



Family First Credit Union
trading as Family First Bank

Privacy Policy

February 2024

Privacy Policy

Family First Credit Union Limited trading as Family First Bank (ABN 39 087 650 057) ('Family First' '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 by the Privacy (Credit Reporting) Code.

This Privacy Policy (Policy) outlines how Family First deals 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 Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

This Policy also provides information about how you can access information that Family First holds about you, how you are able to have Family First correct that information and how you can lodge a complaint if you have concerns about how Family First manages your personal information.

1. Key types of information

Certain words have special meanings when used in this 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, age address and employment details, that we may use to identify that individual;
- information about an individual's current or terminated consumer credit accounts and their repayment history;
- financial hardship information;
- 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.

Family First 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 Policy.

“Credit-related information” means credit information, credit eligibility information and related information.

“Consumer Data Right Regime” means the sharing of your personal and account information in accordance with the Competition and Consumer (Consumer Data Right) Rules 2020.

2. Collection

Family First may collect personal information from you by various means, including in-person, by telephone, using video conferencing, by email, by letter and through our website, social media channels and mobile apps.

Wherever possible, Family First will collect personal information (including credit information) directly from you, which generally will come from what you provide in your application for membership and/or for one of our products or services.

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 residency details and taxpayer identification number (including tax file number), and
- your reason(s) for applying for a product or service.

Family First also may 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.

Family First may collect information from you because we are required or authorised by law, including in the following instances:

- When you open an account, Family First may collect your Australian tax file number (TFN) to determine whether you are subject to withholding tax on any interest payments you receive. If you do not provide us with your TFN, we may deduct withholding tax from your interest payments at the highest marginal rate, as set by the Australian Taxation Office. Where Family First does collect a TFN, it handles this information in accordance with the Privacy Act. Family First also may be required to ask you about your tax residency status under taxation sharing agreements that Australian Government has in place with other countries.
- When you open an account and for some products and services that Family First provides, we collect personal information as required by the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (AML/CTF Act) and take steps to verify the information collected. The personal information we collect will be handled, disclosed and verified as required by the AML/CTF Act. If an individual provides incomplete or inaccurate information, Family First may not be able to provide the requested products and services.

- When you apply for consumer credit, Family First is required, under the National Consumer Credit Protection Act 2009, to make the necessary enquiries into the financial situation and needs and objectives of individuals who apply. This is so Family First can make an informed decision about whether the individual has the capacity to afford the credit they are applying for. In making these enquiries, it is necessary that Family First provides information that identifies you, as well as information about your application, including the type and amount of credit you are applying for.

From time to time, Family First may collect information about you that is publicly available, including from websites and telephone directories.

If you apply for employment with Family First, we will collect your name and contact details and other information relevant to assessing your application, including your qualifications, employment history, education and the name and contact details of your referees.

3. Use

Family First 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
- to manage accounts and perform other administrative tasks
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems, and
- marketing, including direct marketing.

In general, Family First does not use or disclose your personal information (including credit-related information) for a purpose other than:

- a purpose set out in this 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

Family First may disclose your personal information (including credit-related information) to third parties, 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
- 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
- other financial institutions, for example, when you apply for a loan from another credit provider and you agree to us providing information
- financial institutions who we have a loan sharing scheme arrangement in place
- 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

- your current and prospective co-borrowers, guarantors or security providers
- 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
- if required or authorised by law, to statutory authorities, government departments and agencies, regulatory authorities, and to external dispute resolution services
- entities that help identify and investigate inappropriate or illegal activity, such as fraud, or
- other individuals (cardholders, joint account holders, account signatories), as authorised by you.

Family First 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.

Family First will not disclose your personal information overseas.

Family First may also disclose your personal information (including credit-related 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, 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.

The Consumer Data Right gives you the right to:

- access some of the data (including personal information) held about you by us and by other data holders ('CDR Data');
- consent to an accredited third party accessing your CDR Data held by us; and
- consent to us accessing your CDR Data held by another data holder.

We have a policy about our management of CDR Data. On request, we can provide you with an electronic or hard copy.

5. Sensitive information

Where it is necessary to do so, Family First 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, Family First 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

Family First 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, Family First 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

Family First takes 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. 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, 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 your personal information. If you do, you may breach 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 Family First no longer requires your personal information (including when we no longer are 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 Family First handles 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 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 Family First may access each time you visit our website. When you visit the secured pages of our website (i.e. 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 (i.e. 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 Family First receives 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

Family First uses 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, Family First 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

Family First’s website may contain links to third party websites. The terms of this 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.

9. Access

You may request access to the personal information (including credit-related information) that Family First holds about you at any time from our Privacy Officer whose details are in section 14 of this Policy.

We will respond to your request for access within a reasonable time. If Family First refuses 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 Family First’s 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 and Correction

Family First takes 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 Family First updates this information by contacting our Privacy Officer whose details are in paragraph 14 of this Policy.

Family First encourages you to update your personal information when changes occur to assist us with ensuring your information is current.

11. Marketing

Where we are permitted to do so by law, Family First 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 a member of Family First, 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 section 14 of this Policy, or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

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

Family First may make changes to this 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 Policy, or our handling of your personal information (including credit-related information), please contact Family First's Privacy Officer whose details are in section 14 of this 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. Family First 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 we will investigate further and respond to you.

If you still are not satisfied, you can contact external bodies that deal with privacy complaints. These are the Australian Financial Complaints Authority which is Family First's external dispute resolution scheme, or 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.

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

Office of the Australian Information Commissioner
Post: GPO Box 5288 Sydney NSW 2001
Telephone: 1300 363 992
Website: www.oaic.gov.au

14. Privacy Officer

Our Privacy Officer's contact details are:

Address: Family First Bank Privacy Officer, PO Box 386, Lithgow NSW 2790
Telephone: 1300 369 900