

**People's
Choice**

Banking for life

Privacy Policy

Effective 1 March 2023

People's Choice Credit Union, a trading name of Heritage and People's Choice Ltd
ABN 11 087 651 125, Australian Financial Services Licence 244310 and Australian Credit
Licence 244310. In this document, People's Choice Credit Union is referred to as
People's Choice.

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People's Choice Privacy Policy

Heritage and People's Choice Limited ABN 11 087 651 125 (HPC) operates under the trading names "Heritage Bank" and "People's Choice Credit Union". HPC is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (Privacy Act). HPC is also bound by Division 3 of Part IIIA of the Privacy Act, which regulates the handling of credit information, credit eligibility information and credit-related information by credit providers, and the Privacy (Credit Reporting) Code.

This People's Choice Credit Union Privacy Policy (**Privacy Policy**) sets out how HPC, where trading as People's Choice Credit Union, deals with individuals' (**you, your**) personal information (including credit-related information), as well as HPC's legal obligations and rights as to that information. If HPC agrees 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 difference. Information about how HPC deals with information about employees and contractors is in section 15. Any reference to "**us**", "**we**", "**our**", "**People's Choice Credit Union**", or "**People's Choice**" in this Privacy Policy means HPC trading as People's Choice. Any reference to "**HPC**" in this Privacy Policy means HPC trading as Heritage Bank and/or People's Choice Credit Union (as the case may be).

Where we are trading as Heritage Bank a different written privacy policy applies - available at heritage.com.au/privacy-policy and Heritage Bank branches - which sets out how HPC manages personal information (including credit-related information) received by HPC trading as Heritage Bank.

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 you to the extent that you are identified by, or can reasonably be identified from, the information.

Credit eligibility information means information that has been obtained from a credit reporting body, or that has been derived from that information, and is about your credit worthiness including your repayment history information.

Credit information means personal information that, in general, relates to your credit history (refer to section 13 Glossary for a more detailed explanation of this term).

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

2. How will we collect, use and disclose your personal information?

(a) Collection

We will primarily collect personal information about you (including credit information) directly from you or via a method authorised by you (e.g. in an application, over the telephone, face to face, through the mobile banking app or our website). This information will generally come from what you provide in relation to an application for one of HPC's products or services and supporting documentation.

We only ask for personal information relevant to our business relationship with you. When you apply for one of our products, request our services, or agree to act as a guarantor for someone who does, this request may include (as applicable):

- identifying information, like your name, address and other 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 file number;
- your tax residency status and related government issued tax identification number if you are a foreign resident for tax purposes;
- your reasons for applying for a product or service;
- in some circumstances, your personal goals, objectives, and specific needs; and
- any information we are required or authorised to collect by law.

You may decide that you do not wish to provide certain information to us. We will outline the consequences of you not providing such information, although on most occasions it will mean that we will be unable to provide the product or service requested or assess your job application or suitability for a contract with us.

In some circumstances, we may collect personal information (including credit-related information) about you from third parties. For example, if you have applied for a product or service offered by HPC, we may collect personal information about you from third parties such as any referees that you provide, your employer, your accountant, 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 in the credit industry to assist them in managing credit risk, assessing an individual's credit worthiness, collecting debts and other activities. We may obtain credit reports about both borrowers and guarantors. You can 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, using information we obtain from credit reporting bodies, like credit eligibility scoring information.

We may also collect personal information about you in the course of providing products or services to our members.

For example, we may collect personal information about you in the course of processing payments to or from our customer's accounts, if the personal information has been included in the payment details by the person that has initiated the payment.

(b) Use

Where HPC provides products and services to you, we may use your personal information (including credit-related information) for the purposes of providing those products and services, managing our relationships with you, and managing HPC's business. This may include:

- assessing and processing your application for the products and services we offer;
- introducing you to products and services we facilitate on behalf of third parties through our Heritage Bank or People's Choice Credit Union brands;
- to provide you with additional information in relation to existing services or products you already receive from us;
- to update contact details on any database held by us, or for providing services to you;
- sending you surveys or requests for feedback in relation to HPC, our Heritage Bank brand, our People's Choice Credit Union brand and/or any products and services provided by HPC under our Heritage Bank or People's Choice Credit Union brands;
- to inform you about products and services available (refer to section 9 Marketing – for further information);
- to allow you to obtain the unique benefits that are available resulting from you being a customer of HPC, including our marketing newsletters, and offers negotiated by HPC on your behalf;

- to enhance the delivery of products and services HPC provides or may provide you (including conducting research);
- charging, billing, and recovering overdue payments and otherwise protecting the rights of HPC and HPC's representatives;
- to consider any financial hardship requests;
- to undertake securitisation activities;
- to assign debts;
- to assist other credit providers;
- to deal with complaints;
- to meet legal and regulatory requirements;
- maintaining and developing our business systems and the business systems of HPC.

In general, 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, or a purpose requested by you and to which you have consented.

Where we have collected personal information about you in relation to products and services we provide to someone other than you, we may use that personal information for the use for which we collected it.

(c) Disclosure

We may disclose your personal information (including credit-related information) across all HPC brands and to other organisations including HPC's external service providers and contractors, credit reporting bodies and other financial institutions. For a more complete list of the organisations to whom we may disclose your personal information please refer to the definition of Permitted Recipients in section 13 – Glossary.

If we receive your personal information in the course of processing payments to or from a HPC account as part of the payment information, we may disclose that information to our customer or the third-party payer/payee or their financial institution as part of the processing of that payment.

We may disclose your personal information overseas, including credit information and credit eligibility information.

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 referred to under “(b) Use” above. We will take reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

We currently share limited personal information with organisations that are located in the Philippines, India, Ireland, the United Kingdom, China, countries within the European Union, New Zealand, Canada, South Africa, Singapore, Malaysia, Hong Kong, Costa Rica, the United States of America, and such other countries we may disclose to you from time to time.

3. Sensitive information

Where it is necessary to do so, we may collect personal information about you that is sensitive.

Sensitive information includes information about your health, and membership of a professional or trade association.

For example, we may collect health information about you to assess your request for a financial hardship arrangement.

Unless we are required or permitted by law to collect that information, we will obtain your express consent (except where your consent can reasonably be implied from specific nature of our dealings).

4. Refusal of credit applications

We may refuse an application for consumer credit made by you individually or with other applicants. Our refusal may be based on credit eligibility information obtained from a credit reporting body about 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.

5. What if your information is not accurate, up-to-date or complete?

We take reasonable steps to make sure that your personal information (including credit-related information) that we collect, 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 National Contact Centre on 13 11 82 or advise any of our branches.

6. Keeping your information secure

We may hold personal information (including credit-related information) in computer systems, electronic form, digital records, telephone recordings and/or in paper files. We take all reasonable steps to ensure that your personal information (including credit-related information) is protected from:

- misuse, interference, and loss; and
- unauthorised access, disclosure, or modification.

We will also only keep your personal information (including credit-related information) for as long as it is needed (including when we are no longer required by law to keep such records).

When your personal information is no longer needed, we will take reasonable steps to ensure that it is destroyed or permanently de-identified.

7. Can you get access to your personal information held by us?

You may request access to the personal information (including credit-related information) that we hold about you at any time by contacting us. If the request for information relates to information that is readily accessible to us, we will provide it to you immediately. You will need to provide us with sufficient identification before we can allow you access to any personal information.

We will respond to your request for access within a reasonable time. We may recover the reasonable costs of our response to a request for access to personal information. See our Fees and Charges brochure for full details of the costs involved in accessing your personal information.

8. Can we deny you access to your personal information?

Only in limited circumstances can we deny you access to your personal information. 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 us if you would like to challenge our decision to refuse access.

9. Marketing

HPC may use your personal information, including your contact details, to provide you with information about products and services, including Heritage Bank branded products and services, and products and services of third parties, which HPC consider may be of interest to you.

Subject to applicable laws, HPC are permitted to do this while you are a HPC 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 mailing houses and internet service providers.

From time to time we may, subject to applicable laws, phone you for marketing purposes or send you marketing material. We will consider that you consent to this unless you opt out of receiving marketing material from us. At any time you may advise us if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email, phone, SMS, or mail. You may be able to block online advertising by adjusting your internet browser settings. Please keep in mind that we are required to send some information by law. If you don't want us to send you marketing communications, you can update your marketing contact preferences at any time in Internet Banking under the Settings menu or by contacting our National Contact Centre on 13 11 82 or visiting any of our branches.

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 these criteria.

The credit reporting body cannot use information about the type, day of entry, terms and conditions, security, repayment amount, maximum credit limit, repayments history or termination date of your past or current loans 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 will appear on their website.

10. Website and Apps

This section explains how we handle personal information and credit information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us on 13 11 82 as there are other ways for you to provide us with your personal information.

Our website and mobile device applications use Google Maps features and tools provided by Google. Google's Privacy Policy (see [google.com/policies/privacy](https://www.google.com/policies/privacy)) applies to your use of such features and tools.

(a) 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 will be stored.

(b) 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 (i.e. pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit unsecured pages of our website (i.e. 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.

(c) 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, provided by you when you send us an email, will only be used, or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

(d) Security

We use up-to-date security measures on our website to protect your personal information and your credit 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.

(e) 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 or credit information, you will need to obtain a copy of their privacy policy.

11. Changes to this 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 at **peopleschoice.com.au/privacy** and at any of our branches.

12. Privacy questions and complaints

If you have any questions or concerns about your privacy, confidentiality, or access information, contact us on 13 11 82, drop into one of our branches or visit our website. You can also contact us if you believe the privacy of your personal information (including credit-related information) has been compromised, is not adequately protected or if we have otherwise failed to comply with our obligations under the Privacy Act or Privacy (Credit Reporting) Code.

Once a complaint is lodged with us, we will respond to you as soon as possible. We will aim to deal with your complaint at the source of your complaint. We will acknowledge your complaint within 7 days of receipt and unless there are exceptional circumstances our investigations will be resolved within 30 days of receiving your complaint. If you are not satisfied with the response you receive, please let us know and we will investigate further and respond to you.

If you are still not satisfied, you can contact the Australian Financial Complaints Authority (AFCA) which is our external dispute resolution scheme, the Office of the Australian Information Commissioner or, in the case of insurance-related privacy complaints, the Australian Prudential Regulation Authority (all contact details are listed below).

Any 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

Website: www.afca.org.au

Office of the Australian Information Commissioner

Post: GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

(visit this website for further information about privacy laws)

Australian Prudential Regulation Authority

Post: GPO Box 9836, Sydney NSW 2001

Telephone: 1300 55 88 49

Website: www.apra.gov.au

13. Glossary

Credit Information is personal information that includes the following:

- information about you, like your name and address, that we may use to identify you;
- information about your current or terminated consumer credit accounts and, your repayment history including information about whether you make repayments on time and whether your obligations to make those payments has been affected by a financial hardship arrangement;
- 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 from a credit reporting body about you;
- information about you from a credit reporting body;
- information about consumer credit payments overdue for at least 60 days and for which demand has been made;
- advice that payments that were previously notified to a credit reporting body as overdue are no longer overdue;
- information about new credit arrangements you may have made with a credit provider, in relation to consumer credit currently or previously held, to deal with any defaults or serious credit infringement by you;
- information about court judgements which relate to credit that you have obtained or applied for;
- information about you on the National Personal Insolvency Index;
- publicly available information about your credit worthiness; and
- an opinion of a credit provider that you have committed a serious credit infringement of consumer credit provided by that credit provider.

For further detail please see the definition of 'credit information' and other related definitions in the Privacy Act.

Permitted Recipients means:

- our related companies;
- each brand or subsidiary of HPC;
- external organisations that are our assignees, agents or contractors of HPC;
- external service providers to HPC, such as organisations used to verify your identity, to enhance the delivery of products and services or that help identify illegal activities and prevent fraud, payment system operators, mailing houses and research consultants; insurers and re-insurers, where insurance is provided in connection with HPC products and services;
- superannuation funds, where superannuation services are provided to you;
- third party investment platforms, where financial planning services are provided to you;
- other financial institutions, for example, when you apply for a loan from another credit provider, and you agree to us providing information;
- credit reporting bodies, including disclosing that you are in default under a credit agreement or commit a serious credit infringement, if that is the case;
- current or prospective guarantors or security providers in relation to credit applied for or provided to you;
- lenders' mortgage insurers, where relevant to credit that HPC has provided;
- dispute resolution schemes;
- debt collecting agencies, if you have not repaid a loan as required;
- HPC's 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;
- external service providers that assist HPC in managing and storing information related to employees, contractors and job applicants;
- your representative, for example, lawyer, mortgage broker, accountant, financial advisor or attorney, as authorised by you;

- parties involved in what is known as ‘securitisation,’ under which we sell a pool of home loans. These third parties include trustees of securitisation arrangements, lenders mortgage insurers, investors, and their advisers;
- if required or authorised by law, to government and regulatory authorities; or
- any persons, company, body or authority that you have requested or consented to receive your personal information.

14. Disclaimer

This Privacy Policy is provided for the purposes of information only. While we have taken care to ensure that it is accurate and current, we provide no guarantee as to its accuracy or currency. We accept no liability for loss or damage suffered as a result of reliance on the information provided in this Privacy Policy.

15. Our employees and contractors

Where you apply to work with HPC as an employee or contractor, HPC may use your personal information for the purpose of understanding your qualifications, experience and suitability for employment or a contract, and otherwise assessing your application.

HPC collect information in relation to employees as part of their application and during the course of their employment, either from them or in some cases from third parties such as recruitment agencies. This may include information about the employee’s health, their right to work in Australia, or other sensitive information. For some roles, employees may need to provide a criminal history search.

Under the Privacy Act, personal information about a current or former employee may be held, used, or disclosed in any way that is directly connected to the employment relationship. HPC handle employee information in accordance with legal requirements and applicable policies in force from time to time.

Where HPC engage you as a contractor, we use your personal information to manage our working relationship with you, to communicate with you, and for other purposes relevant to the work for which you are engaged.

16. How to contact us

You can contact us in any of the following ways:

- **Telephone:** 13 11 82
- **Website:** peopleschoice.com.au
- **Post:** People's Choice Credit Union
GPO Box 1942, Adelaide S.A. 5001
- **In person:** At any of our branches

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