

RACQ Bank Privacy and Credit reporting policy

RACQ Group

The Royal Automobile Club of Queensland Limited is the owner of a group of companies, which include (but are not limited to), the following:

- RACQ Operations
- RACQ Insurance
- Club Finance Holdings
- Members Banking Group Limited trading as RACQ Bank

(collectively referred to as the 'RACQ').

RACQ collect, hold, use and disclose your personal information in a number of ways. RACQ is bound by the Privacy Act 1988 (Cth) (Act) and the Australian Privacy Principles contained within the Act.

RACQ Bank ('referred to a 'we' or 'us') is 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.

This Privacy and Credit Reporting 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 disclose any of your personal information in ways which differ to those stated in this Privacy and Credit Reporting Policy, the provisions of the RACQ Group Privacy Policy prevails to the extent of any inconsistency.

This Privacy and Credit Reporting Policy applies to current and former credit customers of RACQ Bank, as well as other relevant individuals we deal with in connection with credit that RACQ Bank provides (such as guarantors).

Key types of information

Certain words have special meanings when used in this Privacy and Credit Reporting 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.

Examples of personal information collected by us include name, date of birth, current and previous residential addresses, telephone number, email address, employer, place of work, occupation, income, assets, liabilities, credit history and other

financial and credit-related information. We may also collect driver's licence number, passport number or other identification information provided in connection with an application (including 100-point check or identification reference) for us to establish your identity and the identity of signatories to accounts.

"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 and Credit Reporting Policy.

"Credit-related information" means credit information, credit

eligibility information and related information.

“Sensitive information” means:

- information or an opinion about a person’s race, ethnic origin, political opinions, membership of political associations and trade associations, religious or philosophical beliefs, sexual orientation or practices, or criminal record, or
- health information, or
- genetic information about an individual that is not otherwise health information, or
- biometric information that is used for the purpose of automated biometric verification or biometric identification and biometric templates.

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 a customer. 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, your employer, finance brokers and mortgage insurers 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.

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
- account administration

- assessment of employment applications
- executing your instructions
- charging, billing and auditing
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- planning, product research and development
- other internal management functions and operations related to the provision or management of banking products by RACQ Bank
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems, or
- direct marketing.

We may also disclose personal information to our business associates with whom we have alliances or arrangements from time to time, for the purpose of promoting their products and services, and to any mailing houses and agents used in administering direct marketing arrangements.

We never use sensitive information or credit information for direct marketing purposes.

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 and Credit Reporting 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.

Disclosure

We may disclose your personal information (including credit-related information) in the course of our business to:

- our related companies, including the entities that form part of RACQ.
- 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, settlement agents, mailing houses and research consultants
- insurers and re-insurers, where insurance is provided in connection with our services to you
- superannuation funds, where superannuation services are provided 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, auditors and credit rating agencies
- 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
- guarantors nominated by you
- any person necessary, in our view, to carry out an instruction you give to us
- loan introducers or dealers
- your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you, or
- if required or authorised by law, to government and regulatory authorities.

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 may disclose your personal information overseas, including your credit information. The countries where we are likely to disclose your personal information, including your credit information, include India, the Netherlands, Singapore, the Philippines, the United States of America, Thailand and China. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in this Privacy and Credit Reporting Policy.

Sensitive information

Where it is necessary to do so, we may collect personal information about you that is sensitive information.

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.

Refusal of credit applications

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 either 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.

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.

Website

The RACQ Group Privacy Policy at www.racq.com.au/privacy 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, as there are other ways for you to provide us with your personal information.

Links on our website

Our website may contain links to third party websites. The terms of this Privacy and Credit Reporting 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 and Credit reporting policy.

Access

You may request access to the personal information (including credit-related information) that we hold about you at any time from the RACQ Group Privacy Officer.

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.

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.

Before correcting or providing access to personal information in response to a request, we will require your identity to be confirmed.

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 customer, 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, or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

To help us reach the right people with our credit direct marketing, we may ask a credit reporting body to "pre-screen" a list of potential recipients of our direct marketing against our eligibility criteria to remove recipients that do not meet those criteria. The credit reporting body cannot use information about your existing loans or repayment history in carrying out its pre-screening and it must destroy its pre-screening assessment once it has given us, or a contractor acting on our behalf, the list of eligible recipients. If you do not want your credit information used for pre-screening by a credit reporting body that holds credit information about you, you can opt-out by informing that credit reporting body.

Changes to the Privacy and Credit reporting policy

We may make changes to this Privacy and Credit Reporting Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Privacy and Credit Reporting Policy is available on our website.

Questions and complaints

If you have any questions, concerns or complaints about this Privacy and Credit reporting policy, or our handling of your personal information (including credit-related information), please contact our Privacy Officer. 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 acknowledge its receipt to you in writing as soon as possible (and always within 7 days). Our written acknowledgement will set out how we propose to deal with the complaint.

We will endeavour to respond to your complaint as soon as possible. We will do our best to ensure that our investigation is completed, and a decision on your complaint is communicated to you, within 21 days of our being advised of the complaint. We will inform you if we need more than 30 days, and we will seek your agreement for a reasonable extension.

If we are not able to resolve your complaint to your satisfaction you may take the complaint to the Financial Ombudsman Service, the Australian Information 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: Australian Financial Complaints Authority,
GPO Box 3 Melbourne VIC 3001

Telephone: 1800 931 678

Website: www.afca.org.au

Office of the Australian Information Commissioner

Post: GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

Australian Prudential Regulation Authority

Post: GPO Box 9836, Sydney NSW 2001

Telephone: 1300 55 88 49

Website: www.apra.gov.au

Privacy Officer

Our Privacy Officer's contact details are:

Attention: Privacy Officer
RACQ Group Risk & Compliance
PO Box 4
Springwood QLD 4127

Email: privacy@racq.com.au

Disclaimer

This Privacy and Credit reporting 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 and Credit reporting policy.