

## **PRIVACY POLICY**

**The Community Mutual Group, a trading name of New England Credit Union Ltd, ABN 21 087 650 360 AFSL 241167**

### **Our Commitment to Your Privacy**

At The Community Mutual Group, the protection of members' privacy and the maintenance of members' personal information is considered to be of the utmost importance and we take very seriously the ongoing trust that members place in us to protect their information.

As part of our business we are committed to providing a number of services to our members, which include financial services. To provide these services, it is necessary for us to collect, store and use your personal information. In handling such personal information, The Community Mutual Group is bound and committed to complying with the Privacy Act 1998, the National Privacy Principles and the Mutual Banking Code of Practice.

We have a general duty to keep confidential all personal information we hold about members, including their names, addresses, financial data, and details of transactions on members' accounts. We will only deal with your personal information as set out in this policy.

### **Collection of Personal Information**

We collect most personal information about members directly from the members themselves. For example, we may collect personal information when you apply for membership, complete an application form for one of our many products and services, deal with us over the telephone, send us a letter, visit our web site, or when you contact us in person.

The type of information we collect will include your name and may include:

- contact details;
- tax file number;
- date of birth;
- income and financial details;
- employment details;
- credit record and transaction history.
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There may be occasions when we need to obtain personal information about a member from a third party – an example would be collecting personal information from a credit reporting agency or insurer if a member applies for a loan, credit facility or insurance.

We do not generally collect information that is 'sensitive personal information' as defined by the Privacy Act 1988 (Cth). However, we may on occasion collect information relating to your health. For example, if a member decides to take out private health cover via The Community Mutual Group, we may need to collect health information in our capacity as agent for a health insurer. Such information will only be collected from you and will only be used for the purpose for which it was collected. We do not disclose sensitive personal information to third parties without your permission or instruction. We will use this information for the purposes that you have provided it.

Where you provide information in an application for membership, we will use this information for our register of members and shareholders or the provision and offer of membership services. Where you provide information in an application for a financial product or service, we will use this information to create and maintain a financial service relationship.

If you cannot provide us with the information we require to provide and maintain these services, we may be unable to accept or continue your membership, or to provide you with financial services.

### **Use and Disclosure**

Personal information is treated as confidential within The Community Mutual Group and is used by us for the purpose for which it was collected or for a related purpose. Related purposes for providing members general advice may include:

- our own market analysis and product development;
- internal accounting and administration;
- regulatory reporting and compliance;
- informing you about new products or services; and
- protecting members and The Community Mutual Group from error and fraud.

Sometimes we may need to give some personal information about members to other organisations that provide services that assist us in supplying to members, or in administering the products and services members require, or assist us in giving members the information that they are entitled to as members. Such organisations include:

- related entities;
- insurers;
- solicitors and legal advisors;
- accountants and auditors;
- printers and mailing services;
- conveyancers;
- valuers;
- third party contractors;
- Land Titles Office & Office of State Revenue;
- CUSCAL Ltd and its subsidiaries;
- Australian Prudential Regulatory Authority (APRA);
- Australian Securities & Investment Commission (ASIC);
- Austrac;
- Australian Taxation Office (ATO), and government agencies, which regulate our products and services.

These organisations may use the information to the extent necessary to provide the services we require.

### **Confidentiality**

We have a duty to keep confidential all personal information we hold about you, including:

- your name, address and financial information;
- the balance in your account; and
- transactions on your account.

Whilst we abide by our duty of confidentiality, we may disclose members' personal information if that disclosure is:

- required to comply with our legal obligations. This includes disclosure to various government departments and agencies such as the ATO, disclosure to the courts under subpoena, and disclosure to our auditors, APRA, and Austrac.
- in the public interest (e.g. to protect our interests or where we have a duty to the public to disclose, or where it is necessary in proceedings before a court or tribunal) and where a crime or fraud is committed or is suspected, disclosure may be justified.

### **Disclosure to Third Parties**

Except where required by law, we only disclose personal information to third parties with your express or implied consent. We will not sell any personal information about members to any other organisation, and we will not disclose names and addresses to third parties for the purpose of allowing them to direct market their products and services to members of The Community Mutual Group.

### **Your Consent**

Your consent to us may be express or implied. We obtain your express consent by you in writing to notify us of your consent or by signing to acknowledge a statement of consent. Your implied consent includes your consent, by taking up membership, to allow us to disclose your identifying information to our service providers to enable us to operate and provide services and products to you. Confidentiality of the information will at all times be maintained.

If a member does not consent to certain uses of personal information, then, unfortunately, we may not be able to provide the member with some of our products and/or services.

### **Marketing Information and Your Privacy**

We may provide you with information from time to time about new products and services available to you from The Community Mutual Group, or other businesses with which we have a relationship. We may also use a member's personal information to invite them to participate in research and surveys that will assist The Community Mutual Group in offering products and services that suit our members' financial needs. If you do not wish to receive this information, you may notify us by contacting our Head of Marketing on (02) 6776 0444 and we will take steps to ensure that you do not receive such material.

### **Tax File Numbers, Medicare Numbers and Pension Numbers**

We use and disclose these numbers only for the purposes required by law.

### **Keeping an Accurate, Complete and Up-To-Date Account of Members Personal Information**

We rely on the accuracy of the information you provide to us. If you believe or know that information we hold about you is incorrect, out of date or incomplete, please contact us on (02) 6776 0444 and we will make all reasonable efforts to correct the information.

### **Security of Your Personal Information**

We take all reasonable precautions to protect your personal information from loss, unauthorised access, modification and unauthorised disclosure. Personal information about

your accounts and membership is only accessible by you and by those who are authorised to access it. Only authorised employees have access to members' personal information, and access is only for approved purposes. Your personal information can only be amended and deleted by authorised means.

Members' personal information may be stored in hard copy documents, as electronic data, or in The Community Mutual Group's software or system. Hard copy documents are secured on our premises and at archive sites by locks and security systems. Wherever practicable, hard copy documents are returned to you and not kept on our premises. Electronic data stored on our computers is protected by computer and network security products, including firewalls, encryption, virus software, as well as user identities and passwords.

The use of the Internet allows The Community Mutual Group to provide banking and financial services that members can access when it is convenient for them from wherever they have Internet access. We appreciate that members may have concerns about the confidentiality and security of the personal information that we may collect about them online. In recognition of these possible concerns, we have implemented systems to ensure that our online contact with members is secure and confidential. The Community Mutual Group's web site does not use cookies to identify visitors to the site.

Although our website uses the highest level of technology to ensure maximum security, no data transmission over the Internet can be guaranteed to be totally secure. You should assess these potential risks when deciding whether to use our Internet banking services. The Community Mutual Group does use Verisign secured socket layers (SSL) 128 bit technology to encrypt web access and other secure information where transcribed across the web. The Verisign system uses a public and private key structure to encrypt and decrypt information transmitted.

Whenever using our website, you should ensure that you log out when you leave the computer to prevent unauthorised activity on your account and access to your information.

### **Members Access to Personal Information**

Under the Privacy Act 1998 you have the right to access personal information we hold about you. If you believe that any of your information we hold is incorrect or inaccurate, you should advise us and, where possible, we will make the corrections.

We would ask that any such request is stated as clearly as possible and adequately identifies the information you are seeking. We will respond to members requests as soon as is reasonably practicable, taking into account the age, nature and amount of information requested.

The Community Mutual Group may recover from a member its reasonable costs of supplying the member with access to the member's personal information. If we deny your request for access, we will provide you with reasons for that denial.

### **Children's Privacy**

The safety of children is very important to us. We ask that children under the age of 18 have a parent or guardian verify their membership application. Whilst The Community Mutual

Group will make every reasonable effort to ensure that children's privacy and other rights are not compromised, it is the responsibility of parents to monitor their children's Internet usage.

**Changes to Our Privacy Policy**

This information relates to our current privacy policy. We may vary this policy and changes to our policy will be published on our website, and in our branches from time to time.

**How to Make a Complaint or Enquiry**

You can contact our Human Resources Manager on (02) 6776 0444 to register a complaint or concern or to answer your questions relating to this Privacy Policy.