



Hunter United Employees' Credit Union Ltd

ABN 68 087 650 182

Privacy Policy

Hunter United Employees' Credit Union Ltd, (herein referred to as "Hunter United", "we"), recognise the importance of your privacy, and are committed to protecting personal information about you that we hold. This Privacy Policy describes how we manage your personal information and safeguard your privacy.

Date Last Reviewed

- Audit Committee: 25th January 2008
- Board Meeting: 25th January 2008

1. NATIONAL PRIVACY PRINCIPLES.

From 21 December 2001, most private sector organisations in Australia must by law comply with the National Privacy Principles ("NPPs"). The NPPs strengthen protection of your privacy. We will comply with the NPPs from that date.

This Privacy Policy explains,

- [How we collect personal information about you.](#)
- [How we use and disclose your personal information.](#)
- [Security of your personal information.](#)
- [How we provide access to your personal information.](#)
- [How you can contact us for further information.](#)
- [What happens when we change our policy.](#)

2. COLLECTING PERSONAL INFORMATION ABOUT YOU.

We hold only those kinds of personal information that are necessary for us to perform our functions. This in turn depends upon the type of product or service you request from us. It may include:

- 2.1 Information you give us when you apply for or request a product or service from us. The information will include, but is not limited to, your name, address and contact details. From time to time we may also request additional personal information from you in order to meet legal requirements and to also ensure that we offer you the most appropriate products and services for your circumstances. If you fail to give us the information we ask for, we may be unable to process your request for a product or service.
- 2.2 Financial information about you, such as your financial position. We will only hold information obtained from credit checks if you have authorised us to carry out those checks.
- 2.3 Communications between you and us.
- 2.4 Transactional information about a product you have or have had with us
- 2.5 Information collected when using our website. The information that we will collect about you will depend on how you use the facilities offered by our website.

If you visit an unsecured area of the website (that is, an area where you are not required to log on) to read, browse or download information, our system will record the date and time of your visit to our site. We may also record the pages viewed and any information that you download.

Our systems will not record any personally identifiable information, neither will personally identifiable information be retained for any purpose including later matching with other information.

Our website offers a number of interactive facilities including tools such as loan calculators, as well as on-line enquiry forms. If you use any of the tools such as the

loan calculator we do not capture any information that you may enter when using these tools.

If you decide to complete an on-line enquiry form the information that you enter into the on-line form will only be collected by us if you submit the enquiry. If at any stage you log out prior to submitting your enquiry, the information you have entered up to that point will be automatically deleted.

Our website also contains links to the websites of third party providers of goods and services ("Third Party websites"). If you have accessed Third Party websites, through our website, and if those third parties collect information about you, we will not collect or have access to that information as part of any arrangement with those third parties.

Third Party websites should contain their own privacy statements. We strongly recommend that you acquaint yourself with the privacy statements of those Third Party websites before using their facilities completely.

2.6 "Cookies".

A "cookie" is a small text file placed on your computer by our web page server. Our web-page servers can later retrieve a cookie. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by setting your preferences and options in your browser.

We use "cookies" as a fundamental part of our interaction with your Internet browser. The purpose is to provide you with better and more customised service and with a more effective website.

There are two general types of cookies, permanent and session.

- Permanent cookies stay on your machine for future use after you have finished visiting a website – these are usually used to identify you or to customise the services offered to you the next time you visit.
- Session cookies only last for the time that you are actually visiting a website and are then destroyed – common uses for session based cookies are for passing information or "context" from one screen to another or to aid in security issues.

We only use session based cookies and these are only in the secure banking area of the website. We use them to retain context information about yourself and to provide information regarding the types of transactions that you conduct in the banking area of the site. We store information on the types of banking services that you use for audit trail purposes and no other.

The secure banking area of our website can only operate by using this type of cookie. Accordingly, if you wish to make full use of this area of our website, it is required that you accept cookies.

2.7 How We handle E-mail

We will preserve the content of any e-mail that you send us, if we believe that we have a legal requirement to do so. Our employees for security purposes, including where e-mail abuse is suspected, may monitor the content of e-mail messages. As well our response to you may be monitored for quality assurance issues.

- 2.8 Acceptance of our website policy. You acknowledge that your use of our website indicates your acceptance of our website security and privacy statements and as such determines the type and amount of personal information we collect about you.

3. **USING AND DISCLOSING YOUR PERSONAL INFORMATION.**

- 3.1 We respect your privacy.

Any personal information that we collect about you will be used by us to:

- (a) provide you with the products or services you have requested, or
- (b) assess an application by you for products or services we may provide and if that application is approved, to provide them to you.
- (c) comply with the law.

In addition, we may also use your personal information to:

- (a) Provide you with information about other products and services offered by us.
- (b) Provide you with information about other products and service offered by third party product and service providers such as insurers and financial planners with whom we have a relationship.

We do not use external identifiers to assist us in the management of personal information.

- 3.2 In order to assess your application for a product or service including a credit facility, or to provide it once approved, it may be necessary for us to disclose your personal information to other organisations with whom we conduct business.

- (a) Such organisations include, but are not limited to, related entities, solicitors and legal advisors, accountants and auditors, property valuers, printers and mailing services, insurers and mortgage insurers, financial planners, retirement products managers, credit card issuers, ATM/EFTPOS service providers, collection agencies, conveyancers, Creditlink and Government agencies which regulate our products and services.
- (b) Your personal information is only provided to those entities to the extent necessary to enable us to provide our products and services to you to the extent required by law.
- (c) We do not disclose (eg. rent, give away, sell or exchange) personal information or information generated by cookies or collected from your on-line enquiries.

- 3.3 We contract out some of our functions, as mentioned above, to external service providers. We may disclose your personal information to them so that they can provide the services we have contracted out to them. Where possible, all our service providers are subject to the NPPs or to contractual arrangements imposing substantially similar obligations.

4. SECURITY OF YOUR PERSONAL INFORMATION.

We store your personal information with a strong emphasis on its security and the protection of your privacy. In considering the security of your personal information, we have taken into account:

4.1 Physical security:

- (a) All files containing personal information are secured in locked cabinets and filing rooms after hours and when not in use. We require our staff to maintain a clean desk policy.
- (b) We may retain hard copies of identification items such as passports and drivers licences. These items are secured in the same manner as all personal information is maintained.
- (c) Unless required for future reference drafts, spare copies and extra materials generated in the handling of files containing personal materials are destroyed by means of a secure destruction service.
- (d) Personal information that is no longer required is permanently de-identified or destroyed by means of a secure destruction service.
- (e) Information about closed accounts is held for seven years at a secure off site facility and at the end of the seven year period the information is destroyed by means of a secure destruction service.

4.2 Computer and network security:

- (a) Access to the computer network is by user identification and password only. Passwords are changed regularly. The system administrator can identify all users by their user identification.
- (b) The system administrator regularly reviews computer logs for security breaches and reports any breaches to the relevant manager.
- (c) Computer files are regularly reviewed for continued relevance by a staff member with appropriate security clearance and where necessary deletion and purging of files no longer required is undertaken on a system wide basis.
- (d) Files are regularly backed up and saved at a separate and secure site.
- (e) Network security includes firewall and virus protection and network intrusion detection systems.

4.3 Website Security.

- (a) We take reasonable steps to preserve the security of cookie and personal information in accordance with this Privacy Policy. If your browser is suitably configured, it will advise you whether the information you are sending us will be secure (encrypted) or not secure (unencrypted). If secure transmission is indicated, we currently use 40 bit encryption.

- (b) A secure session can be identified by the graphic of a small padlock appearing on the bottom right hand frame of the browser window or by the first part of the URL (the Internet address) changing from “http://” to “https://”.
- (c) We regularly review developments in security and encryption technologies. Unfortunately, no data transmission over the Internet can be guaranteed as totally secure. Accordingly, although we strive to protect such information, we cannot ensure or warrant the security of any information that is transmitted between us and you do so at your own risk.
- (d) Once we receive your transmission, we take reasonable steps to preserve the security of the information in our own systems. Personal and financial information is stored on a separate secure server that is not directly connected to the Internet and communications between the web server and other internal services are secure.
- (e) Web servers are protected by best practice technologies including firewalls, intrusion detection software and virus detection software.
- (f) Entry to the secure banking section of the website is only possible by the entry of a valid and active user-id and access code.

4.4 Communications security:

- (a) No personal information is provided at branches, over the telephone or by facsimile until the identity of the applicant is verified.
- (b) Access to telephone banking is password protected.

4.5 Personnel security:

- (a) Hard file and computer copies of unsuccessful applications for employment are destroyed by means of a secure destruction service. Appropriate and lawful enquiries are made before an offer of employment is made to any person.
- (b) Access to your personal information is given to staff strictly on the basis of their need to have access to the material in order to fulfil their function within the credit union.

5. **ACCESS TO YOUR PERSONAL INFORMATION.**

- 5.1 From 21 December 2001, in most cases, you can gain access to personal information we hold about you. We will handle requests for access to your personal information in accordance with the NPPs. All requests for access to your personal information will be handled by our Privacy Compliance Officer, who can be contacted by telephone or in writing at the telephone number and postal and e-mail addresses set out in Section 6.
- 5.2 We will deal with all requests for access to personal information as quickly as possible. In any event, we will make an initial response to your request within 30 days. Requests for large amounts of information, or for information not currently in use, may require some time before a full response can be given.

- 5.3 In some circumstances under the NPPs we may refuse to give you access to personal information we hold about you. These are circumstances where giving you access would:
- (a) pose a serious and imminent threat to the life or health of any individual;
 - (b) have an unreasonable effect upon the privacy of other individuals;
 - (c) give you access to material which would not be accessible by the process of discovery in existing or anticipated legal proceedings between you and us;
 - (d) reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
 - (e) be unlawful;
 - (f) be likely to prejudice an investigation of possible unlawful activity, or
 - (g) be likely to prejudice:
 - the prevention, detection, investigation, prosecution or punishment of criminal offences, or certain other breaches of law;
 - the enforcement of laws relating to the confiscation of the proceeds of crime;
 - the protection of the public revenue;
 - the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct, or
 - the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders;by or on behalf of an enforcement body.
 - (h) We may also refuse access if:
 - we consider the request for access is frivolous or vexatious;
 - we are required or authorised by or under law to do so, or
 - an enforcement body performing a lawful security function asks us not to do so, on the basis that to do so would be likely to cause damage to the security of Australia.

If we refuse to give you access to the personal information you request, we will under the NPPs provide you with reasons for our refusal.

- 5.4 We wish to ensure that your personal information is accurate, complete and up to date. Generally, if you request us to do so, we will amend any personal information about you that is inaccurate, incomplete or out of date. If we disagree with you about any of these matters, and if you request us to do so, we will take reasonable steps to associate a statement to the effect that you claim the information to be inaccurate, incomplete or out of date with your personal information.

- 5.5 There will be no charge for lodging a request for access to personal information. However, we may charge you for providing access. Any charges will not be excessive and we will advise you of any such cost prior to us processing your request for information. A schedule of current charges is available upon request at all branches and is published on our website.

6. [CONTACTING US FOR FURTHER INFORMATION.](#)

You can get more information about the way we manage your personal information and the information we hold on file about you, by contacting us at the telephone number, postal or e-mail addresses set out below.

If you are concerned that we may have breached your privacy and wish to make a complaint, please contact us at the telephone number, postal or e-mail addresses set out below.

Contact details

- For access to your personal information or to request a change to personal information held
 - Telephone (02) 4941 3888
 - *Postal Address PO Box 851, Newcastle, 2300*
 - *E-mail privacyofficer@huecu.com.au*
- To receive further information about the way we manage personal information
 - Telephone (02) 4941 3888
 - *Postal Address PO Box 851, Newcastle, 2300*
 - *E-mail privacyofficer@huecu.com.au*
- To complain about a breach of privacy
 - Telephone (02) 4941 3888
 - *Postal Address PO Box 851, Newcastle, 2300*
 - *E-mail privacyofficer@huecu.com.au*

7. [CHANGES TO OUR PRIVACY POLICY.](#)

From time to time it may be necessary for us to review and revise our privacy policy. We reserve the right to change our privacy policy at any time. If we do change this privacy policy we will post amended versions in all our branches and post an updated version on our website, <http://www.hunterunited.com.au/>