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# privacy and credit reporting policy.

'ME', 'we', 'us' or 'our' refers to Members Equity Bank Ltd and its subsidiary ME Portfolio Management Ltd.

## about ME

Every Australian deserves to get the most out of their money – and ME is here to help them do it.

But you also deserve to have your personal information protected, which is why we have this *Privacy and Credit Reporting Policy* – a document that outlines exactly how we collect, store and use the personal information and credit information that you give us.

Protecting your privacy involves more than just our own approach. We work with a carefully selected group of third parties including service providers, alliance partners (i.e. super funds, unions, the Co-op and insurers), credit card companies, mortgage aggregators, brokers, retailers and technology and data companies. All of them help us deliver the services we give to you – but because our work with them can involve us sharing your personal information with them, this policy is also about how and when we share that information.

By interacting with us you consent to the collection, holding, use and disclosure of your personal information in the ways we have referred to in this *Privacy and Credit Reporting Policy*.

## our commitment

We collect your personal and credit information so we can offer you the best possible banking experience.

We know it's important that we handle your details carefully, responsibly and securely. You've entrusted us with your personal information, and we'll do everything we can to justify that trust.

Plus, like all Australian banks, we're bound by government legislation like the *Privacy Act* (including the Australian Privacy Principles, Credit Reporting and mandatory data breach notification) and the *Privacy (Credit Reporting) Code*, which lay out how we should treat your personal information.

We must also fulfil our legal obligations to Australian and overseas enforcement bodies including Australian Transaction Reports and Analysis Centre (AUSTRAC).

## definitions

### personal information

Is information or an opinion that can identify someone, including things like name, address, email, address, date of birth, tax file number or driver's licence number.

### credit information

When we talk about 'credit information' in this policy, this includes:

- information about your past experience with us or other lenders
- credit worthiness information
- the kinds of credit products you have or have applied for
- how you have managed your obligations
- information we get from credit reporting bodies in a credit report

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## **the information we collect and hold from you**

Most of the personal information we collect will be directly from you. This could include things like:

- full name and contact details
- information that can identify you, including date of birth, driver's licence number, tax file number, passport details and residence status
- financial information
- responses to market research surveys or competition entries
- your internet banking interactions
- your superannuation information

Where relevant for credit accounts, we may also collect:

- marital status and number of dependents
- credit information (see section headed **credit information** below for more details)
- income and expense details
- details of council rate notices, contracts of sale and property insurance

In some cases, you might need to give us personal information about other people – such as when you have an authorised representative. In those situations, we're relying on you to tell those people that you're giving us their details, and to let them know about this policy.

### **from others**

There are some cases where we might collect personal information about you from other people or organisations, such as our alliance partners, service providers, agents, advisors, brokers, employers or your family members.

For example, if you apply for a credit card or a loan, we might need to collect credit information about you – like a credit report or property valuations.

We may use information we receive about you from our alliance partners, such as insurers, to help us identify and tell you about products and services that may be of interest to you and for administrative purposes. If we previously obtained your consent, we may disclose your personal information to an alliance partner with which we have arrangements. We may do this so that our alliance partners may contact you about other products or services that you may be interested in.

We might also collect information when you visit our website or use our apps, including things like your location, IP address and your activity on our sites. You can find out more about the kind of information we store under the **online data collection** section.

Sometimes we might collect information about you that's publicly available – for example, from things like social media or public registers e.g. Australian Securities and Investments Commission (ASIC), Australian Business Register (ABR).

We'll only collect information in this way, if it is impractical to collect it directly from you, or when we're permitted to do so.

### **sensitive information**

With your permission, sometimes we might collect sensitive personal information including trade union membership, health information for hardship applications, and nationality.

### **when we get information we didn't ask for**

Sometimes we get given personal information that we haven't asked for. If we think this information is needed, we'll keep it securely, just like the rest of your details. Otherwise, we'll destroy or de-identify it.

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## how we use your information

Generally, we'll use your personal information to manage your accounts, and improve the service you get.

Here are some of the specific things we use and share your personal information for:

- verifying your identity\*
- assessing your applications for products or services
- delivering our products and services
- protecting your accounts by detecting and investigating suspected fraud
- assisting with your questions or complaints
- internal operations, such as record keeping, auditing or training
- customer relations including managing our relationship with you, and market or customer satisfaction research, and product development.
- if you are a member of, or you have a product with an alliance partner, we may use your information for the purpose of providing benefits to you or to obtain aggregate information for statistical or research purposes
- marketing products and services which may include pre-screening assessments by a third party
- reporting and data analytics, including for regulatory, management and research purposes
- developing and testing our technology systems
- collecting overdue payments
- supporting financial activities, like securitisation
- complying with our legal and regulatory requirements
- prevent or detect money laundering and terrorist financing
- for any purpose where you have given consent

\* Under the Anti-Money Laundering and Counter-Terrorism Financing Act, ME is obligated to collect your information and verify your identity from particular documents (e.g. passport, driver's licence, birth certificate).

## how we use your information for direct marketing

We're coming up with new products and services all the time, and we'll use or share your personal information to offer you products that we think you might be interested in, including offers from our alliance partners.

There are a few different ways we might make these offers, including direct mail, email, SMS and social media. We may market our products and services to you even after you leave us. If you don't want us to make these offers, get in touch to let us know.

When applicable, you can unsubscribe from electronic marketing that ME, or our alliance partner organisations send you, by using the 'unsubscribe' functionality.

When we market to our prospective customers, we are happy to let them know how we obtained their information, and provide a simple way to opt out.

## sharing your personal information

There are some situations in which we'll share your information with another organisation or person.

Rest assured we only share information with third parties that we believe have the proper systems in place to look after your personal information.

Here are some of the kinds of organisations we might share your personal information with:

### verification services:

- identity verification service providers

### general service providers:

- companies that do things like produce our bank statements or create our marketing
- security and information technology companies that maintain our systems and services

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- mortgage insurers, claim assessors or investigators
  - product planning, research and analysis agencies
  - e-Conveyancing platform providers
  - payment system operators, like MasterCard®
  - loyalty program partners
  - organisations surveying or registering security properties
  - debt recovery agencies and debt purchasers

**advisers:**

- external advisers such as valuers, lawyers or auditors

**government and regulatory bodies:**

- government and regulatory bodies, as required by law
- external complaint resolution bodies

**financial service providers:**

- any person or body in connection with loan securitisation arrangements
- credit reporting bodies
- alliance partners
- other financial institutions or credit providers

**financial crime prevention:**

- law enforcement agencies
- credit providers

**your representatives and guarantors:**

- your authorised representatives or advisers
- people acting on your behalf, such as brokers, advisers, parents, guardians, trustees or people holding power of attorney
- guarantors, including prospective guarantors

**home loan customers**

If you're a home loan customer who requires mortgage insurance, we might share your personal information and credit information with one of the following mortgage insurers:

**Genworth Financial Mortgage Insurance Pty Ltd**

Post GPO Box 3952  
Sydney NSW 2001

Telephone 1300 655 422

Email [gnwmortau.privacyofficer@genworth.com](mailto:gnwmortau.privacyofficer@genworth.com)

Privacy policy [genworth.com.au/privacy-policy](http://genworth.com.au/privacy-policy)

**QBE Lenders Mortgage Insurance Limited**

Post Level 5, 2 Park Street  
Sydney NSW 2001

Telephone 1300 367 764

Email [compliance.manager@qbe.com](mailto:compliance.manager@qbe.com)

Privacy policy [qbelmi.com/pg-QBE-Privacy-Policy-Statement.seo](http://qbelmi.com/pg-QBE-Privacy-Policy-Statement.seo)

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## **outside of Australia**

ME's core bank systems and people are in Australia, but some of the third parties we share personal and credit information with might store or access the information overseas, or be based in other countries.

That means it's possible that your information might end up stored or accessed in overseas countries, including Canada, the USA, New Zealand, the Philippines, Singapore, China, Japan, Hong Kong, India, Malaysia, Papua New Guinea, South Africa, the UK, France, Belgium and Germany.

Of course, we only share information with third parties when we're satisfied they have information security protection in place, whether that's in Australia or overseas.

We also might store your personal information electronically in networked or cloud storage, which could be accessible in countries outside Australia. But as always, we take proper steps to secure and protect your personal information, wherever we're storing it.

## **keeping your information safe**

Whenever we store your personal information or credit information – whether on paper or electronically, we always take proper steps to protect it, as laid out in Australia's privacy legislation. And when we don't need your information any more, we'll destroy, delete or de-identify it.

We do our best to keep you and your information safe, but you should know that there's always a risk of that information being compromised, however small.

Always make sure to keep your personal and login details safe, and educate yourself on the best ways to safeguard your information, e.g. protecting your banking details by avoiding sharing passwords and PINs and keeping up to date with any security material we provide to you.

Keeping your information safe is vital – which is why we get you to verify your identity before you can access or change the personal details we have for you.

## **access, update, or correct your personal information**

We do our best to keep your personal and credit information accurate and up-to-date.

### **accessing your information**

You can access the personal and credit information that we hold about you by calling or writing to us (see **getting in touch**). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time.

There are some situations where we might refuse or limit your access to information, such as when the information is commercially sensitive. If that happens, we'll write to you and let you know why.

### **updating your information**

We do our best to keep your personal and credit information accurate and up-to-date. If any of your details change, such as your name, address or phone number – let us know using internet banking or by calling us on **13 15 63**.

### **correcting your information**

If you need to correct the personal or credit information we hold about you, please contact us (see **getting in touch**). For requests to correct credit information we might need to consult a credit reporting body or another credit provider.

Once we've confirmed your information is inaccurate we'll get your information changed and let you know, ideally within 30 days of your request. If we need longer, we'll get in touch to let you know why, and ask you for more time.

If we find that another organisation has made a mistake regarding your credit information, we can

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help you ask them to correct it. If we correct:

- your **credit information**, we'll tell any other people or organisations we've previously shared the information with (e.g. a credit reporting body);
- any other **personal information**, we'll tell any other people or organisations we've previously shared the information with only if you ask.

If it turns out that we can't change your information, we'll write to you and tell you why.

In general, there are no fees to access or correct your information; but if you ask for a large amount of information, we might charge an administration fee. If that situation comes up, we'll let you know about the fee before we get started on your request.

## resolving your privacy issues or complaints

If you ever have an issue or complaint in regard to your privacy or the way we're using your information, let us know. We'll do our best to resolve it as quickly as we can, generally we'll try to fix the problem within 5 business days.

If you have an issue or complaint about your credit information, it might involve other organisations such as credit reporting bodies or other credit providers. That will generally involve a longer investigation, of up to 30 days. If it looks like it's taking us longer than that, we'll get in touch to let you know why, and to ask you for more time.

### privacy issues and complaint resolution

If you're looking to resolve an issue or complaint about your personal information or credit information with ME, it's best to bring it to us first; most of the time we should be able to resolve it without any problems. Here are the steps to take:

**1. Get in touch with ME directly.**

Call us on **13 15 63** or send us an email using internet banking.

**2. Go to ME's Customer Relations team.**

If you're not satisfied with how we've resolved things, you can contact our Customer Relations team to review your complaint. Just send a secure mail in internet banking, or write to:

**ME Customer Relations  
Reply Paid 1345  
Melbourne VIC 8060**

**3. Contact ME's Privacy Officer.**

If you're still not happy with the way we handled your complaint, you can contact our Privacy Officer by sending an email to [privacy@mebank.com.au](mailto:privacy@mebank.com.au)

**4. Go to an external body.**

If, after following our internal complaint process, you're still not satisfied with the outcome, you can contact an external body - either the Office of the Australian Information Commissioner or the Financial Ombudsman Services.

### Office of the Australian Information Commissioner (OAIC)

If your complaint is about how we handle your personal information or credit information, you can contact the OAIC - call 1300 363 992 or find them online at [oaic.gov.au](http://oaic.gov.au)

### Financial Ombudsman Service (FOS) Australia

If you have a complaint about the products or services we provide you or the way we handle your credit information, get in touch with FOS Australia on 1800 367 287, or go to [fos.org.au](http://fos.org.au)

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## online data collection

Whenever anyone uses our website we collect data about their visit. We use that data for all sorts of things, from improving and maintaining our site's usability and security, or to tailor our marketing. Sometimes advertising agencies are used to track and analyse this data.

Of course, until you log in, or contact us using an online form, any browsing you do on our site is completely anonymous.

We use 1st and 3rd party cookies, web beacons and click stream data in order to gather details of your preferences, behaviour and browser type. This information is aggregated in order for us learn about our customers which can help us provide a better service. Here's some of the general information we collect when you visit our site:

- the website that referred you to ours
- the browser you are using
- the date/time and duration of visit
- what you view and any errors you have while on our site

We use this information to:

- administer and enhance the performance, content and services offered on our website
- improve the effectiveness of our marketing activities, including remarketing our offers on third-party websites
- monitor web traffic
- secure your transactions with us
- remember your preferences and other purposes

You can choose to opt out of the above by visiting the following links:

- [Google Analytics](#)
- [Network Advertising Initiative opt-out](#)

## unfinished applications

If you start but don't finish an online application, we might use the details you've provided so far to get in touch with you or offer help finishing the application.

## browsing security

We do everything we can to keep your information safe while you're browsing our website, but it's also important that you follow good online security at your end of things – like keeping your operating system, browser and anti-virus software up-to-date.

## credit information

Like all banks, we're regulated in the way we use credit information through the government's *Privacy Act* and the *Privacy (Credit Reporting) Code*.

When you apply for or have a credit product with ME, or when you put yourself forward as a guarantor, we'll collect and store credit information, and that information could be shared or used in the future.

The types of credit information we collect and hold includes:

- name, date of birth, gender, address (including prior addresses)
- the kinds of credit products you have or have applied for
- information on credit previously given to you by us or other credit providers, including financial institutions, energy or telecommunications companies
- how you've managed your obligations (which could include details of defaults and repayment history)
- information in a credit report from a credit reporting body



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- information about your credit worthiness that has been derived from a report about you (such as a credit score)
  - details of credit-related court proceedings or insolvency
  - serious credit infringements

## **how your credit information is used and shared**

Your credit information could be used for a few different things, including:

- assessing credit applications or to accept you as a guarantor
- our internal operations, including risk management, securitisation, credit scoring and portfolio analysis
- to help prevent defaults and assist with financial hardship situations
- collecting overdue payments
- in circumstances where we reasonably believe that you have committed a serious credit infringement

Your credit information could be shared with organisations including the following:

- credit reporting bodies
- other credit providers
- any person who has or will act as a guarantor
- debt collection agencies
- any person or body in connection with new or proposed mortgage loan securitisation arrangements
- any person to whom we are considering selling part of our banking business
- the mortgage insurer
- an enforcement body

## **dealing with credit reporting bodies**

When you apply for credit with us, or act as guarantor for someone else, we collect credit information about you from credit reports provided by credit reporting bodies.

Our dealings with the credit reporting bodies are reciprocal, so we might also share credit information with them about your credit accounts, including how well you may manage your repayments.

### **our credit reporting bodies**

We use the three main credit reporting bodies in Australia: Equifax (formerly known as Veda), Experian and Dun & Bradstreet.

If you're interested in their privacy policies, here's where you can get them:

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

## **accessing or correcting your credit information**

To see or correct your credit information go to the **access, update or correct your information** section.

## **resolving credit issues or complaints**

If you're concerned about how your credit information has been handled, or if you have a complaint, check out the **resolving your privacy issues or complaints** section.

## **opting out of pre-screening assessment**

All credit providers can ask credit reporting bodies to use the information they hold about you for pre-screening assessments. If you don't want credit reporting bodies to use your information this



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way, you can ask them not to by getting in touch with them directly.

### **taking action as a victim of fraud**

If you've been a victim of fraud (including identity fraud), or think you might be targeted, you can ask a credit reporting body not to use or share the information they hold about you by getting in touch with them directly.

### **getting in touch**

If you have privacy questions or concerns, or if you want a printed version of this policy, get in touch:

Telephone	13 15 63
Email	privacy@mebank.com.au
Post	The Privacy Officer - ME GPO Box 1345 Melbourne VIC 3001

### **notifying you**

When you give us personal information, we'll let you know why we're collecting it, and how we might use or share it. We'll also tell you how you can check your information or correct it, and how you can make a complaint.

### **changes to this policy**

This policy is effective as of 28 March 2017. As with all our policies, we'll review and update it, and any amendments will apply to all the information we hold at the time of the update. We will post the updated policy on our website and we encourage you to check this page from time to time.