

Privacy Policy

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1. Introduction

Family First Credit Union Limited (FFCU) is committed to complying with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APP'S). The staff and directors of the Credit Union are responsible for ensuring adherence to this Privacy Policy and protecting member's privacy and confidentiality.

Personal information means information or an opinion (including when in a database), whether true or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.

- i. This policy applies to information collected on or after 12 March 2014 and explains how we collect, use, disclose, and store your personal information. We will only use or disclose your personal information as set out in this policy, and for a purpose you would reasonably expect, or for a purpose required or authorised by law, or for a purpose otherwise disclosed to, or authorised by you.
- ii. In relation to personal information collected prior to 12 March 2014 and to which the National Privacy Principles apply, such information is hereby deemed to be compliant with these principles at 12 March 2014

In order to ensure the Credit Union complies with the legislation the following practices have been instituted

- All staff members and Directors are required to sign a confidentiality agreement annually which will also include acknowledgement of the new laws in relation to anti-competitive price signalling and information disclosures under the regulation of the ACCC ^{POL026 1}
- All employees shall be informed of this policy and relevant procedures through training that will be provided on commencement of employment and at regular intervals thereafter ^{POL026 2}
- The appointed Privacy Officer shall ensure compliance with this Privacy Policy on an annual basis. The results of any serious matters of non-compliance shall be communicated back to the Board. ^{POL026 3}
- This document is available on request to all member/s.
- The Privacy Notice is also available to member/s and prospective members.

2. Review and Distribution

This Policy will be subject to review and amendment, as necessary, by the board on an annual basis in accordance with the established Policy Review Schedule. Additional review may be necessitated by changes in legislation and or significant changes in operating conditions. ^{POL026 4}

Distribution of this policy is as follows:

- Members
- Directors
- Management
- Staff
- FFCU Internal and External Auditors
- APRA upon request

The credit union's existing products and processes will be reviewed annually to ensure compliance with the NPP'S and new products or procedures will be checked by the appointed Privacy Officer to ensure compliance with the APP'S. ^{POL026 5}

3. Privacy Officer

FFCU is required to designate a person as the 'Privacy Officer' at management level.

FFCU designates the Chief Executive Officer as its Privacy Officer. The Privacy Officer is qualified by experience; knowledge and training.

The Privacy Officer is the nominated person who will support and coordinate senior management focus on managing FFCUs privacy risk.

4. Privacy Training

All Credit Union staff will undertake initial training in relation to the Privacy Act and will be required to complete additional training on a regular basis.

Records of the training completed shall be maintained in the training register

Privacy Policy

Family First Credit Union Limited (ABN 39 087 650 057) ('FFCU' '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 by credit providers; and the Credit Reporting Privacy Code.

This Privacy Policy outlines how we deal with your personal information (including credit-related information), 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 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. 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" 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 an individual's 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 information) directly from 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 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, and
- your reasons for applying for a product or service.

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. 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.

The Credit Union will collect personal information as required by the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (AML/CTF Act) and will take steps to verify the information it has collected. The personal information collected will be handled, disclosed and verified as required by the AML/CTF Act. If a member provides incomplete or inaccurate information, the Credit Union may not be able to provide the requested products and services.

3. Use

We may 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 providing our systems and processes to provide our products and services to you
- executing your instructions

- charging and billing
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- research and development
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems, or
- direct marketing.

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. Disclosure

We may disclose your personal information (including credit-related information) to other organisations, for example:

- 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
- 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, solicitor, mortgage broker, financial advisor or attorney, as authorised by you, or
- if required or authorised by law, to government and regulatory authorities.
- Financial Institutions who we have a loan sharing scheme arrangement in place.

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 will not disclose your personal information overseas, including your credit information and credit eligibility 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 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.

6. Refusal of credit application

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.

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.

We ask you to keep your passwords and personal identification numbers safe, in accordance with our suggestions.

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 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 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 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 (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 for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

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.

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.

UltraData’s My Viewpoint, the Credit Unions Internet Banking System, uses a range of security techniques to help protect your personal information. This includes the latest and strongest 128-bit SSL data encryption technology to help provide the best protection currently available for your password and account details and any other account information exchanged within the Internet and Mobile Banking facility as well as our Mobile app.

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.

10. Accuracy

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. 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.

11. 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.

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 our Privacy Officer whose details are in paragraph 14 of this Privacy Policy, or by 'unsubscribe' from our email or SMS marketing messages, which always include an unsubscribe option.

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), 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, 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 Operations Team 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 the Australian Financial Complaints Authority 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.

Australian Financial Complaints Authority

Post: GPO Box 3, Melbourne VIC 3001

Telephone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

Federal Privacy Commissioner

Office of the Australian Information Commissioner

Post: GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

14. Privacy officer

Our Privacy Officer's contact details are:

Address: Family First Credit Union Privacy Officer,
PO Box 386
Lithgow NSW 2790

Telephone: 1300 369 900

15. 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.

Australian Privacy Principles

A summary of the 13 Australian Privacy Principles (APP's) covered by the Privacy Act 1988 are as follows:

APP 1 — Open and transparent management of personal information

Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

APP 2 — Anonymity and pseudonymity

Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

APP 3 — Collection of solicited personal information

Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

APP 4 — Dealing with unsolicited personal information

Outlines how APP entities must deal with unsolicited personal information.

APP 5 — Notification of the collection of personal information

Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

APP 6 — Use or disclosure of personal information

Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

APP 7 — Direct marketing

An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

APP 8 — Cross-border disclosure of personal information

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

APP 9 — Adoption, use or disclosure of government related identifiers

Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

APP 10 — Quality of personal information

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

APP 11 — Security of personal information

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

APP 12 — Access to personal information

Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

APP 13 — Correction of personal information

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.

Addendum A – Privacy Notice

The Privacy Act allows Family First Credit Union Limited ('we', 'us', 'our') ABN 39 087 650 057 to disclose personal information about you when related to the primary purpose for which it was collected.

In connection with providing credit to you, personal information may include credit information:

- details to identify you and verify your identity, such as your name, sex, date of birth, current and 2 previous addresses, your current and last known employer, and your driver's licence number
- the fact that you have applied for credit and the amount or that we are a current credit provider to you, or that you have agreed to be a guarantor
- advice that payments previously notified as unpaid are no longer overdue
- information about your current or terminated consumer credit accounts and your repayment history
- payments overdue for at least 60 days and for which collection action has started
- in specified circumstances, that in our opinion you have committed a serious credit infringement
- the fact that credit provided to you by us has been paid or otherwise discharged, and
- other information about credit standing, worthiness, history or capacity that we can disclose under the Privacy Act, including a credit report.

Your sensitive information (eg: membership of a professional or trade association) may also be disclosed where relevant to the purposes for collecting it.

Why do we obtain information?

Before, during or after the provision of our products and services to you, we may obtain your personal information for the purpose of providing products and services to you and managing our business. When providing credit to you, this may include assessing your application for consumer or commercial credit or to be a guarantor for the applicant, assessing your credit worthiness, managing your loan or the arrangements under which your loan is funded or collected overdue payments.

If you do not provide us with the personal information that we request, we may not be able to consider your application for credit or provide other services.

Who can give or obtain information?

For the purpose of providing products and services to you and managing our business, we may give information to:

- external service providers to us, such as organisations which we use to verify your identity, payment system operators, mailing houses and research consultants
- providers of payment and card services, when you make a transaction using a payment service or a card
- insurers and re-insurers, where insurance is provided in connection with our services to you
- debt collecting agencies, if you have not repaid a loan as required
- our professional advisors, such as accountants, solicitors, auditors, and property valuers.
- state or territory authorities that give assistance to facilitate the provision of home loans to individuals
- your representative, for example, solicitor, mortgage broker, financial advisor or attorney, as authorised by you, or
- government and regulatory authorities, if required or authorised under an Australian law or a court/tribunal order.
- Financial Institutions who we have a loan sharing scheme in place

In addition, in connection with providing credit to you, we may:

- obtain a commercial and consumer credit report containing personal information about you from a credit reporting body
- obtain personal information about you from your employer and any referees that you may provide

- exchange credit information about you with each other, and
- exchange credit information about you with any credit reporting body and any other provider of credit to you named in your credit application or a credit report from a credit reporting body.

Credit Providers can mean:

- us
- our related companies
- any introducer, dealer or broker referred to in a loan application
- any agent or contractor of ours assisting in processing a loan application, and
- other entities involved that may be involved in a securitisation or loan syndication arrangement which we use to fund your loan

We will not disclose your personal information overseas.

Important information about credit reporting bodies

If you apply for or hold any kind of credit with us, we may disclose information about you to a credit reporting body. That includes disclosing that you are in default under a credit agreement or have committed a serious credit infringement, if that is the case. (Specifically, we may disclose information to or collect information from Equifax, whose privacy policy and contact details are at www.equifax.com.au).

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.

"Credit pre-screening" is a service for credit providers wishing to send direct marketing material about credit services. A credit reporting body uses information it holds to screen out individuals who do not meet criteria set by the credit provider. Credit reporting bodies must maintain a confidential list of individuals who have opted out of their information being used in pre-screening. To opt out of credit pre-screening, contact the credit reporting body, using the contact details on their websites, referred to above.

You can also ask a credit reporting body not to use or disclose your personal information for a period if you believe that you have been or are likely to be a victim of fraud, including identity fraud.

Disclosure to insurers and guarantors

Lenders' mortgage and trade insurers

In connection with providing credit to you, a lenders' mortgage insurer or a registered trade insurer may obtain credit information about you from a Credit Provider or from a credit reporting body to assess whether to provide lenders' mortgage insurance to us in relation to an application for consumer credit, or whether to provide trade insurance to us in relation to an application for commercial credit.

Guarantors

In connection with providing credit to you, we may give a guarantor, or a person who is considering becoming a guarantor, credit information about you for the purpose of enabling the guarantor to decide whether to act as guarantor or to keep informed about the guarantee.

Personal information about third parties

You represent that, if at any time you supply us with personal information about another person (for example a referee), you are authorised to do so; and you agree to inform that person who we are, how to contact us, and how to obtain our Privacy Policy, and that we will use and disclose their personal information for the purposes set out in this Notice and that they can gain access to that information by contacting us.

Security, privacy policy, and marketing preferences

Security

We take all reasonable steps to ensure that all your personal information held by us (on our website or otherwise), is protected from misuse, interference and loss, and from unauthorised access, disclosure or modification.

Privacy Policy

Our Privacy Policy provides additional information about how we handle your personal information. It sets out how you can ask for access to personal information we hold about you and seek correction of that information. It also explains how you can complain about a breach of the Privacy Act or the Credit Reporting Privacy Code, and how we will deal with your complaint. We will give you a copy of our Privacy Policy on request.

Marketing preferences

The credit providers may use, and share with each other, information about you to inform you about products and services (unless you ask us not to).

The credit providers may do so even if you are on the Do Not Call Register.

Contact Us

Privacy Officer

Our Privacy Officer's contact details are:

Family First Credit Union Privacy Officer

PO Box 386

Lithgow NSW 2790