



## Privacy Policy

Effective date 25/9/17

Hunter United Employees' Credit Union Limited (ACN 087650182) AFSL and Australian Credit Licence 238316 ('we', 'us', 'our') is bound by the Privacy Act 1988 (Cth) (Privacy Act).

This Privacy Policy outlines how we deal with your personal information (including credit-related 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. 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. Personal information includes credit information.

Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about you.

"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 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 Privacy Policy.

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

### 2. Collection

Wherever possible, we will collect personal information (including credit-related information) directly from you. This information will generally come from what you provide in your application for membership or one of our products or services and supporting documentation. It may be obtained when you open an account; fill in an application form; deal with us over the telephone; send us a letter or email; visit our branch, website or post information on our Facebook page. The type of personal information we hold will depend on the product and service you request from us. If you do not provide your personal information we cannot provide our products or services to you.

We only ask for personal information relevant to our business relationship with you as a customer. We may collect:

- 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 residency details and taxpayer identification number (including tax file number), and
- your reasons for applying for a product or service.

If you use our website or Facebook page, we collect the personal information that you tell us about yourself. For example, by completion of an online form, by sending us an email or making any postings.

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

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information. For example, where you make general enquiries about interest rates or current promotional offers.

### 3. Use

We may hold and 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 operating our systems and processes to provide our products and services to you;
- managing our relationship with you including executing your instructions, direct marketing, charging and billing, managing our rights and obligations regarding external payment systems or collecting overdue payments due under our credit products;
- uses required or authorised by law; or
- maintaining and developing our business systems and infrastructure.

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

- as set out in this Privacy Policy and in the privacy consent and notification;
- 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:

- any related companies;
- 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;
- 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 finance we have provided or you have asked us to provide;
- 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 finance 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 may disclose your personal information to recipients who are based overseas. It is not practicable to list every country in which such recipients reside. Overseas recipients may not be bound by the Privacy Act. However, if we do disclose your personal 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. Disclosures to Credit Reporting Bodies

The law requires us to advise you of disclosures we may make to credit reporting bodies in relation to how we may use your credit information

We exchange your credit information with credit reporting bodies. We use the credit information that we exchange with the credit reporting bodies to assess your credit worthiness, assess your application for finance, and manage your finance.

If you fail to meet your payment obligations in relation to any finance that we have provided or arranged, or you have committed a serious credit infringement, then we may disclose this information to 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 (including credit-related information) if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud.

### 6. Disclosures to other third parties

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.

Under the AML/CTF Act, we can disclose your personal information to a third party as part of the identity verification process. The purpose of this disclosure is to assess whether the personal information disclosed matches (in whole or part) personal information about you held in their records (if any) or the records of document issuers and/or Official Record Holders. This electronic verification process helps us to verify your identity.

The third party may prepare and provide us with an assessment by matching the personal information about you against that contained in its records or those of document issuers and/or Official Record Holders. If you do not consent to us verifying your identity by electronic verification, we will provide you with an alternate verification process to identify you.

We keep full and proper records of all disclosures, confirmations and consents.

## 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 a finance product made by you individually or with other applicants. Our refusal may be based on credit eligibility information obtained from a credit reporting body about 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.

• We do this by:

- maintaining up-to-date security and access requirements for our IT systems, such as passwords, firewalls and virus scanning software;
- having document storage and destruction policies;
- only providing you with your personal information where we are satisfied as to your identity; and
- encrypting data and other personal information during internet transactions (if any).

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 your passwords and personal identification numbers safe, in accordance with our suggestions.

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.

If 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 (including credit-related information) and credit information collected from our website.

### 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.

### 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.

### 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 (including credit-related information), you will need to obtain a copy of their privacy policy.

## **11. Updating your Personal Information**

If we have accurate personal information about you, it enables us to provide the best possible service. 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.

If you believe your information is incorrect, incomplete or not current, you can contact us and request that we update this information. We will generally rely on you to assist us by informing us if the information we hold about you is inaccurate or incomplete. We will acknowledge your request within seven days of receiving your request. We may need to contact other credit providers or credit reporting bodies to properly investigate your request. Where reasonable, and after our investigation, we will aim to provide you with details about whether we have corrected the personal information within 30 days.

## **12. Access and Correction of Personal Information**

You may request access to the personal information (including credit-related information) that we hold about you at any time. Generally, we acknowledge your request for access within seven days of receiving your request. Depending on the type of request that you make, we may respond to your request immediately. We will aim to provide you with the outcome of our investigation within 30 days.

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

If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal.

You can contact our Privacy Officer if you would like to challenge our decision to refuse access.

## **13. Unsolicited Collection**

In circumstances where we receive your personal information (including credit-related information) without requesting it, we will decide whether or not we could have collected the information by fair and lawful means. If so, we will treat the information in the same manner we treat all solicited personal information.

If personal information is unsolicited, and we determine that we could not have collected it by lawful means, we will destroy or de-identify the information.

## **14. Marketing**

We may use your personal information, 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 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 your local branch, by calling (02) 4941 3888 during business hours or by ‘unsubscribe’ from our email marketing messages, which always include an unsubscribe option.

To help us reach the right people with our credit 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.

## **15. Changes to the Privacy Policy**

We regularly review all our policies to ensure compliance with changing law, market practices and technology.

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. The Privacy Policy is available on our website.

## 16. Questions and complaints

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

You can raise your concerns or complaint through any of our branches, by phone on (02) 4941 3888 during working hours or in writing.

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 Complaints Handling Committee will investigate further and respond to you.

If you remain dissatisfied, you can contact an external body that deals with privacy complaints. These are; the Financial Ombudsman Scheme, which is our external dispute resolution scheme or the Office of the Australian Information Commissioner. 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.

Financial Ombudsman Service  
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 Commissioner  
Post: GPO Box 5218 Sydney NSW 2001  
Telephone: 1300 363 992  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## 17. Privacy Officer

Our Privacy Officer's contact details are:

Post: PO Box 851 Newcastle NSW 2300  
Phone: 02 4941 3888  
Email: [privacyofficer@hunterunited.com.au](mailto:privacyofficer@hunterunited.com.au)

## 18. 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.