

Dnister Credit Co-operative Limited (Dnister) (ABN 59 087 651 394) ('we', 'us', 'our') respects the privacy rights of our members and is bound by:

- The Privacy Act 1988 (Cth) (Privacy Act),
- The Australian Privacy Principles,
- The Credit Reporting Privacy Code, and
- The privacy and confidentiality provisions contained in the Customer Owned Banking Code of Practice

As a financial services organisation, Dnister, including its associated businesses, has a long history of handling personal information confidentially. We treat very seriously the ongoing trust you have in us to protect your personal information.

We have systems and procedures in place to protect your privacy whenever we collect, store, and use or disclose your personal information.

The Dnister Privacy & Credit Reporting Policy explains how we protect your privacy, including:

- the importance of your consent before we disclose your personal information to third parties;
- how we respect your privacy in the course of using your personal information; and
- how your privacy is protected when you access our websites via the Internet.

This Privacy & Credit Reporting Policy (Policy) outlines how we manage your personal information and credit-related information, as well as our legal obligations and rights as to that information.

You have the right, where it is lawful and practicable, of remaining anonymous when entering into transactions with Dnister. However, should you choose to remain anonymous we may not be able to provide you with our products and services.

1. Key types of information we collect and hold

We will collect and hold:

- Personal information to identify you, i.e. your name, address and date of birth.
- Your tax file number (TFN).
- Information about your financial position, like your income, expenses, savings and assets and any (other) credit arrangements.
- Credit information from credit reporting bodies.
- Your employment details.

We will only collect information that is related to our providing, or arranging others to provide:

- banking products and services
- financial advisory services
- financial accommodation
- general insurance
- travel services.

2. How we collect your personal information

Wherever possible, we will collect personal and credit-related information directly from you. This information will generally come from what you provide in your application for one of our products or services and supporting documentation.

We only ask for personal information relevant to our business relationship with a member and our products or services you apply for.

We may also collect personal information and credit-related information about you from third parties, such as any referees that you provide, your employer, other credit providers and third party service providers including credit reporting bodies.

Credit reporting bodies collect credit information about individuals which they provide as credit reports to credit providers and others in the credit industry to assist them in managing credit risk, collecting debts and other activities. You can also ask a credit reporting body, through contact details on their website, not to use or disclose your personal information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud.

Some information is created through our internal processes, like credit eligibility.

3. Use of your personal information

We may use your personal and credit-related information for the purpose of providing products and services to you and managing our business. This may include:

- assessing and processing your application for the products and services we offer
- establishing and providing our systems and processes to provide our services to you.
- executing your instructions
- charging and billing
- uses required or authorized by law
- maintaining and developing our business systems and infrastructure
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems, or
- direct marketing with your consent, and subject to your rights to unsubscribe or opt-out.

In general, we do not use or disclose your personal and credit-related information for a purpose other than:

- a purpose set out in this Policy
- a purpose you would reasonably expect
- a purpose required or permitted by law, or
- a purpose otherwise disclosed to you to which you have consented.

4. Your consent is important

Your consent can be express or implied. Your express consent can be verbal or written; for example when you sign an application for a loan you are giving your express consent for us to obtain a credit reference about you from a credit reporting agency.

You imply consent when we can reasonably conclude that you have given consent by some action you take, or when you decide not to take action. For example, if you use our internet banking service and continue the process by acknowledging and accepting the terms and conditions by clicking the "I accept" button, you have given us your implied consent for the use of the service.

We rely on your implied consent to use and disclose identifying information about you to Dnister's service providers, such as disclosing your name and account number to a printer to personalize your cheque book. Naturally, the confidentiality of your personal information is still maintained.

If you do not consent to certain uses of personal information, we may not be able to provide you with a particular product or service.

5. Unsolicited information

Where you provide us with unsolicited personal or sensitive information, we may use this information to determine your eligibility for our products and services. We may choose to de-identify and destroy this information if we consider it is not relevant or otherwise not required to be retained by us in accordance with the law and where it is otherwise reasonable to do so.

6. Disclosure of your personal information

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

- external organisations that are our assignees, agents or contractors
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants
- insurers and re-insurers, where insurance is provided in connection with our services to you
- 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
- lenders' mortgage insurers, where relevant to credit we have provided
- debt collecting agencies, if you have not repaid a loan as required
- our professional advisers, such as accountants, lawyers and auditors
- your representative, for example, lawyer, mortgage broker, financial adviser or attorney, as authorised by you, or
- if required or authorised by law, to government and regulatory authorities.

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and privacy obligations with respect to the protection of your personal information.

Overseas disclosures

We only disclose identification information overseas for the purposes of facilitating international funds transfers, when requested by you. We do not disclose personal information overseas for any other reason.

7. Sensitive information

Only where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information about your individual health, and membership of a professional or trade association.

Unless we are required or permitted by law to collect that information, we will obtain your consent. However, if the information relates directly to your ability to meet financial obligations that you owe to us, you are treated as having consented to its collection.

All employees sign confidentiality agreements as a condition of their employment at Dnister.

8. 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 either you, another applicant or another person proposed as guarantor.

9. Security

We take all reasonable steps to ensure that your personal and credit-related information held on our website or otherwise, is protected from:

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

We maintain physical security over our paper and electronic data stores and premises, such as locks and security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems.

We ask you to keep your passwords and personal identification numbers safe, in accordance with our suggestions.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we take reasonable steps to ensure that it is destroyed or de-identified.

10. Website & Electronic Correspondence

This section explains how we handle personal and credit-related information collected from our website.

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 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.

Security

We use up-to-date security measures on our website to protect your personal and credit-related information. Any data containing personal, credit or related information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

Links on our website

Our website may contain links to third party websites. The terms of this 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. Access

You may request access to the personal and credit-related information that we hold about you at any time from our Privacy Officer whose details are in section 16 of this Policy.

We will respond to your request for access within a reasonable time. If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can contact our Privacy Officer if you would like to challenge our decision to refuse access.

We may recover the reasonable costs of our response to a request for access to personal information.

12. Accuracy

We take reasonable steps to make sure that the personal and 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 customer service teams or our Privacy Officer.

If you find that current personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will correct it.

13. Marketing

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you.

We will consider that you consent to this, unless you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email. In order to do so, you will need to request that we no longer send marketing materials to you. You can make this request by contacting our Privacy Officer or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

14. Changes to the Policy

We may make changes to this Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Policy is available on our website.

15. Questions and complaints

If you have any questions, concerns or complaints about this Policy, or our handling of your personal and credit-related information, please contact our Privacy Officer. You can also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible. We will deal with your complaint under our internal dispute resolution procedure. We will provide you with our Dispute Resolution Guide. If you are not satisfied with the response you receive, please let us know and our Privacy Officer will investigate further and respond to you.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints. These are Credit Ombudsman Service Limited, our external dispute resolution scheme, and the Federal Privacy Commissioner. Either of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

Credit Ombudsman Service Limited (COSL)
GPO Box A252 South Sydney NSW 1235
Telephone: 1300 555 727
Website: www.cosl.com.au

Federal Privacy Commissioner
GPO Box 5218 Sydney NSW 2001
Telephone: 1300 363 992
Website: www.oaic.gov.au

16. Privacy Officer

Privacy Officer's contact details are:

The Privacy Officer
Dnister Ukrainian Credit Co-operative Ltd
P.O. Box 279,
Essendon VIC 3040
Telephone: 1300 363 041 (during normal business hours) Email: info@dnister.com.au

17. Disclaimer

This 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 Policy