

Privacy and Credit Reporting Policy (Privacy Policy)

Newcastle Greater Mutual Group Ltd
ACN 087 651 992, Australian Financial Services
Licence/Australian Credit Licence 238273

About this document

This policy explains how we manage and protect your personal information, including your credit-related information, and applies to our customers and any other person we may deal with as part of our business.

This policy also includes our credit reporting policy, so it describes how we manage your personal information in relation to a credit application or credit facility.

This policy covers Newcastle Greater Mutual Group Ltd ('we', 'our' or 'us'), and our related companies and brands, including:

- Newcastle Permanent; and
- Greater Bank.

Sometimes we will update this policy – you can always find the most up-to-date version on our website or request a copy free of charge by visiting any of our branches or by contacting us. Please refer to section 9 for our contact details.

What is personal information?

Personal information is information or an opinion about an individual who is identified or who can be reasonably identified (for example, your name and date of birth).

Credit-related information is a type of personal information. It includes:

- "credit information", which is information that has a bearing on credit that has been provided to you or that you have applied for, including credit for personal, domestic or household purposes and in connection with a business (such as your identification details, information about your account, the type and amount of credit, your repayment history information, such as whether you have made or missed a payment on your credit facility, and financial hardship information if you have entered a financial hardship arrangement);
- "credit eligibility information", which is information related primarily to your credit-related dealings with other credit providers and includes credit reporting information disclosed by credit reporting bodies to us and information we derive from credit reporting information such as our internal credit scores.

Unless stated otherwise, a reference to personal information in this policy is also a reference to credit-related information (referred to as credit information).

Sensitive information is another type of personal information. This is information which is sensitive in nature (for example, your racial or ethnic origin, your political opinions, religious or philosophical beliefs, membership of a professional or trade association or union, and health information).

1. What kind of personal information do we collect and hold about you?

The types of personal information we collect and hold will depend on what business you do with us or the type of product or service you request from us. This personal information may include:

- important information about your identity – for example, your name, residential address, email address, telephone numbers, date of birth, marital status, gender and your employment and occupation details;
- information about your financial position, including your income, expenses, savings and assets;
- credit-related information as defined above, which includes information about your loan arrangements, repayments and credit worthiness;
- your tax file number (TFN) and tax residency status (or your country of taxation obligation and taxation identification number, where applicable);
- financial and transaction information, account or policy information and other information relating to products and services held;
- the reason that you might be applying for a particular product or service;
- records of contact and other correspondence with us, including any feedback, complaint or enquiries you have made;
- your responses to real time surveys or polls seeking feedback on our relationship with you (including to improve our service to you);
- lifestyle information;
- information regarding your personal insolvency or any court proceedings;
- your directorships, other office holdings or shareholdings and similar interests;
- when you visit any of our websites or use our digital banking facilities – your location, device and activity information, IP address and any third party sites you access. For more information about how this works, see the relevant website Terms;
- if you apply for employment with us, information relevant to assessing your application, including your qualifications, employment history, education, referees and health information;
- other information we think is necessary.

In limited circumstances, we may collect and hold sensitive information about you (for example, about your health when you make an application for hardship, when you apply for a life insurance product, or when you apply for employment with us). We only collect sensitive information from you if it is necessary in the circumstances and you have consented to that collection (unless the law does not require us to do so).

Using government identifiers

If we collect government related identifiers, such as your TFN, we do not use or disclose this information unless required by law. We will never adopt a government related identifier as our own identifier for you.

Information we didn't ask for

If we receive your personal information without requesting it, we will decide whether or not we reasonably need this information to provide you with products and services. If so, we will treat the information in the same manner we treat all other personal information gathered about you. If not, we will destroy or de-identify the information.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. We will generally rely on you to assist us by informing us if the information we hold about you is inaccurate or incomplete.

2. How is your personal information collected?

Wherever possible, we collect your personal information directly from you. For example, we will collect your personal information:

- when you submit an application (or other form) to us or provide us with supporting documents or otherwise apply for products or services offered or distributed by us;
- when you deal with us (including when you make an enquiry or complaint);
- when you visit our website; and
- when you enter into a competition we are running or when we sponsor you or an event you are involved with.

We may also collect your personal information when you use our products and services (for example, when you use your account with us to make transactions or repayments).

In some circumstances, we may need to obtain personal information about you from others or publicly available sources. For example, we may collect information about you from:

- our related companies;
- current and/or previous employers (for example, to confirm your employment and income details);
- other credit providers;
- other people associated with your account e.g. co-borrower, joint account holder, guarantor;
- the borrower if you are a guarantor or an additional card holder;
- the account holder if you are an additional card holder;
- publicly available sources of information, such as public registers, social media, LinkedIn and other online networks or platforms;
- your representatives (for example, your legal advisor, accountant, financial advisor, executor, administrator, guardian, trustee, or attorney);
- any referees you provide;
- other organisations who, jointly with us, provide products or services to you (including persons who we arrange or distribute products on behalf of);

- our service providers, such as credit reporting bodies, and companies that provide fraud prevention reports or provide identity verification services; and
- any other person (for example, a spouse or other relative) who holds personal information that we need to provide a product or service to you, and it is otherwise unreasonable or impractical to obtain that information directly from you.

Where you apply for employment with us, we may collect personal information about you from your application and in the course of our recruitment process. In these circumstances, we may also need to collect information about you from third parties, including current and previous employers, nominated referees, educational institutions and when undertaking background checks.

3. Why do we collect, hold, use and share your personal information?

We collect, hold, use and share your personal information so that we can provide products and services to you, and manage or administer our business and our relationship with you. For example, we may collect, hold, use and share your personal information so we can:

- confirm your identity;
- undertake due diligence in relation to you (for example, your tax and employment status) or any security;
- provide you with information about our products and services;
- consider your or a borrower's request for products and services (including to assess your eligibility for a product or service, or to act as a guarantor, signatory, representative or additional card holder);
- process your requests and instructions in relation to products or services;
- derive scores, ratings and evaluations relating to your credit worthiness which we use in our decision-making processes and suitability assessments if you apply for credit;
- carry out your instructions;
- establish, provide and administer the products and services we provide to you;
- process payments and invoices, and collect overdue payments;
- contact you and manage our relationship with you (including dealing with any complaints or enquiries you have made), and improve our service;
- discuss with you (or, where the law allows, a relevant third party such as a relative or carer) any unusual behaviour in relation to your account with us;
- manage our business (for example, to conduct market research, to manage and develop our business systems and infrastructure, and to manage our rights and obligations with third parties);

- tell you about other products or services that may be of interest to you (unless you tell us not to) or run competitions and sponsorship programs;
- consider hardship requests;
- minimise risks and identify illegal activities (such as fraud, money laundering or terrorism financing and other misconduct)
- undertake debt recovery and enforcement activities and deal with serious credit infringements as well as assisting other credit providers to do the same;
- manage legal action you or we are taking;
- develop and plan new products and services, conduct research and analytics, and carry out any internal audits;
- administer and manage any arrangements or dealings you have with us; and
- comply with our obligations under laws, regulations and codes, and assist government or law enforcement agencies. For example, various Australian laws may require or authorise us to obtain information about you, such as:
 - the Anti-Money Laundering and Counter-Terrorism Financing Act and other anti-money laundering legislation (for example, for identity verification and employee due diligence);
 - the *National Consumer Credit Protection Act 2009* (Cth);
 - the *Personal Property Securities Act 2009* (Cth) (for example, if relevant, for search and registration purposes); and
 - the *Taxation Administration Act 1953* (Cth), the *Income Tax Assessment Act 1936* and *1997* (Cth) and other taxation laws and regulations.

Where you apply for employment with us, we may collect, hold, use and share your personal information so that we can assess your application and determine your suitability for any position. This includes verifying your identity, confirming your employment and income details, qualifications, education, training and professional memberships and health information you may provide and arranging for criminal record checks to be conducted.

If your application is unsuccessful or you do not proceed with any position with us, the personal information you provide to us may be retained for future reference should any suitable roles arise. You can opt out of this at any time by telling us.

We may also use or share your information for other reasons where the law allows or requires us to do so (for example, a court, tribunal or external dispute resolution ruling or rule), or for any other purpose you have consented to.

Marketing

From time to time, we may use your personal information to tell you about products or services (including those of third parties) that we think you might be interested in. We will do this unless you ask us not to.

We may contact you by mail, email, telephone, SMS, or any other online, digital or electronic means. We

might also provide your details to other organisations for marketing purposes.

If you are a customer with Newcastle Permanent or Greater Bank, and you no longer wish to receive marketing information from that brand you can:

- click the “Unsubscribe” link in our email marketing messages (which will always include this link); or
- contact Newcastle Permanent or Greater Bank using the details set out in section 9.

4. Business without identifying you

If you do not provide us with your personal information, we may be unable to:

- provide you with the products or services;
- assist or deal with you;
- administer and manage our products or services, or our relationship with you; or
- consider your application for employment with us.

We may freeze your access to a particular product or service, and cancel that product or service, if you do not provide us with information that we reasonably request and need to provide you with that product or service.

If you have a question of a general nature for example, where you make general inquiries about interest rates or current promotional offers, you can choose to do this anonymously or by using a pseudonym – however, we might not always be able to interact with you in this way as there are laws that require us to know who we’re dealing with.

5. Sharing your personal information

Where permitted under the *Privacy Act 1988* (Cth), we may share your personal information with third parties, such as:

- our related companies, assignees, agents, contractors and external advisors (including our accountants, tax advisors, auditors and lawyers);
- your agents, representatives or anyone who acts on your behalf (including your legal adviser, mortgage broker, financial adviser, accountant, parent, guardian, trustee, or referee);
- any person who makes a joint application for a product or service with you;
- any additional card holders, joint account holders or authorised persons;
- businesses and other persons who provide services to us (for example, organisations we use to verify your identity, organisations that assist with research and analytics, payment system operators, payment network operators, organisations that produce cards, cheque books or statements for us, information technology service providers, information technology shared service providers, valuers, quantity surveyors, real estate (including managing) agents and mailing houses);
- other organisations that we arrange or distribute products for or who have referral arrangements in place with us;

- organisations and persons involved in surveying or registering security property or who have an interest in security property;
- your and our insurers or re-insurers, where the insurance is in connection with a product or service we provide to you;
- your current and prospective co-borrowers, guarantors, co-guarantors or security providers;
- the borrower if you are a guarantor;
- your current and/or previous employers (for example, if we need to confirm your employment), or any other person we need to verify your information with;
- credit reporting bodies (including so that your personal information can be included in your credit report and shared with other credit providers that participate in the credit reporting system);
- other credit providers, banks, financial institutions, superannuation funds, and fund managers;
- other organisations, who jointly with us, provide products or services to you;
- debt collection agencies;
- fraud reporting agencies;
- national, state or territory authorities that give assistance to facilitate the provision of our products and services to you;
- any registers that relate to the services we provide (for example, the Personal Property Securities Register);
- entities that help identify and investigate inappropriate or illegal activity, such as fraud;
- statutory authorities (such as the Reserve Bank of Australia), government departments and agencies, external dispute resolution services, any court and law enforcement agencies or regulators;
- entities that obtain an interest in your credit product (or are considering doing so) or that might otherwise be involved in a securitisation and their professional advisors (including investors, trustees, security trustees, managers, lenders' mortgage insurers and rating agencies);
- accredited data recipients, in line with our [Consumer Data Right \(CDR\) Policy](#);
- any other person (such as a relative, guardian, agent, person appointed to manage your affairs or a carer) if we believe that disclosure is necessary to protect us or you, or is otherwise in your interest.

If you have applied for employment with us, we may share your personal details with third parties, including your current or previous employers, nominated referees, organizations that conduct criminal history and background checks, identity verification service providers and third parties involved in, or who assist us with, the recruitment process.

In some circumstances, we may require your consent before being able to share your personal information.

We will take appropriate steps to ensure that organisations we share information with protect your personal information.

Overseas disclosure

Sometimes we need to share your information with overseas organisations which may be located in the countries listed at ngmgrouppaustralia.com.au/privacy. You can also obtain a list by contacting us.

6. Credit checks and credit reporting

When you apply to us for credit or choose to be a guarantor, we may obtain a credit report about you from a credit reporting body. A credit report tells us about your credit history and other credit-related information collected, which we use to assess your creditworthiness.

We may use your credit report to verify your identity, assess applications for credit, assess the suitability of a proposed guarantor for a credit contract, assist in the avoidance of a credit default and the collection of overdue payments and assist with the internal management of credit and pre-screening.

The law limits what information we can give to credit reporting bodies, what they can give to us, and how we can use credit reports.

When you receive credit from us, we share information with a credit reporting body, on an ongoing basis. This information includes:

- your identity;
- the type and amount of credit you have or have applied for – such as credit cards, home loans, or personal loans;
- your credit limit;
- the date your account was opened and/or closed
- your repayment history, including any missed repayments or defaults
- information about any financial hardship arrangement; and
- if you've defaulted, committed fraud or another serious credit infringement.

Credit reporting bodies include this information in their reports to assist other credit providers to assess your credit worthiness. If you would like more information on how credit reporting works in Australia visit the Credit Smart website www.creditsmart.org.au

We can also ask credit reporting bodies to give us your overall credit score, and may use credit-related information from credit reporting bodies together with other information to arrive at our own scoring of your ability to manage credit.

The credit reporting bodies we may deal with are:

- Equifax Pty Ltd
www.equifax.com.au 13 83 32
- Illion Australia Pty Ltd (formerly Dun & Bradstreet)
www.illion.com.au 1300 734 806
- Experian Australia Credit Services Pty Ltd
www.experian.com.au 1300 784 134

You can obtain their privacy policies on their websites.

Direct marketing using your credit-related information

From time to time, we may ask credit reporting bodies to use your credit-related information to pre-screen you

for direct marketing purposes (for example, to determine your eligibility for certain credit products). You can ask a credit reporting body not to use or give your credit-related information in this way. To do so just contact the credit reporting body using the contact details noted on their websites above.

What if you think you are a victim of fraud?

If you believe on reasonable grounds that you have been or are likely to be a victim of fraud (including identity fraud), you can ask a credit reporting body not to use or give your credit-related information to anyone for a 21 day period (unless the use or disclosure is required by law). This is known as the initial ban period. It's a good idea to make requests to each credit reporting body, as you may have a credit report with more than one credit reporting body.

At least 5 business days before the end of the initial ban period, the credit reporting body will get in touch to inform you that you can extend the ban period and explain what information you need to provide to support your allegation of fraud. If you do not make a request to extend the ban period, or the credit reporting body does not believe on reasonable grounds that you have been or are likely to be a victim of fraud, the ban period will end at the end of the ban period.

If you make a request to extend the ban period, and the credit reporting body believes on reasonable grounds that you have or are likely to be a victim of fraud, the credit reporting body must extend the ban period by a period that it considers reasonable in the circumstances and provide you with notice of the extension. The same process will apply for each subsequent ban period.

7. Storage and security

We or third party service providers on our behalf may store your personal information (including if you have applied for employment with us, information collected during the application and recruitment process in accordance with this policy) in hard copy, digital or electronic records. The security of your personal information is important, and we take reasonable steps to ensure that all your personal information is protected from misuse, loss, unauthorised access, modification, or disclosure. Some of the ways we do this are by:

- imposing confidentiality requirements on staff, service providers and other people we deal with;
- training staff on privacy and information security;
- imposing security requirements on document storage and retention;
- monitoring online security systems;
- imposing security measures to control access to premises and systems, such as locks, passwords and permission restrictions;
- using electronic security such as firewalls, data encryption and anti-virus software; and
- if you have applied for employment with us – ensuring your personal information is only accessed by persons (including third parties) involved in, or who assist us with, the recruitment process.

Any personal information that we transmit through our website and internet banking site is encrypted. However,

like all internet communications, we cannot guarantee that information transmitted online is secure. To help protect your privacy, you should ensure that you keep your passwords and personal identification numbers safe, in accordance with the terms and conditions that apply to the account. You must contact us as soon as practicable if your passwords and personal identification numbers are subject to unauthorised access, disclosure or loss.

If we no longer require your personal information (for example, we no longer need your information for business or legal reasons), we will take reasonable steps to ensure that this personal information is permanently de-identified or destroyed.

8. Accessing and correcting your personal information

How to access your personal information

You have the right to request access to personal information that we hold about you at any time, by contacting us using the details set out further below. We will need to confirm your identity and may ask you to fill out a request form.

We may be able to respond to your request immediately, but for more complex cases, it may take us up to 30 days to respond.

Where you request access to your credit-related information that we have received from credit reporting bodies, we will:

- usually provide you access to the information within 30 days; and
- ask you to check with credit reporting bodies what information they hold about you (in order to ensure that you have access to the most up-to-date information).

We don't charge you for asking us for your personal information. However, we may charge you a fee to cover our costs of finding and putting together the material if we give you access – but we'll let you know how much it is likely to be in advance.

If we refuse to give you access to your personal information, for example because we no longer hold the information, access to the information would unreasonably impact on some else's privacy, the request is unreasonable or for legal reasons, we will tell you why in writing and provide you with information about how you can complain about the refusal. You can contact our Privacy Officer (see contact details set out below) if you have any further concerns.

How to correct your personal information

If you believe that personal information we hold about you is inaccurate, incomplete or out-of-date, you have the right to ask us to correct or update the information. You can do this by contacting us using the details set out further below and there is no charge for these requests.

If you're concerned that we have given incorrect personal information to others, you can ask us to let them know about this correction – we'll let you know in writing if we are unable to help.

If the incorrect information was given to us by a credit reporting body (or based on that information), we may need to check with the credit reporting body or the credit provider. We'll aim to help you correct your information within 30 days – however, if we can't help you within that timeframe, we'll ask you for extra time and will explain why it's taking longer.

If we don't think the personal information we have about you is incorrect, we'll explain why we think this in writing and provide you with information about how you can complain. We will notify you of the outcome of a request to correct credit-related information within 5 business days of making our decision.

9. Further information and complaints

We're committed to doing the right thing by our customers. If you have any questions or concerns with regard to our handling of your personal information, let us know and we'll try to fix it.

How you can make a complaint

If you're concerned with our handling of your personal information (including credit-related information) or believe we have breached the Australian Privacy Principles, Division 3 of Part IIIA of the Privacy Act 1988 (Cth) or the Privacy (Credit Reporting) Code 2014, you can make a complaint and we'll look in to it. You can raise your concerns or complaint through any of the below contact methods.

How to contact us

Greater Bank

By mail:

Privacy Office, PO Box 173, Hamilton NSW 2303

By phone: 13 13 86

- Monday – Friday 8am – 6pm
- Saturday 8am – 1pm

By email: customervoice@greater.com.au

Visit our website: greater.com.au

Newcastle Permanent

By mail:

PO Box 5001 HRMC NSW 2310

By phone: 13 19 87

- Monday to Friday 8am – 6pm
- Saturday 9am – 2pm
- From overseas: +612 4907 6501

By email: enquiries@newcastlepermanent.com.au

By Internet Banking: log in and send a secure message

Visit our website: newcastlepermanent.com.au

How will we deal with your complaint?

Where possible, we will address your concern as quickly as possible. In nearly all cases, you can expect your concern will be resolved within 7 days. However, depending on the nature of the issue, in the event it takes us longer than 7 days to resolve or investigate, we'll ensure that you're regularly updated.

If we are unable to resolve your complaint within 30 days, we'll let you know why and, with your written agreement, work out a new timeframe with you.

What happens if you're still not satisfied?

If you're not satisfied with our decision or how we have managed your issue or complaint, 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. Alternatively, if you are not happy with our response to your concerns, you can make a privacy complaint in writing to the Office of the Australian Information Commissioner (OAIC).

Australian Financial Complaints Authority

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678

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

Office of the Australian Information Commissioner

Online: www.oaic.gov.au

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Mail: Office of the Australian Information Commissioner,
GPO Box 5218, Sydney NSW 2001