

ANZ Privacy Policy

PROTECTING YOUR PRIVACY | 12.13



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Introduction to ANZ's Privacy Policy

Protecting your privacy

Protecting your privacy and the confidentiality of your personal information is fundamental to the way ANZ does business.

As a banking and financial services organisation, ANZ has a long history of handling personal information, including sensitive information, confidentially. We value the ongoing trust you have in us to protect your privacy.

Personal information is information or an opinion about you.

This Privacy Policy explains how ANZ will manage and protect your personal information, including information that ANZ collects during the course of providing a product or service to you and the information ANZ holds after your product or service is terminated (where we are required to hold this information or it is necessary for our functions). This Privacy Policy also applies to information that ANZ collects from third parties including the information ANZ receives through the credit reporting system. You can find specific information about ANZ's credit reporting practices on page 11.

This Privacy Policy contains information about how you can access the information ANZ holds about you (page 16), how you can ask ANZ to correct your information (page 17) and how you can make a complaint if you have concerns about how ANZ has managed your information (page 18).

Which ANZ entities does this Policy cover?

All ANZ entities are subject to strict standards in relation to the handling of personal information, regardless of where those entities are located.

This Privacy Policy applies specifically to Australia and New Zealand Banking Group Limited and each of its wholly-owned Australian subsidiaries (ANZ). It explains how your personal information is managed in our Australian-based businesses including ANZ, Esanda, E*TRADE, One Path and ANZ Trustees.

The section on Credit Reporting also constitutes the credit reporting Privacy Policy for the following

offshore related entities which conduct operational, technology and customer service functions on behalf of Australian-based ANZ businesses:

- ANZ Support Services India Private Limited (*India*)
- ANZ Operations and Technology Private Limited (*India*)
- ANZ Global Services and Operations (Manila), Inc. (*The Philippines*)
- ANZ Pacific Operations Limited (*Fiji*)
- ANZ Global Services and Operations (Chengdu) Company Limited (*China*)

How to contact ANZ

If you have any questions or would like more information about this Privacy Policy you may contact the person, department or branch that you normally deal with. Alternatively, you may call the ANZ Australian Contact Centre on 13 13 14 at any time or email your question or request to yourfeedback@anz.com.

Our privacy framework

ANZ is bound by the Privacy Act and the 13 Australian Privacy Principles (APPs) set out in that Act. The APPs regulate the way that certain entities handle personal information.

As a participant in the credit reporting system, ANZ is also bound by the rules in the Privacy Act which apply to credit reporting. More information about ANZ's credit reporting practices can be found on page 11.

The Privacy Act does not apply to the handling of information that does not relate to individuals – for instance information about corporations.

Collecting your personal information

ANZ collects your personal information so that we can perform our various functions and activities. ANZ also collects your personal information if the law requires us to collect it.

If ANZ does not collect your personal information, we may not be able to deal with you, or provide you with a product or service.

ANZ collects most personal information directly from you. For example, you provide us with your information when you open an account, fill in an application form, deal with us over the telephone, send us a letter, use our websites or visit a branch.

If you apply for one of ANZ's products or services, ANZ may collect and hold information from you such as your name, address, telephone number, e-mail address, tax file number (TFN), date of birth, annual income and other financial details, place of work, credit history, and your transaction history.

Collecting information from third parties

ANZ may also collect information about you that is publicly available, including information from telephone directories, the electoral roll or other websites.

There may be occasions when ANZ collects personal information about you from a third party. For example, ANZ may collect personal information from:

- **credit reporting bodies** if we request a report about your credit history (more information about ANZ's Credit Reporting practices can be found on page 11);
- **other credit providers** if we request information from them about the products they provide to you;
- **organisations that ANZ has an arrangement with to jointly offer products and/or has an alliance with to share information for marketing purposes** to provide you with products or services and/or to promote a product or service;
- **our related entities** so we can better manage your relationship with all ANZ companies;
- **marketing companies** if we acquire contact information to tell people about ANZ products and services that may interest them; and

- **brokers and other parties who may have introduced you to ANZ.**

ANZ may also collect information about how you use ANZ's and other websites to help us better tailor our services to you. For example, ANZ may do this when you click on a link from an ANZ website or visit a website which displays an ANZ advertisement. Usually, the information we collect in this way is general information only derived from cookies – such as the number of visitors to a site or statistics about how a site is browsed – and does not identify you. If ANZ does identify you with this information (for example, if you have been logged onto an online ANZ service), any use or disclosure of that information will be in accordance with this Privacy Policy.

Collecting sensitive information

Sensitive information is personal information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, genetic information or health information.

ANZ will not collect, use or disclose sensitive information about you unless we need the information for one of our functions or activities and we have your consent (or we are legally required to do so).

For example, ANZ's OnePath business collects health information from you and your medical practitioner with your consent to assess your application for life insurance, to administer your policy and assess any claim made under that policy. OnePath may also collect information about you if your family members apply for products such as OnePath's life insurance or trauma and disablement cover.

OnePath may also collect sensitive information through customer surveys or questionnaires so that it may obtain your feedback and provide further information to you about OnePath products or services. More information about ANZ's marketing practices can be found on page 15.

Collecting information required by law

ANZ may collect information from you because we are required or authorised by an Australian law or court or tribunal order to collect that information.

We will tell you if collection is required or authorised by law and provide you with details of the law, court or tribunal order.

For example, when you open a deposit account or take out a loan, ANZ is required under the Anti-Money Laundering and Counter-Terrorism Financing Act to collect certain information from you to prove your identity, such as your driver's licence or passport details.

ANZ may collect your Australian tax file number (TFN) when you open a deposit account. It is not compulsory to provide your TFN, but if you do not, ANZ may deduct withholding tax from your interest payments at the highest marginal rate. ANZ will only collect your TFN to determine whether you are subject to withholding tax on any interest payments you receive and for no other purpose. ANZ's OnePath business is authorised by the Superannuation Industry Supervision Act 1993 to request that you provide your TFN. If ANZ collects your TFN, we will handle your TFN in accordance with the Privacy Act and Guidelines issued by the Commissioner.

The National Consumer Credit Protection Act 2010 requires credit providers like ANZ to make inquiries into the financial situation, needs and objectives of individuals who apply for consumer credit. This is to ensure the credit provider has the information - such as the individual's financial commitments, income and liabilities - to make an informed decision about whether the individual can afford the credit they are applying for.

ANZ may also be required to ask about your tax residency status under taxation information sharing agreements the Australian Government has in place with other countries. For example, a tax treaty between Australia and the United States formed under US law (Foreign Account Tax Compliance Act) requires ANZ to ask account holders of some types of products whether they are US citizens or US tax residents when they open their product. If you are a tax resident of another country, the relevant treaty or law may require us to collect your relevant foreign tax identification number.

Using your personal information

We may use and disclose personal information we collect about you for several purposes including:

- to consider your request for a product or service;
- to enable ANZ to provide a product or service;
- to tell you about other products and services that may be of interest to you;
- to assist in arrangements with other organisations (such as loyalty partners) in relation to the promotion or provision of a product or service;
- to manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, collecting debts and market or customer satisfaction research);
- to consider any concerns or complaints you raise against ANZ and/or to manage any legal action between you and ANZ;
- to prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- to identify you or establish your tax status under any Australian or foreign legislation, regulation or treaty pursuant to an agreement with any tax authority; and
- as required by relevant laws, regulations, codes of practice and external payment systems.

Disclosing your personal information overseas

ANZ may need to disclose your information to organisations located overseas. Most of these overseas organisations are service providers, including related entities, which perform a range of technology, operational and customer service functions on ANZ's behalf (ANZ's operational hubs). We only disclose your information to ANZ's operational hubs when it is necessary for the services they provide ANZ.

These entities are located in the following countries:

- The Philippines
- China
- India
- Fiji
- New Zealand

ANZ may also disclose your information to other overseas related entities (including our offshore businesses) for the purposes explained in our Privacy Policy. For example, if you have, or are considering acquiring, a product or service from an overseas ANZ entity, ANZ may disclose your personal information to that entity.

When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia.

In some circumstances, the nature of the product or service you request may require ANZ to disclose your information overseas. For example, if you request to transfer funds to an overseas account using a telegraphic transfer, ANZ will be required to disclose your information to overseas banks that are involved in making the payment.

If ANZ discloses information that we have received through the credit reporting system to ANZ's operational hubs, they will use and disclose that consistent with ANZ's credit reporting practices described in the section titled Credit Reporting on page 11.

Credit reporting

About credit reporting

ANZ participates in the credit reporting system. If you apply for credit from ANZ, we may request a credit report about you from a credit reporting body. These credit reports contain information which assists us to assess your application, including information about your credit history with other credit providers. Credit reporting bodies can provide credit providers with credit reports in certain circumstances, including when an individual makes an application for credit, or when a credit provider is seeking to help an individual avoid defaulting on their credit. Credit reports are designed to assist credit providers to accurately assess an individual's ability to repay credit.

To request a credit report, ANZ will provide information to the credit reporting body that identifies you, as well as information about your application – including the type and amount of credit you are applying for.

In addition to collecting information about your credit history from a credit reporting body, we also collect this type of information through your use of ANZ products. For instance, we collect information about the credit you hold through ANZ and how you make repayments on those credit products. We collect this information to help manage the product you hold with ANZ. For example, ANZ may use this information to determine whether you need assistance to meet your repayment obligations.

Some of this information about the credit you hold with ANZ is disclosed to a credit reporting body so it can be included in your credit report and shared with other credit providers that participate in the credit reporting system.

ANZ will also need to assess your eligibility if you nominate to be a guarantor for another person. This may involve ANZ obtaining information about you from a credit reporting body and reviewing information we already hold about you.

Occasionally, ANZ may collect your credit information directly from other credit providers, including other banks. ANZ will collect information from other credit providers with your consent or if that credit provider and ANZ are jointly providing credit to you.

Disclosing your information to Credit Reporting Bodies

Under the Privacy Act, credit providers can disclose certain information about your credit history to credit reporting bodies. ANZ participates in credit reporting so that ANZ is able to obtain information to make better and more informed decisions about providing credit to individuals. The Privacy Act restricts the purpose for which credit providers can access and use information that is held by credit reporting bodies.

ANZ may disclose the following information about your credit to credit reporting bodies:

- that ANZ provides you credit;
- the type of credit you hold;
- the amount of credit provided to you;
- the terms and conditions of your credit; and
- when your credit account is opened and closed.

We may also disclose how you repay your credit. If you fail to make repayments on your credit or you default on your obligations, ANZ may report this information to a credit reporting body. Equally, ANZ will inform a credit reporting body if you make repayments on time or if you have corrected a default.

We may also tell a credit reporting body if you commit a serious infringement (for example, fraudulent behaviour or deliberately seeking to evade your repayment obligations).

ANZ discloses information to the following credit reporting bodies:

Veda Advantage Information Services and Solutions Limited

Phone: 1300 850 211

Mail: Veda Information Services & Solutions Ltd
PO Box 964
North Sydney NSW 2059

E-mail: Membership.query@veda.com.au

Web: www.mycreditfile.com.au

Dun and Bradstreet (Australia) Pty Ltd

Phone: 1300 734 806

E-mail: PACAustral@dnb.com.au

Web: www.checkyourcredit.com.au

Experian Australia Credit Services Pty Ltd

Phone: 1300 784 134

Mail: Experian Australia Credit Services Pty Ltd
PO Box 1969
North Sydney NSW 2060

Web: www.experian.com.au/credit-services/credit-services.html

Each of these credit reporting bodies is required to have a policy to explain how it manages your personal information. You can contact these credit reporting bodies directly to request a copy of their privacy policy or for more information about the way they manage your personal information.

Using information collected through the credit reporting system

If ANZ collects credit information about you through the credit reporting system, ANZ will use that information for several purposes, including:

- to assess your application for credit;
- to assist you to avoid defaulting on your credit obligations;
- to assess your suitability to act as a guarantor;
- to manage accounts and carry out general administration and operational tasks for ANZ Group (for example, risk management, development of systems, systems testing, market and customer satisfaction research, staff training, credit scoring and collecting debts); and
- as required by relevant laws, regulations, codes of practice and payment systems.

ANZ will often combine the information obtained from a credit reporting body with information ANZ already holds about you. For instance, when ANZ assesses your application for credit, we may combine information about other products you hold (including how much you hold on deposit and how you have repaid existing ANZ credit), the information you provide on your application form and the credit report we obtain from a credit reporting body to calculate a rating or score, which will determine whether you qualify for the credit you are applying for.

Disclosing your credit information

When you apply for credit with ANZ, we seek your consent to disclose your personal information, including the information we receive through the credit reporting system, to third parties. The terms and conditions of your product or service will identify who ANZ discloses your information to.

ANZ may disclose information it receives through the credit reporting system to related entities of ANZ (who use and disclose the information in the same way), agents and contractors or service providers (such as debt collection agencies), other credit providers (for them to assess credit or investigate suspected fraud), mortgage insurers and your guarantors. ANZ may also disclose this information when required or authorised to do so by law including when ANZ is required to disclose this information to regulatory bodies, government agencies and law enforcement bodies or courts.

Fraud

If you believe you have been, or are likely to be, a victim of fraud (for example, because you discover someone else is applying for credit in your name), you have a right to request credit reporting bodies not to use or disclose credit reports they hold about you. You can do this by contacting them directly.

If you make such a request, a credit reporting body will not disclose information about you for 21 days. You can request an extension to this period if you believe you are still, or still likely to be, a victim of fraud.

Managing your credit information

ANZ manages credit information that we have collected about you through the credit reporting system in the same way we manage all other personal information about you.

This Policy provides information about: how you can seek access to the credit information that we hold about you, including information that we have obtained from credit reporting bodies or other credit providers (page 16); how to seek correction of this information (page 17); and how to make a complaint if you believe your privacy has been interfered with (page 18).

If ANZ discloses information that we have collected through the credit reporting system to our operation hubs overseas, those hubs will manage that information in accordance with this Privacy Policy.

Your consent is important

ANZ may require your consent to use and/or disclose your information in particular ways.

For instance, we need your consent before we can obtain a credit report from a credit reporting body to assess an application for commercial credit.

Likewise we need your consent if we need to use your information for a purpose that is not related to the purpose for which we collected your information in the first place.

Depending on the circumstances, this consent may be express (for example, you expressly agree to the specific use of your information by ticking a box) or implied by some action you take or do not take (for example, your agreement is implied by the fact that you have agreed to your product terms and conditions which contains information about the use or disclosure).

Marketing and privacy

As part of ANZ's service to you, ANZ may use personal information we have collected about you to identify a product or service that may benefit you. ANZ may contact you from time to time to let you know about new or existing products or services. ANZ may also disclose your personal information to its related entities or business partners to enable them or ANZ to tell you about a product or service.

You can contact us at any time if you do not want to receive marketing information from ANZ (see page 5 for our contact details).

ANZ will not use any information that we have received through the credit reporting system for marketing purposes. However, for some products, ANZ may ask a credit reporting body to use the credit information they hold to identify individuals that are eligible for an ANZ marketing offer. If you are eligible you may be sent an offer on our behalf. You should contact credit reporting bodies directly if you do not want them to use your information in this way.

Managing your personal information

ANZ protects your information

ANZ protects your personal information from misuse and loss. We also protect it from unauthorised access, modification and disclosure by ensuring that your personal information can only be accessed by people properly authorised to have access.

ANZ may store your personal information in hardcopy documents or electronically. ANZ maintains physical security, such as locks and security systems, over our paper and electronic data stores and premises. ANZ also maintains computer and network security. For example, ANZ uses firewalls (security measures for the internet) and other security measures such as identification codes and passwords to control access to computer systems. ANZ continually maintains and monitors its online security systems to ensure that ANZ's online banking services are secure and that your personal information is appropriately protected when you use these services.

Protecting your privacy

You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change.

We require you to keep your personal identification number (PIN), passwords and access codes confidential and secure at all times. This means that you should not disclose your PIN, passwords or access codes to any other person. You should contact ANZ immediately if you believe that your PIN, passwords or access codes may have been disclosed to another person or if you would like to change your PIN or password.

How do I access my personal information?

Subject to some exceptions, you can find out what personal information ANZ holds about you, including what information we have obtained through the credit reporting system.

You should contact ANZ if you wish to find out about the personal information an ANZ company holds about you (see page 5 for our contact details).

We will need to verify your identity before giving you access.

We will normally be able to deal with your request immediately. If the request is complex, we will ask you to complete a personal information request form. We can usually deal with such a request within 14 to 30 days.

Depending on the complexity of your request, we may charge a fee for processing the request. Please refer to our fees and charges booklets for our standard fees and charges.

ANZ will usually provide access to your information at the branch or office closest to you in order to protect the confidentiality and security of your information. However, you may elect to receive your information by registered mail or courier, where practicable.

In certain circumstances, ANZ may not be able to tell you what personal information is held about you. In these circumstances, we will write to you to explain why we can not provide you with the information and attempt to find alternative means to enable you to access your information.

How do I request correction of my information?

If you believe that the personal information we hold is inaccurate, incomplete or out-of-date, you should contact us.

We will promptly update any personal information that is inaccurate, incomplete or out of date. If you ask ANZ to correct information that we have received through the credit reporting system or information we have previously disclosed to credit reporting bodies, we will consult with other credit reporting bodies and credit providers about the accuracy of your information, as necessary. If we do not agree that your information is inaccurate, incomplete or out of date, we will write to you and tell you the reason(s) why we do not agree with you. We will also tell you what you can do if you are not satisfied with our response.

Resolving your concerns

You are entitled to complain if you believe that your privacy has been compromised or that ANZ has breached the Privacy Act, or an applicable code.

If you have a privacy complaint, you can contact the person, ANZ company department or branch that you have been dealing with. Alternatively, you can lodge a complaint online at www.anz.com or contact our Customer Response Centre. The Customer Response Centre's contact details are:

Phone: 1800 805 154 (8am – 7pm AEST weekdays)

Mail: ANZ Customer Response Centre
Locked Bag 4050
South Melbourne VIC 3205

Fax: 1800 269 030

E-mail: yourfeedback@anz.com

If your complaint is not satisfactorily resolved, you may also contact the ANZ Customer Advocate, which provides an independent and impartial approach to the review of complaints. The Customer Advocate is independent from ANZ businesses and complaints teams and reports direct to the CEO (Australia).

The Customer Advocate's contact details are:

Phone: (03) 8654 1000

Mail: ANZ Customer Advocate
Level 7A
833 Collins Street
Docklands VIC 3008

Fax: 1800 117 651

E-mail: CustomerAdvocate@anz.com

Managing your complaint

If you make a complaint, ANZ will respond within 48 hours to let you know who is responsible for managing your complaint. ANZ will try to resolve your complaint within 10 working days. When this is not possible, ANZ will contact you within that time to let you know how long we will take to resolve your complaint.

ANZ will investigate your complaint and where necessary, consult with other credit providers or credit reporting bodies about your complaint. ANZ will make a decision about your complaint and write to you to explain our decision.

If your complaint is not satisfactorily resolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. When we write to you about our decision, we will explain how you may access an external dispute resolution scheme or make a complaint to the OAIC.

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