Member Privacy Policy

Easy Street Financial Services, a division of Community First Credit Union Ltd (ABN **80 087 649 938** ('we', 'us', 'our') is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (Privacy Act). We are 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, and the Privacy (Credit Reporting) Code 2024.

This Privacy 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 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:

(a) whether the information or opinion is true or not; and

(b) whether the information or opinion is recorded in a material form or not.

Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about an individual.

"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 their repayment history, or that the individual has agreed to be a guarantor
- financial hardship information
- 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, inrelation 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 tocredit that an individual has obtained or applied for
- information about an individual on the NationalPersonal 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 Policy.

"Credit-related information" means credit information, credit eligibility information and related information.

2. Collection

We may collect personal information from you by various means including in-person, by telephone, using video conferencing, by email, by letter, and through our website, social media channels, and mobile apps.

Wherever possible, we will collect personal information (including credit-related information) directly from you. This information will generally come from what you provide in or with your applications for membership and/or our products or services.

We only ask for personal information relevant to our business relationship with you. When you apply for one ofour products or services, we may request:

- identifying information, like your name, address andother 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 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 (including credit-related information) about you from third parties, such as any referees that you provide, your employer, 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 inthe 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.

We may not be able to provide you access to our products and services we may offer if you do not provide or allow us to collect your information, or the information you give us is inaccurate or incomplete.

3. Use

We may use your personal information (including credit- related information) for the purpose of providing products and services to you, managing our business and complying with the law. This may include:

- assessing and processing your application for the products and services we offer (including assessing whether you are eligible for the First Home Guarantee offered by the Australian Government (if applicable));
- establishing and providing our systems and processes to provide our products and services to you
- providing you with membership benefits, financial products and services or information about those benefits, products or services
- providing you with information about financial products and services from third parties we have arrangements with
- executing your instructions
- charging and billing
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- research and development, including conducting market or customer satisfaction research
- collecting overdue payments due under our creditproducts
- managing our rights and obligations regarding external payment systems, and
- marketing, including direct marketing (sensitive information will only be used with the consent of members).

Automated decisions

We may arrange for a computer program to make decisions, or to do things substantially and directly related to making decisions, that could reasonably be expected to significantly affect your rights or interests.

The kinds of personal information that may be used for these computer programs are:

- identifying information and contact details
- transaction and credit history
- demographic information
- online behaviour and interaction data

The kinds of these decisions that are made solely by the operation of computer programs are eligibility related, whether it is appropriate to offer you credit or a loan.

The kinds of decisions where a computer program does a thing that is substantially and directly related to making the decision are:

- credit or loan eligibility assessments
- insurance risk calculations
- pricing and service offerings
- fraud detection and prevention

If you have any concerns about how your personal information may be used by computer programs in making decisions, you should contact our Privacy Officer.

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 Policy
- a purpose you would reasonably expect
- a purpose required or permitted by law, or

- a purpose otherwise disclosed to you to which youhave consented.

4. Disclosure

We may disclose your personal information (including credit-related information) to other organisations, for example:

- our related companies
- external organisations that are our assignees, agentsor contractors
- external service providers to us, such as organisations which we use to verify your identity,payment systems operators, mailing houses and market research or direct marketing contractors
- providers of payment and card services, when you make a transaction or receive a payment using a payment service or a card
- 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 youapply for a loan from another credit provider and you agree to us providing information
- credit reporting bodies, including:
  - information about you (such as your name and address);
  - the type of credit you have, the terms and conditions of that credit, the credit limit and when the credit is closed (if relevant);
  - repayment history information including if you have made all your repayments if you miss repayments on your credit;
  - payment information including where you make a payment after the due date; and
  - default information including if you default on your obligations, commit fraud or another serious credit infringement.
- affiliated product and service suppliers to provide information to you about their products and services
- 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 and auditors
- 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
- any organisation with which we are considering merging
- your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you,
- the Australian Government and Housing Australia in relation to the First Home Guarantee; or
- if required or authorised by law, to government and regulatory authorities or other organisations.

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and Australian privacy obligations with respect to the protection of your personal information, and that the information will be used only for the purposes set out inthis Privacy Policy.

We may disclose your personal information (including credit-related information) overseas. The countries where we are likely to disclose your personal information (including credit-related information) include **United Kingdom, India, the Philippines, the Netherlands and USA.** 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.

Before disclosing your personal information to any recipient outside of Australia who is not you or us, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your information. However, we may disclose your personal information (including credit-related information) to an overseas recipient without taking these steps if:

- the recipient is subject to a law or binding scheme that protects your information in a way that is substantially similar to the Australian Privacy Principles, and you can take action to enforce that protection
- the recipient is subject to the laws of a country or a binding scheme prescribed by regulations, and meets any prescribed conditions
- we expressly inform you that by consenting to the disclosure, the above protection steps will not apply, and you consent to the disclosure, or
- the disclosure is required or authorised by Australian law or a court order.

We may also disclose your personal information (including credit-related 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, 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.

The Consumer Data Right gives you the right to:

- access some of the data (including personal information) held about you by us and by other data holders ('CDR Data');
- consent to an accredited third party accessing your CDR Data held by us; and
- consent to us accessing your CDR Data held by another data holder.

We have a policy about our management of CDR Data. It is available through our website. You can also get an electronic or hard copy from us on request.

5. Sensitive information

Where it is necessary to do so, we may collect personalinformation about you that is sensitive. Sensitive information includes information about an individual's health, and membership of a professional or tradeassociation.

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.

6. Refusal of credit applications

We may refuse an application for consumer credit madeby 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.

If we obtain credit reporting information about you from a credit reporting body and, within 90 days of obtaining that information, we refuse an application for consumer credit made by you (whether alone or jointly with other applicants), we will provide you with a written notice of refusal that tells you the name and contact details of the relevant credit reporting body and other relevant information.

7. Security

We take all reasonable steps including technical and organisational measures, 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.

Your personal information may be held by us in paper or electronic form. 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 unauthorised 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 and personal identification numbers 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 obtainor access to your personal information.

If you do, you may breach the ePayments Code and the termsand 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 keeprecords relating to you), we take reasonable steps to ensure that it is destroyed or de-identified.

8. Website

This section explains how we handle personal information (including credit-related 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 14 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.

If you use a calculator on our website, we might use the information you provide for research or marketing purposes. If you provide contact details in an online feedback form, we will retain a copy of the feedback, including your contact details, but will not use those details for marketing purposes without your consent.

Cookies

A “cookie” is a small text file which is placed on your internet browser or device by your web browser by sites you visit.

When you use our website, mobile app or any other digital service, we may collect information about you including (but not limited to) your preferences, history, location, IP address, activity, location, device information, and what other sites you may have visited. We collect some of this information using cookies, including third party cookies, to improve your experience and communicate with advertisers.

If you continue to use our website or other digital services such as emails and apps, you are consenting to our use of cookies

When you visit the secured pages of our website (i.e. 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, however doing so might prevent you from accessing the secured pages of our website.

Security

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

9. Access

You may request access to the personal information (including credit-related information) that we hold about you at any time from our Privacy Officer whose details are in paragraph 14 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 toa request for access to personal information.

10. Accuracy and Correction

We take reasonable steps to make sure that the persona linformation (including credit-related 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 the information by contacting our Privacy Officer whose details are in paragraph 14 of this Privacy Policy.

11. 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 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 such as market research or direct marketing.

If you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email, you may opt out at any time. 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 whose details are in paragraph 14 of this Privacy Policy, or by ‘unsubscribing’ from our email marketing messages, which always include an unsubscribe option. We will action this free of charge and in a reasonable timeframe.

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, whose contact details are on their website.

12. 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.

13. Questions and complaints

If you have any questions, concerns or complaints aboutthis Privacy Policy, or our handling of your personal information (including credit-related information), please contact our Privacy Officer whose details are in paragraph 14 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 Privacy Officer will investigate further and respond to you.

If an issue has not been resolved to your satisfaction, you can contact external bodies that deal with privacy complaints. These are the Australian Financial Complaints Authority, or AFCA which is our external dispute resolution scheme, or 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

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

Office of the Australian Information Commissioner Post: GPO Box 5288 Sydney NSW 2001
Telephone: 1300 363 992
Website: **www.oaic.gov.au**

14. Privacy Officer

Our Privacy Officer's contact details are:

Address: PO Box 98 Lidcombe NSW 1825
Telephone: 1300 13 22 77
Email: privacy@communityfirst.com.au