will also collect and hold:

- Information about your financial position
- Your current credit history

We will only collect information that is related to our providing, or arranging others to provide:

- Banking products and services
- Financial advisory services
- Financial accommodation
- General insurance
- Travel services

3. How we collect your Information

We will collect information about you and your financial position from you directly.

When you apply for a loan, we will collect information about your credit history from a credit reporting agency.

4. What information do we use from a credit report

We will look at the following information:

- What are your current loans
- What loans have you applied for
- If available, your repayment history on any loans and your default history
- Any payment defaults reported by service providers such as Telco's and energy companies
- Whether there are any Court judgements against you
- Whether you are, or have recently been, a bankrupt
- Whether you have committed any serious credit infringements

Your credit report will usually only contain information for the last 5 years. It may contain information from up to the past 7 years if you have committed a serious credit infringement.

We may ask you to explain why your credit report differs from what you have told us about your financial history.

5. Why we collect, hold, use and disclose personal information

We collect and use your personal information for a number of purposes, such as:

- Providing membership benefits, financial services and products or information about those benefits, services and products.
- Providing you with information about financial services and products from 3rd parties we have arrangements with
- Conducting market or customer satisfaction research.

We also collect and hold personal information as required by law, for example:

- For our register of members
- To verify your identity
- To assess your capacity to re pay a loan.

We collect and use your information:

- When you apply for a loan – to establish your eligibility for a loan and your capacity to repay
- When you have a loan with us – to disclose the following information to a credit reporting body:
 - The fact that you have applied for a loan
 - Details of the loan, when approved

- When payments are due
- Whether you have paid on time
- When you actually made a payment.

We disclose your information to other entities such as:

- Entities that verify identity
- Lawyers, conveyancers, accountants, brokers and agents representing you
- Contractors for statement printing and mail out, card and cheque production, market research or direct marketing
- Affiliated product and services suppliers to provide information to you about their services and products
- Credit reporting bodies and other financial institutions that have previously lent to you
- Persons you use as referees
- For property loans – property valuers and insurers
- Mortgage documentation service
- Trustee and manager of securitised loan programs
- Any proposed guarantor of a loan
- Debt collection agencies, lawyers, process servers
- Our auditors

We will also disclose your information to law enforcement and government agencies as required by law or to assist with their enforcement activities.

We do not currently disclose your information to overseas recipients.

6. How we hold your information

We hold your information in our banking system and on site filing system. We take all reasonable steps to ensure that your personal information (including credit related information) held is protected from:

- Misuse, interference and loss
- Unauthorised access, disclosure or modification.

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

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

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 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.

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 or 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. Electronic Communication

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 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.

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 list or used for any other purpose without your consent.

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 party handles your personal information or credit information, you will need to obtain a copy of their privacy policy.

10. How you can access and/or correct your information

You can request access to your information at any time. If the information we hold is incorrect, you can request us to correct it.

You can make a request by contacting one of our branches or by telephone.

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

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, and 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 opt out. You may opt out at any time if you no longer 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 (except those received via statements) to you or disclose your information to other organisations for marketing purposes. You can make this requesting by contacting our Privacy Officer as per section 13.

12. Questions and complaints

If you have any questions, concerns or complaints about this Policy, or the handling of your personal information (including credit related information), please contact our Privacy Officer whose details are in section 13. 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 time of your complaint. If you are not satisfied with the response you receive, please let us know and our Privacy Officer will investigate further and respond to you.

If you still are not satisfied, you can contact external bodies that deal with privacy complaints. These are the Financial Ombudsman Service Limited which is our external dispute resolution scheme, the Federal Privacy Commissioner or, in the case of insurance-related privacy complaints, the Australian Prudential Regulation Authority. 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

GPO Box 3, Melbourne Vic 3001

Telephone: 1300 780 808

Website: www.fos.org.au

Federal Privacy Commissioner

GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

Australian Prudential Regulation Authority

GPO Box 9836, Sydney NSW 2001

Telephone: 1300 558 849

Website: www.apra.gov.au

13. Privacy Officer

Our Privacy Officer's contact details are:

Address: 58 Belmore Street, Yarrowonga Vic 3730

Telephone: 03 5744 3713

Email: jbarnes@cmcu.com.au