

POLICE ASSOCIATION CREDIT CO-OPERATIVE LIMITED

ABN 33 087 651 661

PRIVACY POLICY

We, Police Association Credit Co-operative Limited (*Police Credit*), recognise the importance of your privacy, and are committed to protecting personal and financial information about you that we hold. This Privacy Policy describes how we manage your personal and financial information and safeguard your privacy.

1. REGULATORY OBLIGATIONS

Police Credit will comply with all applicable laws relating to the retention of your personal and financial information.

We will treat your personal and financial information as private and confidential and will not disclose that information to any other organisation unless:

- We are required to by law (for example, under anti-money laundering laws)
- There is a duty to the public to disclose the information
- Our interests require disclosure (for example, to prevent fraud)
- You ask us to disclose the information, or
- We have your permission to do so (for example, to external services providers when providing our products and services to you).

NATIONAL PRIVACY PRINCIPLES

Most private sector organisations in Australia must by law comply with the Privacy Act 1988 and the National Privacy Principles ("NPPs"). The NPPs strengthen protection of your privacy. We will comply with the Privacy Act and the NPPs with respect to credit reporting and the collection, storage, use and disclosure of your personal and financial information.

OUR CODE OF PRACTICE

Police Credit warrants that it will comply with the provisions of any industry Code of Practice if Police Credit has agreed to be bound by the industry code of practice.

Police Credit will make available to any member or customer a copy of our industry Code of Practice.

2. COLLECTING PERSONAL AND FINANCIAL INFORMATION ABOUT YOU

We hold only those kinds of personal and financial information that are necessary to assist us to perform our functions. This in turn depends upon the type of product or service you request from us. It may include:

- 2.1 Information you give us when you apply for or request a product or service from us. The information will include your name, residential address, date and place of birth, occupation, country of residency and contact details. If you fail to give us the information we ask for, we may be unable to process your request for a product or service.
- 2.2 Financial information about you, such as your financial position. We will only hold information obtained from credit checks if you have authorised us to carry out those checks.
- 2.3 Communications between you and us.
- 2.4 Transactional information about a product you have or have had with us.

We may also collect some information about you when you use our website www.policecredit.com.au ("the website"):

- when you visit the website, as most websites do, we track usage patterns on an anonymous and aggregate basis. Your identity cannot reasonably be ascertained from this information. Each time you visit the website, a web server records your visit, and information that includes your internet provider's address, the date and time of your visit, the pages accessed and documents downloaded and any search items entered.
- if you visit the website to send us an email we will record the information you give us, including your email address.

If you visit pceasynet to open a savings account or pc.easyloans to send us an application for credit, we will record the information you give us to process your application.

Thus, your use of the facilities and information available on the website will determine the type and amount of personal information we collect about you.

3. USING AND DISCLOSING YOUR PERSONAL AND FINANCIAL INFORMATION

- 3.1 We respect your privacy. Any personal and financial information we collect about you will be used by us to:
 - (a) provide you with the products or services you have requested, or
 - (b) assess an application by you for products or services we may provide and if that application is approved, to provide them to you, or
 - (c) to provide you with information about other products and services offered or distributed by us. However we will only do so where you have not opted-out of receiving marketing materials, or
 - (d) to assist us in developing and testing of new products and services.

We do not use external identifiers, such as tax file numbers or Medicare numbers, to assist us in the management of personal information.

- 3.2 We store your personal and financial information with a strong emphasis on its security and the protection of your privacy and will take reasonable steps to protect your information from misuse or loss, and from unauthorised access, modification or disclosure. In considering the security of your personal and financial information, we have taken into account:
 - (a) Physical security:
 - (i) All files containing personal and financial information are secured after hours and, in some cases such as any tax file numbers or sensitive information held, during business hours when not in use. Police Credit encourages its staff to maintain a clean desk policy.
 - (ii) All files containing personal and financial information are accessible only by staff requiring them for the completion of specific duties.
 - (iii) All hard copies of identification items such as passports and drivers licences are secured in locked cabinets after hours and during

business hours are accessible only by staff requiring them for the completion of specific duties.

- (iv) Drafts, spare copies and extra materials generated in the handling of files containing personal and financial information are destroyed by means of a secure destruction service.
 - (v) Personal and financial information that is no longer required is permanently de-identified or destroyed by means of a secure destruction service.
 - (vi) Information about closed accounts is held for seven years at a secure off site facility and at the end of the seven years period the information is destroyed by means of a secure destruction service.
- (b) Computer and network security:
- (i) Access to the computer network is by user identification and password only. Passwords are changed regularly. The system administrator can identify all users by their user identification.
 - (ii) The system administrator regularly reviews computer logs for security breaches and reports any breaches to the relevant manager.
 - (iii) Files are regularly backed up and saved at a separate and secure site.
 - (iv) Network security includes firewall and virus protection and network intrusion detection systems.
- (c) Communications security:
- (i) No personal or financial information is provided at branches, over the telephone or by facsimile until the identity of the applicant is verified.
 - (ii) Access to telephone banking is password protected.
 - (iii) Security for internet banking is provided by use of 128 bit encryption of data for transmission, secure socket layers protocol and password anonymity.
- (d) Personnel security:
- (i) Hard file and computer copies of unsuccessful applications for employment are destroyed by means of a secure destruction service. Appropriate and lawful enquiries are made before an offer of employment is made to any person.
 - (ii) Access to your personal and financial information is given to staff strictly on the basis of their need to have access to the material in order to fulfil their function within the credit union.
- 3.3 In order to provide you with information about other products and services offered or distributed by us we may disclose your personal and/or financial information to organisations to whom we contract out functions *(eg. IT services; mailing houses, archiving services etc)*.
- 3.4 We contract out some of our functions, as mentioned above, to external service providers. We may disclose your personal and/or financial information to them so that they can provide the services we have contracted out to them.
- 3.5 We contract or outsource all or part of our information technology services including data storage and processing to external service providers. We may disclose to these external service providers your personal and/or financial information so they can provide the services we have contracted out to them.
- 3.6 Where we use software developed by external parties to store and process electronic data, these external parties may have access to your personal and/or financial information so they can provide/maintain the services we have contracted out to them.

- 3.7 In developing or improving products and services Police Credit may seek guidance or assistance from an external party to whom we may be required to disclose your personal and/or financial information in order for that party to carry out a function on our behalf.
- 3.8 Where possible, all our service providers are subject to the NPPs or to contractual arrangements imposing substantially similar obligations. Any external service party that we engage to provide information technology services will be subject to a legally binding contract that includes non-disclosure, Privacy Act and confidentiality obligations.
- 3.9 In collecting your personal and financial information to meet international standards and to help protect business from being misused for money laundering and terrorism financing, Police Credit may at various times ask you to verify the continuing accuracy of personal and/or financial information you have previously supplied. We may also take steps to verify the personal and financial information we have collected with the authorities or organisations that have issued the information or with the person/s who certified any copies of those documents.

4. ACCESS TO YOUR PERSONAL AND FINANCIAL INFORMATION

- 4.1 In most cases, you can gain access to personal and financial information we hold about you. We will handle requests for access to your personal and financial information in accordance with the NPPs. All requests for access to your personal and financial information will be handled by our Privacy Officer, who can be contacted in writing at the postal and email addresses set out in item 5 below.
- 4.2 We will deal with all requests for access to personal and financial information as quickly as possible. In any event, we will make an initial response to your request within 30 days. Requests for large amounts of information, or for information not currently in use, may require some time before a full response can be given.
- 4.3 In some circumstances under the NPPs we may refuse to give you access to personal and financial information we hold about you. These are circumstances where giving you access would:
- (a) pose a serious and imminent threat to the life or health of any individual;
 - (b) have an unreasonable effect upon the privacy of other individuals;
 - (c) give you access to material which would not be accessible by the process of discovery in existing or anticipated legal proceedings between you and us;
 - (d) reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
 - (e) be unlawful;
 - (f) be likely to prejudice an investigation of possible unlawful activity, or
 - (g) be likely to prejudice:
 - (i) the prevention, detection, investigation, prosecution or punishment of criminal offences, or certain other breaches of law;
 - (ii) the enforcement of laws relating to the confiscation of the proceeds of crime;
 - (iii) the protection of the public revenue;
 - (iv) the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct, or
 - (v) the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders;
- by or on behalf of an enforcement body.

We may also refuse access if:

- we consider the request for access is frivolous or vexatious;

- we are required or authorised by or under law to do so, or
- an enforcement body performing a lawful security function asks us not to do so, on the basis that to do so would be likely to cause damage to the security of Australia.

If we refuse to give you access to the personal and financial information you request, we will under the NPPs provide you with reasons for our refusal.

- 4.4 We wish to ensure that your personal and financial information is accurate, complete and up to date. Generally, when you request us to do so, we will promptly amend any personal and financial information about you that is inaccurate, incomplete or out of date. If we disagree with you about any of these matters, and if you request us to do so, we will take reasonable steps to associate a statement to the effect that you claim the information to be inaccurate, incomplete or out of date with your personal and/or financial information.
- 4.5 There will be no charge for lodging a request for access to personal and financial information. However, we may charge you for providing access. Any charges will not be excessive. A schedule of current charges is available upon request at all branches and is published on our website.

5. CONTACTING US FOR FURTHER INFORMATION

Police Credit will make a copy of our Privacy Policy available to you on request and will publish it on our web site www.policecredit.com.au. We will also tell you about the Policy if you ask us.

You can get more information about the way we manage the personal and financial information about you we hold by contacting us at the telephone number, postal or email addresses set out below.

If you are concerned that we may have breached your privacy and wish to make a complaint, please contact us at the telephone number, postal or email addresses set out below.

Contact details

- For access to your personal and/or financial information or to request a change to personal and financial information held telephone Member Response on 13 63 73. Alternatively you may write to Member Response at PO Box 669 Carlton South Vic 3053 or email us at carlton@policecredit.com.au.
- To receive further information about the way we manage personal and financial information telephone Member Response on 13 63 73, write to the Privacy Officer at PO Box 669 Carlton South Vic 3053 or email us at carlton@policecredit.com.au.
- To complain about a breach of privacy telephone Member Response on 13 63 73. Alternatively you may write to the Privacy Officer at PO Box 669 Carlton South Vic 3053 or via email at carlton@policecredit.com.au.

6. CHANGES TO OUR PRIVACY POLICY

From time to time it may be necessary for us to review and revise our privacy policy. We reserve the right to change our privacy policy at any time. If we do change this privacy policy we will post amended versions in all our branches and post an updated version on our website.

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