

Karpaty Ukrainian Credit Union Limited **PRIVACY POLICY**

Protecting your privacy

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we do business.

As a financial services organisation, Karpaty Ukrainian Credit Union Limited (Karpaty), 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, use or disclose your personal information.

The *Karpaty Privacy 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 website via the Internet.

How we collect your personal information

We collect most personal information directly from you. For example, we may collect personal information when you open an account, fill in an application form,

deal with us over the telephone, send us a letter, visit our website or when you have contact with us in person.

The type of personal information we collect always includes your name and may include your mailing address, telephone number, e-mail address, tax file number, date of birth, annual income and other financial details, place of work, credit history and transaction history. In certain circumstances, we may also collect sensitive information such as health details.

There may be occasions when we need to source personal information about you from a third party. For example, we may collect personal information from a credit reporting agency or an insurer of your mortgage.

How we use your personal information

We collect your personal information to provide you with a particular product or service; for example, opening and operating an account.

We may use personal information for related purposes

We may also use or disclose your personal information for purposes related or ancillary to the main reason we collect it, such as:

Privacy Policy

- servicing our relationship with you;
- internal accounting and administration;
- regulatory reporting and compliance;
- protecting you and Karpaty from error and fraud; and
- helping us to identify and inform you about other products or services that may be of benefit to you.

We may contract out some of our functions and activities; for example, we may provide names and addresses to a mailing house to mail account statements to you. In these situations, we prohibit the third parties from using personal information about you except for the specific purpose for which we supply it.

Can we use your tax file number or other Commonwealth agency identifiers?

We do not use your tax file number (TFN), pension number, Medicare number or any other Commonwealth agency identifier as your account, policy or application number.

We only use and disclose these numbers for the purposes required by law, such as disclosing your TFN to the Australian Taxation Office. You may use your pension number or Medicare number to prove your identity when you deal with us.

Our duty of confidentiality

We have a duty to keep confidential all personal information we hold about you, including:

- your name, address, and financial data;
- the debit or credit balance in your account; and
- details of transactions on your account.

Our duty of confidentiality applies except where disclosure of your personal information is:

- **compelled by law**
For example, disclosure to various Government departments and agencies such as the Australian Taxation Office, and disclosure to courts under subpoena.
- **in the public interest**
For example, where a crime, fraud or misdeed is committed or is suspected, and disclosure against the customer's rights to confidentiality is justified.
- **in Karpaty's interest**
For example, disclosure to a court in the event of legal action to which Karpaty is a party; or necessary disclosures in connection with the sale of some Karpaty loans.
- **with your consent.**

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 of 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 Karpaty's service providers such as, disclosing your name and account number to a printer to personalise 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.

Disclosing to third parties

Except where it is required by law, we only disclose personal information to third parties with your express or implied consent.

For example, we may disclose personal information to: a credit reporting agency; an insurer of your mortgage; or, your guarantor in certain circumstances.

Karpaty does not disclose names and addresses to third parties for the purposes of allowing them to direct market their products and services.

Direct marketing and your privacy

From time to time we may use the personal information we have collected from you to identify products and services, which may be of interest to you. We may then contact you to let you know about these products or services.

If you do not wish to receive direct marketing information, you can tell us at any time. Please however note that your instructions may take a little time to flow through the system.

We keep your personal information up-to-date

If we have accurate personal information about you, it enables us to provide you with the best possible service.

We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date whenever we collect or use it.

We will correct personal information

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.

You can access your information

Karpaty shall, upon a written request, provide you with information about you which is

Privacy Policy

readily accessible and which may lawfully be provided. The information required to be provided is limited to Karpaty's record of your address, occupation, marital status, age, sex, accounts with Karpaty and balances and statements relating to those accounts.

Karpaty requires that you, as clearly as possible, identify the information requested and where it is located.

Karpaty may recover from you its reasonable cost of supplying you with this information.

Your request to provide information will be dealt with in a reasonable time.

We store your personal information securely

We protect any personal information that we hold from misuse and loss. We also protect it from unauthorised access, modification and disclosure.

Only authorised users can access your personal information, and access is only for approved purposes.

Your personal information may be stored in hardcopy documents, as electronic data, or in Karpaty's software or systems.

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.

Karpaty's Security Policy

We have comprehensive security policies and procedures documented in our internal security policy. Your personal information will be recorded, amended and deleted only by authorised means.

In addition, all employees sign confidentiality agreements as a condition of working for Karpaty.

Web site security and privacy

The Internet has rapidly changed the way we do business – it allows Karpaty to provide banking and financial services that you can access from the convenience of your own home or office.

We understand that you may be concerned about the confidentiality and security of the personal information we collect about you online. Accordingly, we have systems in place to ensure our online dealings with you as secure and confidential as yours dealings with us in person, or on the telephone.

The Credit Union can use its web site, which includes; Internet Banking, Telephone Banking and BPay to collect information about visitors to the site by the use of "cookies". Cookies are text files we place in your computer's browser to store your preferences. Cookies don't tell us your email address or other personally identifiable information. We only collect statistical

Privacy Policy

information regarding such occurrences as; the number of visitors over a period, the time spent online and documents downloaded, to name a few. The site is secure.

NetTeller, the Credit Unions Internet Banking System, uses a range of security techniques to help protect your personal information. This includes the latest and strongest 128-bit SSL data encryption technology to help provide the best protection currently available for your password and account details and any other information exchanged with NetTeller.

Resolving your concerns

We respond quickly to complaints

If you believe that the privacy of your personal information has been compromised, you are entitled to complain. We will respond to your complaint as soon as possible but within 2 working days, to let you know who is responsible for managing your complaint. We will try to resolve the complaint within 10 working days. When this is not possible, we will contact you within that time to let you know how long we estimate it will take to resolve the complaint.

We have also appointed a Customer Advocate who will objectively and impartially investigate your complaint if you are dissatisfied with our internal complaints process.

How to make a complaint

If you have a complaint, contact the person that you have been dealing with. We will take responsibility for your complaint at the point where the problem occurs. If your complaint is not resolved to your satisfaction, you can then contact our General Manager between 9am and 5.00pm Eastern Standard Time, to deal with your complaint.

Phone: (02) 9646 1377

Mail:

The General Manager
Karpaty Ukrainian Credit Union
Limited

27-29 Church Street
LIDCOMBE NSW 2141

Fax: (02) 9646 1311

Email: info@karpaty.com.au

If you are not happy with the way your complaint has been handled, you can ring the Credit Union Dispute Reference Centre (CUDRC). The CUDRC has been set up to help members resolve problems with their credit unions. It provides independent dispute resolution services, in accordance with the Credit Union Code of Practice.

Phone: 1800 624 241
or (02) 9267 1008

MAIL:

The Manager
Credit Union Dispute Reference
Centre Pty Ltd

Level 6, 50 Park Street,
Sydney NSW 2000

Fax: (02) 9267 3125

E-mail: [info@cudrc.com.au](mailto:info@ cudrc.com.au)

Website: www.cudrc.com.au

For more information regarding our complaints process, please refer to our brochure, *How can we help you with your concern? Problem with your Credit Union?*, which is available upon request at any branch on phone (02) 9646 1377 (Sydney) or (07) 3848 8100 (Brisbane).

Need more information?

If you have a query on how your personal information is collected or used, or any other query relating to Karpaty's Privacy Policy, call Karpaty on (02) 9646 1377 between 9.00am to 5.00pm EST, Monday to Friday.