

# GENERAL PRIVACY POLICY



## PROTECTING YOUR PRIVACY

At Holiday Coast Credit Union Ltd, we take seriously our responsibility for protecting your privacy and the confidentiality of your personal information. We will comply with the Privacy Act 1988 (Cth), the National Privacy Principles and the Mutual Banking Code of Practice.

We are committed to providing financial and related services to our members. To provide these services it is necessary for us to collect, store and use your personal information. We have been recording such information since our beginnings in 1967 and we have earned our members trust in doing so.

We will only deal with your personal information in the ways we describe to you in this policy.

## PERSONAL INFORMATION COLLECTED

We collect most personal information from you directly. For example, we may collect personal information when you apply for membership, open an account or loan, 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.

We do not generally collect any information that is 'sensitive personal information' such as relating to your health etc, unless it is necessary to provide you with a specific product or service. However 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.

If you cannot provide us with the information we require or you provide us with incorrect identification data to provide and maintain these services we may be unable to accept or continue your membership or to provide you with financial services. If you provide any information that is untrue, inaccurate, not current or incomplete or the Credit Union has reasonable grounds to suspect that such information is untrue, inaccurate, not current or incomplete the Credit Union has the right to suspend or terminate your access to the Holiday Coast Credit Union Website and/or discontinue to provide services to you.

We may need to source information about you from a third party; for example, a credit reporting agency or an insurer. Wherever possible this will be done with your authorisation or where this is not possible we will inform you when such information is collected.

We collect information when you use our Website. The information that we will collect about you will depend on how you use the facilities offered by the Holiday Coast Credit Union Website.

We will track traffic patterns throughout the Holiday Coast Credit Union Website. If you visit the Holiday Coast Credit Union Website to read, browse or download any information, our system will record:

- What country you are viewing our site from
- What operating system you are using
- Which browser you are using
- What hour of the day you visit our site
- Which day of the week you visit our site, and
- What pages you viewed.

The Holiday Coast Credit Union Website may at different times offer you a number of interactive facilities. These facilities may require you to input information in the form of personal financial information. These may include, but are not limited to, tools such as budget planners or loan calculators.

If you use any of the interactive facilities we do not capture and store any personal or financial information that you may have entered when using these tools. Once you leave any interactive facility, upon returning to re-use the facility at a later time you will be required to re-enter the required information to allow the program to complete any calculations or function, either in text form or graphically.

## **USE AND DISCLOSURE**

Personal information is treated as confidential within the credit union and is used by us for the purpose for which it was collected or for a related purpose.

We will use this information:

- For our register of members and shareholders
- To register as a user of the Holiday Coast Credit Union Website
- When you open an account with us – to verify your identity and address
- When we give you a loan – to verify your identity and address, for our assessment of your capacity to pay or, if you are giving us a guarantee, for that purpose
- Provide you with membership benefits or information about those benefits and our financial services and products
- Providing you with information about financial services and products from third parties with whom we have arrangements
- Conducting market or customer satisfaction research
- To create and maintain a financial service relationship.
- To recommend other products and services that may meet your needs.
- Comply with legislative and regulatory requirements, and
- Detecting and preventing fraud and other criminal activity

Sometimes we may need to give some personal information about our members to other organisations who provide services to 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. Examples of such organisations are:

- Our related entities
- Cuscal Ltd our banking services provider
- Abacus – the Australian credit union and Building Societies Association
- Computer bureaux etc which process our work
- Printing and mailing houses
- Insurers
- Valuers
- Legal advisers
- Conveyancers
- Persons you name as referees, or your employer, in loan applications
- Credit reporting agencies and other financial institutions that have previously lent you money (with your consent at the time)
- Lenders mortgage insurers
- Your guarantor
- Debt collection agencies (when enforcing your loan)
- Courts of law with jurisdiction over the jurisdiction over the enforcement of debts and securities
- External Dispute Resolution Centre (when you make a complaint to us about our service or products), and
- Auditors

Wherever our business is outsourced to third party contractors, such as mailing houses and Information Technology professionals, we undertake to ensure that these parties are bound by confidentiality and non-disclosure agreements. Information provided to these parties remains the property of the credit union and is only used for the specific purpose for which it is supplied and on completion it is returned to us.

## **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
- Transactions on your account, and
- Any other information you may disclose to us.

We will not disclose your personal information unless the disclosure is:

- Required by law
- Detecting and preventing fraud and other criminal activity, or
- With your specific consent.

## **DISCLOSURE TO THIRD PARTIES**

Except where required by law, we only disclose personal information to third parties with your express or implied consent. We do not disclose names and addresses to third parties for their own use and in particular we do not disclose names and addresses to third parties for their direct marketing.

## **YOUR CONSENT**

Your consent to us may be express or implied.

We obtain your express consent by asking you and recording that information, you writing to notify us of your consent or by you 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.

## **DIRECT MARKETING AND YOUR PRIVACY**

From time to time we will use the personal information we collect from you to inform you of products and services that we consider may be of interest to you.

If you do not wish to receive direct marketing information, you can tell us at any time by contacting our Compliance Manager.

## **TAX FILE NUMBER, MEDICARE NUMBERS AND PENSION NUMBERS**

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

## **IF YOU THINK THE INFORMATION WE HOLD ABOUT YOU IS INCORRECT OR YOU WANT TO UPDATE IT**

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 1300 365 7 24 and we will make all reasonable efforts for 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 your personal information and only for approved purposes. Your personal information can only be amended and deleted by authorised means.

Records that we hold containing your personal information may be in hardcopy documents or as electronic data.

Hardcopy documents are secured on our premises and at archive sites by locks and security systems. 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.

Our website uses the highest level of technology to ensure maximum security, including 128-bit encryption technology. However, 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 online banking services.

If you use our Internet Banking site you will receive an Access Number and you will be required to select your own PIN upon completing the Service's registration process. You are responsible for maintaining the confidentiality of the Access Number and PIN, and are fully responsible for all activities that occur under your password or account designation. You must:

- Immediately notify the Credit Union of any unauthorised use of your Access Number and PIN and any breach of security, and
- Ensure that you exit from your Internet session each time.

The Credit Union will not be liable for any loss or damage arising from your failure to comply with this requirement.

You acknowledge that the technical processing and transmission of the data may involve transmissions over various networks and changes to conform and adapt to technical requirements of connecting network or devices and you will take all reasonable steps to ensure your browser is suitably configured so that you will be advised whether the information you are sending to us will be secure (encrypted) or not secure (not encrypted).

We will notify you immediately if there is any unauthorised disclosure or access of your personal information.

## **ACCESS TO YOUR PERSONAL INFORMATION**

You may request access to the personal information we hold about you. We will provide you with such access wherever possible and within reasonable time. In most cases these requests will be free, but we may apply a fee for such access, to cover our costs depending on the extent of the information sought and what may be required by the Credit Union to meet your request. Before we act upon requests of this nature, we will tell you how much this service will cost.

Sometimes we are not required to provide you with access - for example, if the law says we can deny access. If we refuse you access to your personal information, we will tell you the reason why. If we are not required to provide you with access to the information requested, we will consider, if reasonable, whether the use of a mutually agreed intermediary would allow sufficient access to meet your needs and ours.

We would ask that any such request is stated as clearly as possible and adequately identifies the information you are seeking and where it is located.

## **CHANGES TO OUR PRIVACY POLICY**

This information relates to our current privacy policy. We may vary this policy from time to time. Changes to our policy will be published on our website. The Privacy Policy is available in all Branches at anytime.

## **RESOLVING PRIVACY ISSUES**

If you believe that the Credit Union has failed to observe the privacy of your personal information, you can register your concern or complaint with our Compliance Manager.

We will respond as soon as possible and usually within 2 working days, to let you know the person in our organisation who will be responsible for investigating the matter. If we are unable to resolve the matter within 10 working days we will contact you to let you know its progress and status and when we expect the matter to be resolved.

## **HOW TO MAKE A COMPLAINT OR ENQUIRY**

You can contact our Compliance Manager to register a complaint or concern, or to answer your questions relating to this Privacy Policy.

The Compliance Manager  
Holiday Coast Credit Union Ltd  
Private Mail Bag 9  
Wauchope NSW 2446

Telephone: 1300 365 7 24

Email: [ubelong@hccu.com.au](mailto:ubelong@hccu.com.au)

---

## **DISCLAIMER**

The information on this site, including source code, is the property of the Credit Union and subject to Copyright. Unauthorised use of the information is not permitted.

The information on this site is of a general nature and it is not intended that it should be used for the purpose of making decisions about acquiring any product or service of the Credit Union. The Credit Union accepts no responsibility for any loss, cost or expense arising from use of the information in this site. Full product and service information is available from any branch of the Credit Union.

All the information on this site is subject to change without notice and the Credit Union cannot guarantee the accuracy or completeness of the information. It is our aim to uphold the integrity and accuracy of all details within this Web Site, but is done so without guarantee. Products and services of the Credit Union are only available in Australia and only available to persons or corporations that satisfy membership criteria.

This site may contain information of, or links to, other parties and their opinions are not necessarily those of the Credit Union. The presence of any link or information of other parties should not be construed as an endorsement of those parties or the accuracy of their information.

Full information on all products and services is available from any of our branches or by phoning 1300 365 724, or emailing [ubelong@hccu.com.au](mailto:ubelong@hccu.com.au)