Privacy and Credit Reporting Policy

TEACHERS MUTUAL BANK LIMITED

Context

This Privacy and Credit Reporting Policy explains how we handle personal information.

Australian Mutual Bank, Teachers Mutual Bank, Health Professionals Bank, Firefighters Mutual Bank, UniBank are divisions of Teachers Mutual Bank Limited.

Our Privacy and Credit Reporting Policy is published on our website.

It is relevant for our Members and customers, who have products and services via the following brands:

- Australian Mutual Bank
- Teachers Mutual Bank
- Health Professionals Bank
- Firefighters Mutual Bank
- UniBank

It is also relevant for other individuals with whom we deal in the course of our business – such as prospective Members and customers, account signatories, holders of powers of attorney, legal personal representatives and the like.

Meaning of words

In this policy, the following applies:

"We", "us" and "our" means Teachers Mutual Bank Limited ABN 30 087 650 459 AFSL/Australian Credit Licence 238981.

"You" and "your" includes our Members and customers as well the other individuals referred to above with whom we deal in the course of our business.

1. Our commitment

We value your trust in us. It is important for us to keep personal information about you secure and confidential. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

To achieve this, we comply with the Privacy Act 1988 (which includes the Australian Privacy Principles and Part IIIA, the latter relating to credit information.)

During the course of our dealings with you, we may provide more information about how we handle personal information about you. If that further information provides that we may do this in a way that is different from this Policy, then the terms of that further information will prevail.

2. About us

We operate under the brands Australian Mutual Bank, Teachers Mutual Bank, Health Professionals Bank, Firefighters Mutual Bank and UniBank. This policy may be viewed on our websites.

3. Information we collect

Information we collect from you

Generally, we collect personal information about you directly from you. We do so when you open a membership, open an account, or perform a transaction with us. The kind of information we collect will vary according to whether, for example, you wish to open a membership, apply for credit, act as a signatory or as a guarantor, or open an account as a customer. When you open accounts with us, we collect information about your transactions, such as payments to and from your account and the details of those payments, including source and destination.

We have "KYC" obligations under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006.* "KYC" stands for "Know Your Customer" which means we are required to verify that our members and customers are who they say they are and to monitor account and transaction activity.

When you open a transaction or savings account, we usually ask for, at least, your full name, date of birth, residential address and contact details. We also ask for evidence of your identity. We may also ask for your occupation and source of income and/or wealth. If you apply for credit, we ask for details of your financial history and position. In all cases, we may collect further information at any time to meet our obligations under the "Know Your Customer" requirements of the anti-money laundering and counter-terrorism legislation.

Information collected through our digital services

When you use our websites, mobile applications or other digital services, we may collect information about your device and how you use those services. This may include your IP address, general location, device and browser details, pages viewed, links selected, and identifiers connected with your device, browser or online activity.

We may collect this information using cookies, pixels, tags and similar technologies operated by us or third-party service providers. This information may be personal information if it identifies you or can reasonably be linked with other information to identify you. Please refer to our website terms and conditions for more information about cookies.

Information we collect from third parties

We also collect information about you from third parties such as brokers or your employer.

If you apply for credit, we may need to obtain a credit report from a credit reporting body. Our Privacy Consent –Lending has more information about credit reports and your credit information.

Sensitive information

We may need to collect sensitive information, such as health information, where necessary for insurance or hardship applications. We may also collect details of your membership of a professional or industrial association to determine whether you are eligible to become a member.

What happens if you do not provide us with sufficient personal information about you?

If you do not provide us with the personal information we need, we may not be able to provide (or continue to provide) you with the products or services you are seeking or using. This means that we may close your accounts and terminate our relationship with you.

4. How do we use your information?

We collect, use, hold and disclose personal information so that we can deliver our products and services. We also use your information for other reasons, such as to better understand you, your needs, and to let you know about other products and services you might be interested in.

Here is a list of the ways we may use your personal information:

- establish your identity as required by the *Anti-Money Laundering and Counter Terrorism Financing Act* 2006 and, if you are providing real property security, relevant State or Territory real property legislation.
- assess your eligibility for membership
- process applications for products and services, including loans
- design our products and services
- manage our relationship with you, including in relation to registration of security interests in property under the *Personal Property Securities Act* 2009
- manage our risks and help identify and investigate inappropriate or illegal activity, such as fraud
- support your participation in government programs or schemes (such as Housing Australia)
- contact you
- improve our products and services and your experience with us
- comply with our legal obligations (including to assist law enforcement agencies or regulators where we are required to do so)
- facilitate, administer and support payment services, card-based payment solutions, including services provided in partnership with payment schemes, payment processors and technology providers
- inform you about products or services that we think may be of interest to you, including those of our business partners and
- understand and improve our digital services, measure our marketing, and provide content and advertising that may be more relevant to you.

We may also collect, use and share your information for other lawful purposes, or where we are required or authorised by law to do so.

Automated decision-making

We may use computer programs to make decisions about you, or to provide information that helps our employees make decisions about you. This may include assessments, scores, classifications, matches, alerts or recommendations.

This section applies to decisions that may significantly affect your rights or interests.

Information used by computer programs

Depending on the product, service or decision, these computer programs may use:

- your identity and contact details;
- information used to verify your identity or confirm that it is you;
- your employment, income and other financial information;

- your expenses, debts and other financial commitments;
- information about your residential circumstances, property or security;
- your credit history and credit reporting information;
- information about your accounts, products, payments and transactions;
- information about your device, online session and how you use our digital services;
- information used to identify unusual or suspicious activity, account misuse or unauthorised access;
- information used to detect, prevent or investigate fraud, scams, sanctions, money laundering or other financial crime;
- information relevant to our legal and regulatory obligations; and
- other personal information relevant to your application, the products or services we provide to you, processing transactions, managing risk or managing our relationship with you.

We may collect this information from you, generate it when you interact with us or use our digital services, or obtain it from third parties. These third parties may include credit reporting bodies, identity verification providers, fraud prevention services and other service providers.

Decisions made solely by computer programs

In some circumstances, computer programs may make decisions about:

- whether you can proceed through an automated identity verification or onboarding process;
- whether you can be onboarded or re-onboarded;
- whether we can confirm that it is you when you access an account or digital service;
- whether access to an account or digital service can proceed, be delayed or restricted, or whether additional verification or review is required;
- whether a payment, transaction or other account activity can proceed, be delayed, restricted or referred for review; and
- whether you, your device, online session, account or transaction match fraud, scam, sanctions, money laundering, financial crime or other risk criteria.

Decisions informed by computer programs

Computer programs may also provide assessments, scores, classifications, matches, alerts, recommendations or other information that our authorised employees use when making decisions about:

- whether you meet our lending, credit, onboarding or product eligibility requirements;
- whether a loan, credit product, account or service is available to you;
- how much we may be willing to lend you;
- your ability to afford or repay a loan;
- verifying your identity, confirming that it is you, or onboarding you;
- fraud, scams, sanctions, money laundering, financial crime or other risks;
- whether activity appears unusual or suspicious, or may indicate fraud, a scam, account misuse or unauthorised access;
- whether an account, transaction or activity should be reviewed, restricted or investigated;
- whether we need further information, verification, review or other action; and
- remediation, reimbursement or compensation.

These decisions may affect your access to or use of our products, services, accounts, digital services, transactions, payments or other options available to you.

You can contact us if you would like more information about our use of computer programs in decisions about you. You can also ask to access or correct your personal information as explained in this Privacy and Credit Reporting Policy.

Direct marketing

We may also use your personal information to inform you about products and services we believe may be of interest and value to you, but we will stop if you tell us to. We may contact you by mail, telephone, email, SMS or other electronic means, including through social media, our websites, online banking services or other digital platforms.

We may also use or disclose your personal information to select or exclude audiences, show you advertising that may be more relevant to you, and measure our marketing. This may include advertising on social media, third-party websites and other digital platforms.

Cookies, pixels and similar technologies

We and our service providers may use cookies, pixels, tags and similar technologies on our websites, mobile applications and other digital services to:

- operate, secure and improve our digital services;
- remember your settings and preferences;
- understand how our digital services are used;
- measure website and marketing performance;
- understand whether advertising leads to a visit, enquiry, application or other interaction; and
- provide or measure advertising that may be more relevant to you, including on third-party platforms.

Some of these technologies are operated by advertising, analytics, social media and technology providers. Information collected through them may be shared with those providers. Depending on the technology and your settings, a provider may link the information with your device, browser, account or online profile, or with other information it holds about you.

We take steps to minimise the personal information collected and shared through these technologies and to manage the related privacy risks.

Your marketing and advertising choices

If you do not want to receive direct marketing offers from us, or want us to stop using or disclosing your personal information for direct marketing, including targeted advertising, you can:

- send us a secure message through Internet Banking or the Mobile App;
- call us or visit a branch; or
- use the unsubscribe link in a marketing email.

We may first require you to log into Online Banking or otherwise identify yourself.

You can also manage cookies through your browser or device settings and advertising preferences through the relevant third-party platform. These settings may affect how our digital services work and may not stop all online tracking or advertising.

5. To whom do we disclose personal information?

Third parties

The types of people and entities we disclose personal information about you to include:

- people and entities with whom we have outsourcing or service arrangements, including statement production and delivery, card production, identity confirmation and verification, loan origination, verifying loan applications, auto credit decisioning, payment processing and systems, digital payment service providers, payment schemes, card network operators, banking services, data and transaction processing, information technology support, document storage, legal and accounting services
- lenders' mortgage insurers and valuers
- marketing, advertising, analytics, social media, website technology and market research service providers
- brokers, agents and advisers acting for you
- persons and organisations who assist us in monitoring recorded calls for the purposes of quality assurance, training and acknowledgement
- persons acting on your behalf, for example guardians, financial managers and persons holding power of attorney
- guarantors and proposed guarantors
- persons involved in arrangements that provide funding to us, including trustees and managers of securitised loan programs
- ratings agencies
- other financial institutions, for example so that we can process a claim for mistaken payment
- our auditors, insurers and re-insurers
- employers or former employers (to verify employment in the case of loan applications)
- government and law enforcement agencies or regulators
- government program administrators (such as Housing Australia) where you participate in those programs
- credit reporting bodies and other credit providers
- organisations that help identify and investigate inappropriate or illegal activity, such as fraud and
- Consumer Data Right accredited data recipients where you have consented to the accredited data recipient collecting the personal information from us and us disclosing the personal information to the accredited data recipient (see our *Consumer Data Right Policy* available on our website and on request for more information).

Under 16s and special needs

If you are under 16 or have special needs, we may share your information with your parent or legal guardian, any person appointed to manage your affairs or a Government agency providing trustee or guardian services to you.

1. The DVS is a national online system that allows personal identifying information about individuals to be compared against government records. Your information will be matched against that held by the relevant government department or agency. You can find out more about the DVS on their website.

Sending information overseas

We may disclose personal information to business partners and service providers that operate overseas or store or process information overseas. This may include providers of information technology, identity verification, data processing, analytics, marketing, advertising and social media services.

Electronic verification of identity

- **Section A**

  We are required under the Anti-Money Laundering and Counter-Terrorism Financing Act to collect and verify information relating to your identity. Subject to your consent, we may disclose your name, address, date of birth and other identity information to credit reporting bodies, the government's Documentation Verification Service (DVS)[1] and third party identification verification providers that assist us to verify your identity. Our identity verification providers (ID Verifiers) include OCR Labs Pty Ltd (ACN 603 823 276) trading as "IDVerse", InfoTrack Pty Ltd (ACN 092 724 251), GBG (Australia) Pty Ltd (ACN 097 737 105) trading as "Green ID" and NextGen.Net Pty Ltd (ACN 062 989 753) (ID Verifiers).

  To access such information, our ID Verifiers are registered to act on our behalf under the DVS to:

  - request that a credit reporting body provide us with an assessment as to whether your personal information matches that held in their credit information files. (In preparing this assessment, the credit reporting body may use the personal information of other individuals);
  - disclose your personal information to the DVS;
  - search other public records.

- **Section B**

  We are also required under the State based real property laws to collect personal information and verify the identity of mortgagors for mortgages (VOI). These laws are: the Electronic Conveyancing (Adoption of National Law) Act 2012 (NSW), Electronic Conveyancing (Adoption of National Law) Act 2013 (Victoria), Electronic Conveyancing National Law (Queensland) Act 2013 (Queensland), Electronic Conveyancing Act 2014 (Western Australia), Electronic Conveyancing National Law (South Australia) Act 2013 (South Australia), Electronic Conveyancing (Adoption of National Law) Act 2013 (Tasmania), Electronic Conveyancing (National Uniform Legislation) Act 2013 (Northern Territory) and Electronic Conveyancing National Law (ACT) Act 2020 (Australian Capital Territory).

  In this sub-section, "you" or "your" mean the proposed mortgagor(s). Subject to your consent, our identity verification may be performed by an ID Verifier. To verify your identity, information about you, including data from your identity document(s), your biometric data and information about your device and location will be provided to an ID Verifier. For further details about how these ID Verifiers may collect, hold, use or disclose your personal and sensitive information please refer to the respective service provider's privacy policy.

If you do not consent to these processes, alternative forms of verifying your identity are available on request.

If we are unable to verify your identity using the above methods, you will be provided with a notice to that effect. You may then be asked to provide further evidence of your identity. If we are unable to verify your identity to our satisfaction, we will not be able to admit you to membership or provide you with the services or products you seek.

6. Credit checks and credit reporting

When you apply for credit, then, under the responsible lending obligations in the *National Consumer Credit Protection Act*, credit providers need to see your credit history and present position in order to assist them in meeting their obligations.

Consequently, we may obtain a credit report about you from a credit reporting body when you apply for credit with us.

Credit reports

A credit report contains information about your credit history. This helps us assess your credit worthiness, credit applications, verify your identity and manage the loan accounts and credit facilities you have with us.

What information can we exchange with credit reporting bodies?

The information we exchange includes your identification details, what type of loans you have, how much you've borrowed, whether or not you've met your payment obligations and if you have committed a serious credit infringement.

We also ask the credit reporting body to provide us with an overall assessment score of your creditworthiness.

The credit reporting bodies we use are:

- Equifax Australia Information Services and Solutions Pty Ltd (Equifax Australia)
- Experian Australia Credit Services Pty Ltd (Experian Australia)

You can download copies of these organisations' privacy policies as follows:

- Equifax Australia – at equifax.com.au
- Experian Australia – at experian.com.au

Comprehensive credit reporting

We can pass to a credit reporting body or bodies (the ones we use are Equifax Australia, Experian Australia or all of them) details of your credit information and history – including credit you have applied for, the amounts you have borrowed, whether or not payments have been made on time.

Pre-screening and restricting disclosure in cases of fraud

Credit providers may ask credit reporting bodies to use their credit-related information to pre-screen you for direct marketing. You can ask a credit reporting body not to do this. Also, if you've been, or have reason to believe that you may have been, are, or likely to become, a victim of fraud (including identity fraud), you can ask the credit reporting body not to use or disclose the credit-related information it holds about you.

Accessing your information and making a complaint

You can access your credit information, request that we correct any information and make a complaint in the same manner as you can with the remainder of the personal information we hold. See Clauses 8 and 9.

7. Keeping your information secure

We hold personal information in our banking system, either as electronic, voice or paper files.

As we have a commitment to ensure all personal information is held securely, we have in place security systems to protect information from unauthorised access. We also limit access to our authorised personnel.

Where personal information is no longer needed for any of our functions or activities, we ensure that the information is securely destroyed or de-identified.

8. Accessing and correcting personal information (including credit information) about you

Accessing personal information about you

You can do this by downloading and completing the Request for Access to Personal Information form included at the end of this Policy.

You can forward the form to us using the contact details set out at that end of this Policy.

You can also access some of the personal information we hold about you through the Consumer Data Right. Our *Consumer Data Right Policy* is available on our website and on request and contains information about accessing your CDR data through the Consumer Data Right including what data you can access and how you can access it.

Is a fee charged?

We may charge you a fee for providing access to personal information about you. That covers our time spent in locating and putting the information together.

Updating and correcting information

It's important that we have your correct details, such as your current address and telephone number. Please ensure that your details with us are always current.

You can also ask us to correct any information we hold if it is inaccurate. If we have passed that information on to third parties (e.g. a credit reporting body), then you can ask us to contact those other parties.

If your request for access and correction involves credit-related information provided to us by others (e.g. credit reporting bodies or other credit providers), we will need to contact them. We'll try to have the information corrected within 30 days. If we can't meet that, we'll let you know the reason for the delay and try to agree a timeframe with you to extend the period.

We'll contact you when the process is complete.

What if we cannot agree that the information should be corrected?

If we do not agree with you that information should be corrected, we'll advise in writing with our reasons. You can ask us to include a statement with the relevant information, indicating your view that the information is inaccurate, misleading, incomplete, irrelevant or out-of-date. We will take reasonable steps to comply with such a request.

9. Making a privacy complaint

How do I complain about a privacy matter?

To lodge a complaint, please contact us using the details set out at the end of this Policy. We will deal with the matter via our internal complaints processes.

External review

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

You can contact AFCA as follows

Website: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678 (free call)
Mail: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

You may also contact the Office of the Australian Information Commissioner at:
1300 363 992
online at www.oaic.gov.au or
Office of the Australian Information Commissioner,
GPO Box 5218, Sydney NSW 2001

10. Amending this Policy

We may amend this Policy at any time. The new version will be published on our website.

How to contact us

If you have any queries regarding privacy, use any of the methods set out below:

You can also contact us to change your marketing preferences or ask us not to use or disclose your personal information for direct marketing, including targeted advertising.

Teachers Mutual Bank Limited

Address: Level 7, 10 Shelley Street, SYDNEY NSW 2000
Phone: 1800 862 265
Email: privacy@tmbl.com.au
Post: GPO Box 5313 SYDNEY NSW 2001