



# Privacy Policy

Effective 1 January 2018

People's Choice Credit Union, a trading name of Australian Central Credit Union Ltd ABN 11 087 651 125, acts under its own Australian Financial Services Licence 244310 and Australian Credit Licence 244310.

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# People's Choice Credit Union

## Privacy Policy

People's Choice Credit Union, a trading name of Australian Central Credit Union Ltd (ACN 087 651125) (we, us, our) is bound by the Australian Privacy Principles under the Privacy Act (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 personal information (including credit-related information) about individuals (you, your), 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 Privacy Policy, the provisions of that agreement will prevail to the extent of any difference.

### 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 you to the extent that you are identified by, or can reasonably be identified from, the information.

**Credit eligibility information** means information that has been obtained from a credit reporting body, or that has been derived from that information, and is about your credit worthiness.

**Credit information** means personal information that, in general, relates to your credit history (refer to section 13. Glossary - for a more detailed explanation of this term).

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

### 2. How will People's Choice Credit Union collect, use and disclose my personal information?

#### (a) Collection

We will primarily collect personal information about you (including credit information) directly from you or via a method authorised by you. This information will generally come from what you provide in your application for one of 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 request our 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 status and related government issued tax 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 to collect by law.

You may decide that you do not wish to provide certain information to us. We will outline the consequences of you not providing such information, although on most occasions it will mean that we will be unable to provide the product or service you have requested.

In some circumstances, we may collect personal information (including credit-related information) about you from third parties. For example, if you have applied for a product or service, we may collect personal 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.

We may also collect personal information about you in the course of providing products or services to our members. For example, we may collect personal information about you in the course of processing payments to or from our member's accounts, if the personal information has been included in the payment details by the person that has initiated the payment.

## **(b) Use**

Where we provide products and services to you, we may use your personal information (including credit-related information) for the purpose of providing those products and services and managing our business. This may include:

- assessing and processing your application for the products and services we offer;
- introducing you to products and services we facilitate on behalf of third parties;
- to provide you with additional information in relation to existing services or products you already receive from us;
- to update contact details on any database held by us, or for providing services to you;
- to update the records of all other accounts or products you have with us;
- to inform you about products and services available (refer to section 9. Marketing - for further information);
- to allow you to obtain the unique benefits that are available resulting from membership of the Credit Union including member newsletters and member offers negotiated by us on your behalf;
- to enhance the delivery of products and services we provide you (including conducting research);
- charging, billing and recovering overdue payments;
- maintaining and developing our business systems.

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, or a purpose requested by you and to which you have consented.

Where we have collected personal information about you in relation to products and services we provide to someone other than you, we may use that personal information for the use for which we collected it.

## **(c) Disclosure**

We may disclose your personal information (including credit-related information) to other organisations including our external service providers and contractors, credit reporting bodies and other financial institutions. For a more

complete list of the organisations to whom we may disclose your personal information please refer to the definition of Permitted Recipients in section 13 - Glossary.

If we receive your personal information in the course of processing payments to or from our member accounts as part of the payment information, we may disclose that information to our member or the third party payer/payee or their financial institution as part of the processing of that payment.

We may disclose your personal information overseas, including credit information and credit eligibility information. 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 currently share limited personal information with organisations that are located in Canada and the United States of America.

### **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 your 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 express consent (except where your consent can reasonably be implied from the 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 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. What if my information is not accurate, up-to-date or complete?**

We take reasonable steps to make sure that your personal information (including credit-related information) that we collect, 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 National Contact Centre on 13 11 82 or advise any of our branches.

## **6. Keeping your information secure**

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 eligibility 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 permanently de-identified.

## **7. Can I get access to my personal information held by People's Choice Credit Union?**

You may request access to the personal information (including credit-related information) that we hold about you at any time. If the request for information relates to information that is readily accessible to us we will provide it to you immediately.

For more complex requests an 'Access to Information Form' will need to be completed in order for us to process your request. 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 Fees and Charges brochure for full details of the costs involved in accessing your personal information.

## **8. Can People's Choice Credit Union deny access to information?**

Only in limited circumstances can we deny you access to your 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.

## **9. 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 member, and even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes, such as mailing houses and internet service providers.

From time to time we may phone you for marketing purposes or send you marketing material. We will consider that you consent to this unless you opt out of receiving marketing material from us. At any time you may advise us if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email, phone, sms, or mail. And you may also be able to block online advertising by adjusting your internet browser settings. Please keep in mind that we are required to send some information by law. If you don't want us to send you marketing communications you can update your marketing contact preferences at any time in Internet Banking under the Settings menu, by calling our National Contact Centre on 13 11 82 or by visiting any branch.

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 will appear on their website.

## **10. Website**

This section explains how we handle personal information and credit information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us on 13 11 82 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 and your credit 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 Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information or credit information, you will need to obtain a copy of their privacy policy.

**11. 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.

## **12. Privacy questions and complaints**

If you have any questions or concerns about your privacy, confidentiality or access information, contact us on 13 11 82, drop in to your nearest branch or visit [peopleschoice.com.au](http://peopleschoice.com.au). 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 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 Service Quality Department 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 Financial Ombudsman Service 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 - FOS Australia  
Post: GPO Box 3, Melbourne VIC 3001  
Telephone: 1800 367 287 Website: [www.fos.org.au](http://www.fos.org.au)

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

Australian Prudential Regulation Authority  
Post: GPO Box 9836, Sydney NSW 2001  
Telephone: 1300 55 88 49 Website: [www.apra.gov.au](http://www.apra.gov.au)

If you would like further information about privacy laws, visit the Office of the Australian Information Commissioner's Website: [oaic.gov.au](http://oaic.gov.au)

## **13. Glossary**

Credit Information is personal information that includes the following:

- information about you, like your name and address, that we may use to identify you;
- information about your current or terminated consumer credit accounts and, your 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 you 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 you 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 you;
- information about court judgments which relate to credit that you have obtained or applied for;
- information about you on the National Personal Insolvency Index;
- publicly available information about your credit worthiness, and
- an opinion of a credit provider that you have committed a serious credit infringement of credit provided by that credit provider.

Permitted Recipients means:

- 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;
- third party investment platforms, where financial planning 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 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, accountant, financial advisor or attorney, as authorised by you;
- if required or authorised by law, to government and regulatory authorities, or
- any person, company, body or authority that you have requested or consented to receive your personal information.

## **14. 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.







# How to contact us

**Call** 13 11 82

**Fax** 1300 365 775

**Visit** [peopleschoicecu.com.au](http://peopleschoicecu.com.au)

**Post to** People's Choice Credit Union

GPO Box 1942, Adelaide SA 5001

**Drop in** to a branch

Connect  
with us.



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