

As at 26 October 2021

Police Credit Union Ltd ACN 087 651 205 ('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 as a credit provider and by the Privacy (Credit Reporting) Code 2014 (**CR Code**).

This Privacy Policy outlines how we deal with your personal information (including credit-related information), as well as our legal obligations and your rights in relation 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 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 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 the individual.

"Credit eligibility information" about an individual means credit reporting information about the individual that has been obtained from a credit reporting body and personal information that has been derived from such information, that is about an individual's credit worthiness.

"Credit information" about an individual means personal information that is:

- identification information about the individual, like their name, date of birth, sex, address and driver's licence number (if applicable), that we may use to identify that individual.
- consumer credit liability information about the individual including information about an individual's current or terminated consumer credit accounts
- repayment history information about the individual
- certain information about credit applications the person is associated with
- default information about certain consumer credit payments overdue for at least 60 days and for which collection action has started
- payment information about payments that were previously notified to a credit reporting body as overdue but 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 the individual has obtained or applied for
- personal insolvency information about the individual on the National Personal Insolvency Index
- publicly available information about the individual's credit worthiness, and
- an opinion of a credit provider that the 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 you.

"Credit-related personal information" includes credit information and credit eligibility information.

2. Personal information we collect

The kinds of personal information we collect about you varies depending on the nature of our dealings with you. For example, we collect personal information about you when you apply for or use our products or services, speak to us on the phone, electronically or in our branches, engage with us in relation to promotions or competitions we are running, use our electronic platforms (such as our website, internet banking and mobile apps), or apply for employment with us or work for us as a contractor.

Wherever possible, we will collect personal information (including credit information) directly from you. The personal information (including credit information) we collect about you if we provide you with credit or other banking and financial services will generally come from what you provide in your application for the relevant products or services and supporting documentation and includes:

- 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 liabilities (including any other credit arrangements)
- your employment or work details
- your tax residency details and taxpayer identification number (including tax file number), and
- your reasons for applying for a product or service.

When you apply to us for credit, we also collect personal information (including credit-related personal information) about you from third parties, such as:

- credit reporting information from a credit reporting body
- information about your existing liabilities from other financial institutions and credit providers
- your employment or business details with your employer or accountant
- information about your tenancy, such as from your landlord or agent (if you are renting), and
- information from any referees that you provide.

We may also collect personal information about you when you use our electronic platforms including our website, internet banking or mobile apps (see 'Website' below) and we also create personal information about you through our internal processes, like considering application you submit to us or processing transactions on your account.

Due to the nature of our business, it is generally not possible for us to provide products or services to you anonymously or by using a pseudonym, or without complete and accurate information.

3. Purposes for which we collect, hold, use and disclose personal information

We collect, hold, use and disclose your personal information (including credit-related information) for the purposes of:

- verifying who you are (such as when you apply for or open a product or communicate with us)

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- assessing and processing an application from you for the products and services we offer
- providing and managing products and services we provide to you
- communicating with you, including assisting you with your queries, concerns and complaints;
- marketing products and services to you (unless you have requested not to receive direct marketing communications from us – see ‘Marketing’ below)
- complying with our legal and regulatory obligations, including anti-money laundering and counter-terrorism financing requirements and obligations we owe under industry codes of practice; and
- managing and performing our necessary business functions, including:
 - establishing and providing our systems and processes to provide our products and services to you
 - executing your instructions
 - charging and billing
 - maintaining and developing our business systems and infrastructure
 - research and development
 - collecting overdue payments due under our credit products; and
 - managing our rights and obligations regarding external payment systems, and
- other uses required or authorised by law.

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. Who we disclose personal information to

We may disclose your personal information (including credit-related information) to other organisations, for the purposes set out above, including to:

- our 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

- guarantors who have provided a guarantee in relation to credit we have provided or propose to provide to you
- lenders’ mortgage insurers, where relevant to credit we have provided
- 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
- 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 disclose personal information to overseas recipients only where the information is collected using the member communication platform, ‘LivePerson’ or for the purposes of complying with the Foreign Account Tax Compliance Act (which applies in relation to some customers with US connections). The countries where recipients of such information are likely to be based are the United States of America and United Kingdom. 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.

We may also disclose your personal 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 (including where you have consented to an accredited data recipient collecting some of your personal information and us disclosing it to that accredited data recipient under the Consumer Data Right – for more information see our Consumer Data Right Policy which is available on our website and on request), 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

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 sensitive information without your consent, we will obtain your consent. However, if the information relates directly to your ability to

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meet financial obligations that you owe to us, you are treated as having consented to its collection.

6. Refusal of Credit Applications

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 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.

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.

7. 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.

Your personal information may be held by us in paper or electronic form. Some of your personal information may be held by a third party data storage provider. 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, one-time passwords, personal identification numbers, and tokens and other devices 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 pass code security requirements of 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.

When 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.

8. Website

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 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.

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 may 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 (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.

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 or purposes for which it was provided.

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.

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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.

Google

We use the Google Analytics cookie, Google Ads Conversion tracker, Google Analytics Advertising Features and other Google services that place cookies on a browser across our website. These cookies help us increase our website's effectiveness for our visitors. These cookies are set and read by Google. We use data from Google Analytics Demographics, Interest Reporting and third party audience data to help us understand how people find and use our site. To opt out of Google tracking, please visit this page.

<http://www.google.com/policies/technologies/ads/>

We use Google Ads remarketing to market our sites across the web. We place a cookie on a browser, and then a third party (Google) reads these cookies and may serve an ad on a third party site. You may opt out of this ad serving on Google's opt out page which is linked on this page.

<http://www.google.com/policies/technologies/ads/>

Our cookies do not collect personal information. We also use other tracking cookies from other online advertising publishers. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

9. Access

You may request access to the personal 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. 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 our Privacy Officer if you would like to challenge our decision to refuse access.

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

Under the Consumer Data Right you may also access some of the personal information that we hold about you if we provide you with products and/or services. Our Consumer Data Right Policy is available on our website or on request and explains what personal information you can access and how to access it.

10. Accuracy and Correction

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 this information by contacting our Privacy Officer whose details are in paragraph 14 of this Privacy Policy. For requests to correct information we have disclosed to an accredited person under the Consumer Data Right, please see our Consumer Data Right Policy which is available on our website or on request.

11. Marketing

Where we are permitted to do so by law, 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 our Privacy Officer whose details are in paragraph 14 of this Privacy Policy or via secure messaging which is available via our Online Banking or Police Credit Union Banking App.

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

12. Changes to the 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. Questions and Complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information (including credit-related information) including a potential breach of the Privacy Act, the Australian Privacy Principles or the CR Code, please contact our Privacy Officer whose details are in paragraph 14 of this Privacy Policy. 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, 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 our Dispute Resolution 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 Australian Financial Complaints Authority (AFCA) which is our external dispute resolution scheme, and 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.

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Australian Financial Complaints Authority

Mail	Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001
Telephone	1800 931 678 (free call) 9am-5pm AEST
Email	info@afca.org.au
Website	www.afca.org.au

Office of the Australian Information Commissioner

Mail	GPO Box 5218, Sydney NSW 2001
Telephone	1300 363 992
Website	www.oaic.gov.au

14. Privacy Officer

Our Privacy Officer's contact details are:

Mail	Police Credit Union Ltd, 17-23 Carrington Street, Adelaide SA 5000 PO Box 6074, Halifax Street, Adelaide SA 5000
Telephone	1300 131 844
Email	privacyofficer@policecu.com.au