

As at 26 October 2021

Ian Berry Insurance Services Privacy Policy

Ian Berry Insurance Services Pty Ltd is an authorised representative No 259485 of Police Credit Union Ltd ACN 087 651 205 ('we', 'us', 'our') is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (**Privacy Act**).

This Privacy Policy outlines how we deal with your personal information, as well as our legal obligations and your rights in relation 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 identified individual or an individual who is reasonably identifiable. Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about the individual.

2. Personal information we collect

The kinds of personal information we collect about you varies depending on the nature of our dealings with you. For example, we collect personal information about you when you apply for or use our products or services, speak to us on the phone, electronically or in our branches, engage with us in relation to promotions or competitions we are running, use our electronic platforms (such as our website, internet banking and mobile apps), or apply for employment with us or work for us as a contractor.

Wherever possible, we will collect personal information directly from you. The personal information we collect about you if we provide you with banking and financial services will generally come from what you provide in your application for the relevant products or services and supporting documentation and includes:

- identifying information, like your name, address and other contact details and your date of birth
- your employment or work details
- your tax residency details and taxpayer identification number (including tax file number), and
- your reasons for applying for a product or service.

We may also collect personal information about you when you use our electronic platforms including our website, internet banking or mobile apps (see 'Website' below) and we also create personal information about you through our internal processes, like considering application you submit to us or processing transactions on your account.

Due to the nature of our business, it is generally not possible for us to provide products or services to you anonymously or by using a pseudonym, or without complete and accurate information.

3. Purposes for which we collect, hold, use and disclose personal information

We collect, hold, use and disclose your personal information for the purposes of:

- verifying who you are (such as when you apply for or open a product or communicate with us)
- assessing and processing an application from you for the products and services we offer
- providing and managing products and services we provide to you
- communicating with you, including assisting you with your queries, concerns and complaints;
- marketing products and services to you (unless you have requested not to receive direct marketing communications from us – see 'Marketing' below)
- complying with our legal and regulatory obligations, including anti-money laundering and counter-terrorism financing requirements and obligations we owe under industry codes of practice; and
- managing and performing our necessary business functions, including:
 - o establishing and providing our systems and processes to provide our products and services to you
 - o executing your instructions
 - o charging and billing
 - o maintaining and developing our business systems and infrastructure
 - o research and development
 - o collecting overdue payments due under our credit products; and
 - o managing our rights and obligations regarding external payment systems, and
- other uses required or authorised by law.

4. Who we disclose personal information to

We may disclose your personal information to other organisations, for the purposes set out above, including to:

- our related companies
- 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
- superannuation funds, where superannuation services are provided to you
- our professional advisors, such as accountants, lawyers and auditors
- your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you, or

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- if required or authorised by law, to government and regulatory authorities.

We disclose personal information to overseas recipients only where the information is collected using the member communication platform, 'LivePerson' or for the purposes of complying with the Foreign Account Tax Compliance Act (which applies in relation to some customers with US connections). The countries where recipients of such information are likely to be based are the United States of America and United Kingdom. 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 Policy.

We may also disclose your personal 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 (including where you have consented to an accredited data recipient collecting some of your personal information and us disclosing it to that accredited data recipient under the Consumer Data Right – for more information see our Consumer Data Right Policy which is available on our website and on request), 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.

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 sensitive information without your consent, 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. Security and storage of your information

We take all reasonable steps to ensure that your personal 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. Some of your personal information may be held by a third party data storage provider. 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 authorised 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, one-time 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 to your personal information. If you do, you may breach the pass code security requirements of 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 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.

7. Website

This section explains how we handle personal 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 13 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 may 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,

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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 or purposes for which it was provided.

Security

We use up-to-date security measures on our website to protect your personal information. Any data containing personal 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, you will need to obtain a copy of their privacy policy.

Google

We use the Google Analytics cookie, Google Ads Conversion tracker, Google Analytics Advertising Features and other Google services that place cookies on a browser across our website. These cookies help us increase our website's effectiveness for our visitors. These cookies are set and read by Google. We use data from Google Analytics Demographics, Interest Reporting and third party audience data to help us understand how people find and use our site. To opt out of Google tracking, please visit this page.

<http://www.google.com/policies/technologies/ads/>

We use Google Ads remarketing to market our sites across the web. We place a cookie on a browser, and then a third party (Google) reads these cookies and may serve an ad on a third party site. You may opt out of this ad serving on Google's opt out page which is linked on this page.

<http://www.google.com/policies/technologies/ads/>

Our cookies do not collect personal information. We also use other tracking cookies from other online advertising publishers. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

8. Access

You may request access to the personal information that we hold about you at any time from our Privacy Officer whose details are in paragraph 13 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.

Under the Consumer Data Right you may also access some of the personal information that we hold about you if we provide you with products and/or services. Our Consumer Data Right Policy is available on our website or on request and explains what personal information you can access and how to access it.

9. Accuracy and correction

We take reasonable steps to make sure that the personal information that we collect, hold, 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 13 of this Privacy Policy.

For requests to correct information we have disclosed to an accredited person under the Consumer Data Right, please see our Consumer Data Right Policy which is available on our website or on request.

10. Marketing

Where we are permitted to do so by law, we 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 our customer 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 paragraph 13 of this Privacy Policy or via secure messaging which is available via our Online Banking or Police Credit Union Banking App.

Unless we have first obtained your consent, we will not provide your personal information to other organisations to use for their marketing purposes.

11. 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.

12. Questions and Complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information, please contact our Privacy Officer whose details are in paragraph 13 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, we 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 Dispute Resolution Officer will investigate further and respond to you.

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If you are still not satisfied, you can contact external bodies that deal with privacy complaints. These are Australian Financial Complaints Authority (AFCA) which is our external dispute resolution scheme, and 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

Mail Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

Telephone 1800 931 678 (free call) 9am-5pm AEST

Email info@afca.org.au

Website www.afca.org.au

Office of the Australian Information Commissioner

Mail GPO Box 5218, Sydney NSW 2001

Telephone 1300 363 992

Website www.oaic.gov.au

13. Privacy Officer

Our Privacy Officer's contact details are:

Mail Police Credit Union Ltd,
17-23 Carrington Street, Adelaide SA 5000
PO Box 6074, Halifax Street, Adelaide SA 5000

Telephone 1300 131 844

Email privacyofficer@policecu.com.au