

Consumer Data Right (CDR) Policy

1 November 2021

About us

Easy Street Financial Services is a division of Community First Credit Union Ltd (ABN 80 087 649 938) (**we, us, our**) and is a **CDR participant**. CDR participants includes data holders and accredited data recipients:

- A **data holder** is a business that holds consumer data and must transfer the data to an accredited data recipient at the consumer's request.
- Under the CDR system, consumers consent to a transfer of their data from a data holder to an **accredited data recipient**. An accredited data recipient has been accredited by the ACCC to receive consumer data to provide a product or service. Examples of accredited organisations include banks and other financial institutions.

We are currently a data holder. This means we will share your data with an accredited organisation, but only when you authorise us to do so. This means starting from 1 November 2021, you can ask us to share "required product data" with you or an accredited organisation.

About this policy

Under the CDR Laws, all CDR participants must have a CDR policy that is a separate document to its privacy policy. We have put together this CDR Policy to provide you with information about:

- how we manage your CDR data;
- how you can access and correct your CDR data;
- how to request general product data; and
- how you can make an inquiry or make a complaint, if needed

This policy only applies to data under the CDR regime (CDR Data). For information about how we collect, use, hold and disclose your personal information under Privacy Laws, see our [Privacy Policy](#).

All references in this policy to data relates to data in the context of the CDR, which is called **CDR data**, and includes information about you such as your name and contact details, as well as detailed information about your use of a specific product or service. This is further explained below. Our Privacy Policy continues to govern how your personal information is managed.

We will review this CDR Policy annually and we may make changes to it from time to time (without notice to you) that are necessary for our business requirements or the law. Our current CDR Policy is available on our website. You can request us to provide this policy to you electronically or in hard copy.

About the CDR

The Consumer Data Right was introduced by the Australian Federal Government to give customers more choice and control over how their data is shared.

Under the Competition and Consumer Act 2010 and the Competition and Consumer (Consumer Data Right) Rules 2020 (**CDR Laws**), you can request access to and correct CDR Data about you. You can also authorise us to share this data with accredited persons.

The Australian Competition and Consumer Commission, or ACCC, is the lead CDR regulator. You can find out more about the CDR system on the ACCC's website [here](#).

CDR Data

You can authorise us to share specific CDR data we hold about you with an accredited organisation. This specific CDR data is called your "required consumer data" under the CDR Laws, and it includes:

- your name, occupation and contact details
- account details including account number, account name, balances and transaction details and information about any authorised third party operators

- information about direct debits, scheduled payments and saved payees on your accounts
- information about the products you have with us including product features and fees & charges

For example, if you apply for a home loan with a bank and they request to see the transactions on your Easy Street savings account as part of their credit assessment, you can authorise us to share your CDR data relating to that savings account with them if they are accredited to receive data under the CDR.

If you authorise us to share your CDR data, we can disclose it in a machine-readable form to the accredited organisation of your choice. To make a request, please contact us by using the details listed under “Contact us” below. You can withdraw your authorisation at any time. We will confirm your request to withdraw authorisation as soon as practicable upon receipt of such a request.

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

We can only share your CDR data with accredited organisations (unless required by law) and if you are eligible to make a sharing request under the CDR Laws.

General Product Data

Upon request, we will share “required product data” with you or an accredited organisation. Under the CDR Laws, this is public information about the products and services that we offer, such as transaction accounts, savings accounts, home loans, personal loans, credit cards, and insurance. This generally includes information about the eligibility criteria, terms and conditions, price, availability or performance of a product. Because this information is generic in nature, it does not specifically relate to you or identify you.

To request us to share “required product data”, please contact us by using the details listed under “Contact us” below. We can then disclose the information to the person who made the request in machine-readable form.

Voluntary Data

We will only share data that we are required to share under the CDR Laws. This means we will not share any “voluntary data”.

In the future, we may accept requests for some types of voluntary data. We will not charge a fee if we provide access to voluntary data.

Why we collect, hold, use and disclose CDR Data

We collect and use CDR Data for a number of purposes, such as:

- providing membership benefits, financial services and products or information about those benefits, services and products
- providing you with information about financial services and products from 3rd parties we have arrangements with
- conducting market or customer satisfaction research

If you withdraw your consent for us to collect and use your CDR Data, we may not be able to provide the above services to you.

We hold and disclose CDR Data as required by law and to comply with the CDR regime.

Disclosing CDR Data

We will only disclose CDR Data to an accredited person if you have authorised us to do so.

We will only disclose CDR Data as required under the CDR regime or to otherwise comply with the law. We will not accept any requests for disclosure of voluntary data. We do not share your external CDR data to outsourced service providers.

Disclosure to overseas recipients

We will not disclose CDR Data to entities that are based overseas unless you authorise us to do so.

Notifications

We will notify you about certain events relating to your CDR Data including when:

- you give consent to us collecting and using your CDR Data



- you withdraw your consent for us to collect or use your CDR Data
- we collect your CDR Data
- if your consent is still current, it has been 90 days since we have been in contact with you
- we respond to your request to correct your CDR Data
- there has been an 'eligible data breach' under the Notifiable Data Breach scheme

How you can access and/or correct your CDR Data

You can request access to your CDR Data at any time. You can request access to your CDR Data directly, or you can authorise an accredited person to do so on your behalf.

If the CDR Data we hold is incorrect, you can request that we update the information by using the details listed under "Contact us" below. Any request to correct data we hold on you or your accounts will not incur a fee.

We will confirm that we have received your request by acknowledging as soon as possible. We will then aim to let you know in writing within 10 business days whether we corrected your CDR data, or, if we found it to be correct, complete and current, we will let you know and explain why, and provide options available to you to escalate the matter.

If we have shared your CDR data with an accredited organisation with your authorisation, and later discovered that the CDR data we shared was not correct, we will notify you of this in writing within 5 business days. The corrected CDR data will be shared the next time it is requested. If you would like to receive your corrected CDR data, you can ask the accredited organisation to request it again in the manner described above.

If you are an individual, you may also be able to access and/or correct CDR Data that is your personal information. If you would like us to update your personal information which is governed by our Privacy Policy, you can contact our Privacy Officer whose details can be found in the Privacy Policy.

Making a complaint

If you are unhappy with the way that we have dealt with your CDR Data, you can access our internal dispute resolution scheme at any time without charge. You can make a CDR complaint in the following ways:



- by calling us on 1300 13 14 65:
 - Monday to Friday: 8am - 8pm
 - Saturday: 8am - 3pm
- by email at askus@easystreet.com.au
- in writing to:
 - Easy Street Financial Services
 - PO Box 98
 - Lidcombe NSW 1825

When making your complaint to us, please:

- identify yourself
- include your contact details (address, email, phone number)
- the date (if you are lodging a complaint in writing)
- give any identification or reference number(s), such as your member number
- give a brief description of the matter and why you think we have mishandled your CDR data (what happened, when it happened and any consequences)
- let us know what you would like us to do to resolve the matter

Please provide as much information as possible to help us manage your complaint.

We aim to acknowledge your complaint within 2 business days. We will investigate your complaint and contact you if we need more information. Most complaints will be resolved within 21 days but some complaints may take up to 45 days to resolve.

How your complaint is resolved will depend on your complaint.

If an issue has not been resolved to your satisfaction, you can contact the Office of the Australian Information Commissioner, or OAIC, being the primary complaints handler for the CDR system. You can also contact our external dispute resolution scheme, the Australian Financial Complaints Authority, or AFCA. OAIC's and AFCA's service is free to access, and their contact details are:

OAIC

Post: GPO Box 5218 Sydney NSW 2001
Telephone: 1300 363 992
Website: www.oaic.gov.au
Email: enquiries@oaic.gov.au

AFCA

Post: GPO Box 3, Melbourne VIC 3001
Telephone: 1800 931 678 (free call)
Website: www.afca.org.au
Email: info@afca.org.au