

# CUA Group Privacy Policy

March 2020

For more information:

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**Credit Union Australia Limited**

ABN 44 087 650 959

AFSL and Australian credit licence 238317

Registered Office: 145 Ann Street, Brisbane QLD 4000

RC00152\_REV200221

**cua**  
BANKING | INSURANCE

## **We are CUA - Credit Union Australia Limited, CUA Health Limited, CUA Management Pty Ltd and Credicorp Insurance Pty Ltd.**

We provide banking and insurance products and services to you, our members. We can't provide these products and services without collecting, using, and in certain circumstances disclosing your personal information. We're committed to being as open and honest as possible when it comes to how we deal with your personal information.

### **What personal information do we collect?**

We hold personal information on our members for many reasons. Some information is needed for legal reasons, such as our obligation to identify you, keep a record of transactions and make sure you're not taking on too much debt. Some is needed to manage risks, such as reducing fraud on your accounts. Other information is needed for account administration purposes, such as communicating with you, assessing and paying insurance claims or keeping you informed about our products and services.

Here are some examples of the types of personal information that we collect, hold and use:

- Identifiers - your name, address, contact details and date of birth
- Financial information - your income and expenses, assets and liabilities and employment status
- Family situation - passwords and secret identifiers (potentially including biometric identifiers like your fingerprint or facial recognition for logging into your account)
- Government identifiers - drivers licence, passport, Medicare and tax file numbers
- Health, lifestyle and behavioural information - such as where relevant to insurance or a loan application
- Transaction records - including where you spend your money

Importantly, we will never collect information about you unless we need it to provide our services to you. And we won't collect sensitive information, like health records, about you without your consent.

If you apply for a loan or offer to guarantee a loan we may also collect credit-related personal information about you, including from Credit Reporting Bodies.

Credit reporting bodies are allowed under the Privacy Act and the Privacy (Credit Reporting) Code to handle such information. This information includes credit information, credit reporting information, credit eligibility information, regulated information, Credit Reporting Body derived information and Credit Provider derived information. Here are some examples:

- current debts and loan history
- your repayment history, including any defaults and whether or not they've been remedied or are subject to a credit arrangement. This includes serious credit infringements
- information on whether you have been insolvent or subject to a default judgement
- names of credit providers that have made enquiries on your credit file
- publicly available court judgements and directorships

We use this information to determine whether or not you are eligible for credit, and to create an "unsuitability assessment" as required by law. Without collecting this information we can't approve loan applications. And if we refuse a loan application because of credit eligibility information we've collected from a credit reporting body we will let you know that this is the basis for declining your application. This could relate to information provided about you, a joint borrower or a guarantor.

If you apply for a loan, we will share information with the following credit reporting bodies:

#### **Equifax**

[www.equifax.com.au](http://www.equifax.com.au)  
Ph: 13 83 32

#### **Experian**

[www.experian.com.au](http://www.experian.com.au)  
Ph: 1300 783 684

#### **Illion**

[www.illion.com.au](http://www.illion.com.au)  
Ph: 13 23 33

If you think, on reasonable grounds, that you're at

risk of fraud or identify theft, you can ask these credit reporting bodies to lock down your credit file. Please get in touch with them for more information.

## How we collect information

You're our main source! You provide identification information when you join. You answer questions for us when you take out a new product. Even information we collect on transactions and claims is information we get directly from you.

We also collect information about you from other people if it's necessary for us to offer our services and it's unreasonable or impractical to collect it from you directly. We mentioned credit reports above – that's an example of collecting information about you from other people. Other people we may collect information from include:

- Joint account or policy holders
- Your referees and employer (for loan applications)
- People you authorise to represent you (such as your agents, powers of attorney, lawyers and accountants)
- Insurance brokers and our third party distributors (such as mortgage brokers)
- Credit reporting bodies, and in some circumstances, other credit providers
- Health insurance and health service providers, including firms that manage the sharing of information between health service providers and insurers (for example, the Australian Health Service Alliance Ltd – you can access their privacy policy at [www.ahsa.com.au](http://www.ahsa.com.au))
- Banking and other institutions directly, when you tell us to or when settling your transactions

Sometimes you will provide us with information about other people who aren't members of CUA. Examples include adding a signatory or attorney to your account. When you do this, you should let them know and make them aware of this privacy statement.

We may also create personal information through internal processes, such as when creating an internal credit score for a loan applicant.

We might also share information with social media organisations and data analytics service providers to gain insights into products and services that might be of value to you. One example of this type of sharing would be to match the email address you've given us with a Facebook profile, and then to use information from that profile to identify products you may be interested in. Another example may be to collect information about you from reward or loyalty program providers to identify and analyse your spending habits. Because you're the kind of person who reads privacy policies, you'll know that this kind of analysis is increasingly common and involves a decision you need to make between balancing your privacy with convenience. You can tell us not to collect and use your information in this way, but first consider the controls we've put in place to protect your information. These are explained in the following sections. Respecting your right to privacy goes to our core as a member owned institution.

We also collect information from our website, including the IP address of visitors, the pages you visit on our website and the browser used. We also use cookies to help verify your identity if you're logging into online banking, and to monitor how our website is used. As well as improving your account security, we also analyse this information to help make our site more relevant and user friendly. You can turn cookies off in your browser settings if you don't want us to do this.

If you use a calculator on our website, we might use the information you provide for research or marketing purposes. If you provide contact details in an online feedback form, we will retain a copy of the feedback, including your contact details, but won't use those details for marketing purposes without your consent.

## Why we collect information

We only collect information that is necessary to provide you with our products and services, and to maintain and administer your relationship with us. We're also required by law to collect certain information, such as under the Anti-Money Laundering and Counter-Terrorism Financing Act, the Corporations Act and the National Consumer Credit Protection Act. If you don't provide the information we ask for, there may be times when we are simply unable to provide you with our services. Importantly, every time we collect information from you we'll let you know what we're going to use it for.

Here are some examples of why we collect information:

- assessing and processing requests for our banking, insurance and health insurance products
- administering your accounts, including executing your instructions and providing you with periodic statements
- setting up payment instructions
- uses required or authorised by law
- maintaining and improving our systems and processes
- research, development and internal analysis
- assessing your credit worthiness (as a borrower or guarantor), and helping to manage your loan (including defaults)
- conducting reward and insurance programs, and running competitions
- managing our rights and obligations in the payments system, which includes processing payments to email addresses, mobile phone numbers and PayID Names under the New Payments Platform
- to provide you with product and service updates, including information on changes to product terms
- to let you know about products that we think will be relevant to you, including marketing and contacting you to discuss partially completed online applications

## How we protect your information

Protecting your privacy is important to us and we have strict controls to protect your information, whether it be in storage, in use or in transit (including electronically). This includes both physical and electronic access controls. Personal information is encrypted both 'at rest' and 'in transit', and is masked or anonymised where possible. Staff are trained on their obligations, processes are frequently reviewed and updated, and the appropriateness and effectiveness of our controls are subject to both internal and external review.

## Who we share your information with

In order to give you the best service possible, and to comply with legal obligations like those mentioned above, we need to share your information with various other people or firms. We do not share information with anyone unless there is a genuine business purpose, and we ensure all vendors have appropriate security arrangements in place to protect your information.

The types of people and businesses we may disclose your information to include:

- our staff, assignees, agents and contractors
- our service providers including those used for identity verification, software/IT support, account management (including payments), mailing material to you, member and product research and accounting, legal and audit services
- your referees, employers and tax agents
- government agencies when authorised or required by law
- courts and dispute resolution schemes
- CUA Group entities which include Credit Union Australia Limited, Credicorp Insurance Pty Ltd, CUA Management Pty Ltd and CUA Health Limited
- credit reporting bodies, including when you fail to meet your loan obligations or commit a serious credit infringement
- other credit providers (including second mortgagees)
- debt collection agencies (if you're in default on a loan)
- other organisations with your authorisation or consent
- managers and funding providers of securitisation facilities, where they have obtained an interest in your loan, or are considering doing so, and their professional advisors
- insurers and re-insurers for policies taken out through CUA (each insurer will have a publicly accessible privacy policy, available on their website or by contacting them directly)
- organisations involved in the administration of our rewards program
- your health service providers including your doctor or hospital, if you have health insurance with us

Our service providers include businesses that are either based overseas or have overseas or cloud-based data storage. Accordingly, your information may be disclosed to or stored in countries including the United Kingdom, the Netherlands, the United States of America, Singapore, India, Norway, Canada, Japan and the Philippines. For other products taken out through CUA, the product issuer can provide more information on how they protect and disclose your information.

## Keeping you informed

We will use your personal information to keep you informed about our products and services, as well as those of trusted third parties. As mentioned above, we analyse your information to help make this information as relevant as possible, and if you don't want us to contact you for these purposes you can let us know – by phone, in branch, or through our iM CUA app (where available). Any marketing material we send you electronically will include an 'unsubscribe' option which will stop you getting future marketing material.

Before conducting credit related direct marketing we may ask a credit reporting body to 'pre-screen' potential recipients against our eligibility criteria and remove members who are ineligible. In these circumstances, the credit reporting body must not use information about your existing loans or repayment history when pre-screening, and must destroy its assessment once it has provided us with a copy of eligible recipients. If you don't want credit reporting bodies using your information in this way you can let them know – their contact details are provided above.

## Changes to this policy

We can make changes to this policy at any time and the latest version will always be available online and in our branches. Because we value your trust we will always endeavour to tell you about material changes to this policy in a timely and cost-effective manner, which may include updating you by email, SMS, statement notices or our iM CUA app (where available).

## Questions and feedback

If you have any questions, concerns or complaints about this policy or our handling of your information or if you would like to access or correct information you believe is inaccurate or incomplete, please let us know at:

### Privacy Dispute Officer

GPO Box 100, Brisbane, QLD 4001  
E: [Privacydisputes@cua.com.au](mailto:Privacydisputes@cua.com.au)

Questions or feedback received will be considered by our Member Advocacy team, in consultation with the Privacy Officer, and we commit to providing you with a timely response. For more complex queries we will keep you informed of our review as it progresses. If we can't resolve a complaint to your satisfaction, you can refer it to one of the following external dispute resolution bodies:

	Australian Financial Complaints Authority	Private Health Insurance Ombudsman (PHIO)	Office of the Australian Information Commissioner
Credit Union Australia Ltd	✓	X	✓
Credicorp Insurance Pty Ltd	✓	X	✓
CUA Health Ltd	X	✓	✓

Contact details for these bodies are:

### Australian Financial Complaints Authority

GPO Box 3, Melbourne VIC 3001  
Ph: 1800 931 678  
[www.afca.org.au](http://www.afca.org.au)

### Private Health Insurance Ombudsman

Ph: 1300 737 299  
[Phio.info@ombusdman.gov.au](mailto:Phio.info@ombusdman.gov.au)

### Office of the Australian Information Commissioner

GPO Box 5218, Sydney NSW 2001  
Ph: 1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

