

Privacy Policy

Important Note

About us

The financial services provided by Uniting Financial Services (UFS, we, us) are provided by The Uniting Church (NSW) Trust Association Limited ACN 000 022 480, ABN 89 725 654 978, AFSL 292186 and by the

Uniting Church in Australia Property Trust (NSW) ABN 77 005 284 605 (together, our related entities) pursuant to a s.911A Corporations Act 2001 (Cth.) authorisation and APRA Banking Exemption No.1 of 2017, for The Uniting Church in Australia, Synod of NSW and the ACT and ASIC Regulatory Guide 87 and ASIC Corporations (Charitable Investment Fundraising) Instrument 2016/813 exemptions.

Credit which is not regulated by the National Consumer Credit Protection Act 2009 (Cth.) (NCCP) or which has been exempted from the requirements of the NCCP is provided by The Uniting Church (NSW) Trust Association Limited. References in this policy to "consumer credit" refer to the provision of credit which is provided pursuant to an ASIC exemption from the requirements of the NCCP.

Uniting Financial Services® is a registered trademark of The Uniting Church (NSW) Trust Association Limited and is used with permission by The Uniting Church in Australia Property Trust (NSW).

Respecting your privacy and the law

The privacy of your personal information is important to us at Uniting Financial Services®.

We are committed to respecting your right to privacy and protecting your personal information. We are bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth.) (Act) as well as other applicable laws and codes affecting your personal

information, including the Privacy (Credit Reporting) Code 2014 (Privacy Law).

This document is our Privacy Policy and it tells you how we collect, use, hold and disclose your personal information (including finance information) and keep it safe. We are committed to respecting your rights to privacy under the Act and we comply with the Act's requirements in respect of the collection, management and disclosure of your personal information.

This document describes how we keep this commitment.

Our employees are trained to respect your privacy in accordance with our standards, policies and procedures.

If there is any inconsistency between this Privacy Policy and Privacy Law, the Privacy Law will prevail. Our Privacy Policy applies to all your dealings with us whether via phone, our websites or via any of our representatives. We encourage you to check our websites regularly for any update to it.

Privacy Policy

What is your personal information?

When used in this Privacy Policy, “personal information” includes any information or opinion, about an identified individual or an individual who can be easily identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have recorded it in material form or not. In general terms, it is any information that can be used to personally identify you. The information we seek to collect about you will depend on the products or services we provide. If you do not allow us to collect all the information we request, we may not be able to provide you with all of those products and services effectively.

What personal information do we collect and hold?

Depending on the nature of the product(s) or service(s) we provide you, the information we collect may include the following:

- Name;
- Street address and/or mailing address;
- Email address;
- Telephone number;
- Facsimile number;
- Age or birth date;
- Profession, occupation or job title;
- Your bank account details;
- Details related to the provision of credit by us or others;
- Your identification documents;
- Your Tax File Number or other government identifier;
- Details of the products and services you have obtained from us or which you have enquired about, together with any additional information necessary to deliver those products and services and respond to your enquiries;

- Any additional information relating to you and your products or services that you provide to us directly through our websites or indirectly through our websites and online presence, through our employees or otherwise; and
- Any information you provide to us by responding to our surveys or by any other means from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how our users use our website.

What personal information are we required to collect under the law?

We are required or authorized to collect personal information under the law, including as follows:

- Certain identification documentation about you by the Anti-Money Laundering and Counter-terrorism Financing Act 2006 (Cth.) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1);
- Your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1997 (Cth.); and
- If you have applied for credit or provide a guarantee, certain information about your financial position under the NCCP, and if you give us a mortgage security, certain identification information under property laws in some states and territories.

How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable for us to do so. The collection of most personal information will be made with your consent which will

usually be obtained at or around the time you take out a product from us. When collecting personal information from you, we may collect in ways including:

- Through your access and use of our website;
- During conversations between you and our representatives;
- When you apply for a role with us; or
- When you complete an application for one of our products or services or otherwise consent to the collection.

We may also collect personal information from third parties, including:

- From third party companies such as credit reporting agencies, law enforcement agencies and other government entities; and
- From your representative (such as a legal adviser), your employer or publicly available sources of information or any of the other organisations identified below under "Using and Disclosing Your Personal Information".

Collection of your personal information from credit reporting agencies

If you are applying for one of our lending products for commercial or personal purposes (for example, a Minister's Loan), as applicable, we obtain from and share your personal information with:

- Any business which provides information about the commercial credit worthiness of persons, your accountant or any other supplier of you. This is so we can obtain information about your commercial activities or commercial worthiness; and
- The credit reporting agencies, **Equifax** PO Box 964 North Sydney NSW 2059, Phone: 138 332, www.equifax.com.au, **Dun & Bradstreet** – PO Box 7083 Sydney NSW 2001, Phone: 13 23 33, www.dnb.com.au and Experian- Level 6, 549 St Kilda Road, Melbourne, VIC 300, www.experian.com.au

Visit their websites for more details about those organisations.

Information held on your credit reports will be credit information, personal information and public record information. Whether you've applied for credit for business or personal purposes, the type of credit information held on your credit file is similar and includes:

- Guarantor information
- Loan enquiries made in the past five years (by you or someone acting on your behalf); and
- Details of debts (including defaults and debts that are overdue by 60 days or more).

It also may include names of credit providers where you've applied for credit, whether you took the loan, were declined or chose not to proceed, whether you've got credit with a current provider or have repaid a loan within the last 5 years.

Personal information includes full name; date of birth; gender; address (current and last 2 known addresses); employer details; drivers licence number. Public record information about you from courts and government agencies includes any court judgments about any unpaid credit and bankruptcy details, or if you've offered or entered into a debt agreement.

Information on your credit report now also includes:

- Date loan contract opened;
- Current limit of loan contract;
- Type of credit contract;
- Date loan contract closed; and
- Loan payment history (for loans from licensed credit providers).

Internet privacy

Each time you visit one of our websites, we collect information from you electronically. This information may include:

- The date and time of visits;
- Which pages are viewed;
- How you navigate through the site and interact with the pages;
- Information about your location;
- Information about the device used to visit our website; and
- Your IP address

What personal information do we provide to credit reporting bodies?

We may provide personal information to credit reporting agencies like Veda Advantage, including how much you have borrowed and whether you fail to meet your loan repayment obligations.

You can also request a copy of the credit-related personal information we hold about you. You can ask us to correct any inaccurate information, or lodge a complaint with us relating to such information. You can also request a copy of your credit file from any credit reporting agency and ask them to correct any inaccurate information.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- We may not be able to provide the requested products or services to you, either to the same standard or at all;
- We may not be able to provide you with information about products and services that you may want; or
- We may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and provide the best possible quality of service for you. We collect, hold and disclose your personal information for the following purposes:

- To provide financial (including credit) products and services to you and to send communications requested by you or which we need to provide to you to satisfy our legal obligations;
- To answer enquiries and provide information about existing and new products and services;
- To provide you with access to protected areas of our website;
- To assess the performance of the website and improve its operation;
- To conduct business processing functions including to provide information to our related bodies corporate, contractors, service providers or other third parties;
- For the administrative, marketing (including direct marketing), planning, product or service; development, quality control and research purposes of Uniting Financial Services, The Uniting Church (NSW) Trust Association Limited and by the Uniting Church in Australia Property Trust (NSW), our and their contractors and service providers. These service providers may include mailing houses and mortgage originators;
- To update our records and to keep your personal information we hold up to date;
- To process and respond to any complaint made by you; and
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or cooperation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy policy.

Using unsolicited information and telling you we have it

Unsolicited information is information that is given to us that we haven't asked for from you or anyone else.

Sometimes we get this type of information and when we do, we'll check whether this information is reasonably necessary for what we do.

If it is, we'll handle this information in the same way we do all personal information under the Act. If we don't need it, we'll destroy or de-identify it unless it is unlawful or unreasonable for us to do so.

When we obtain personal information about you, we ensure that you have our contact details and that you are aware that we have collected it and if and what we will use it for.

We do not disclose your personal information to others including third parties except as set out in the next section.

We require these parties to conform to our procedures and the requirements of Privacy Law.

To whom may we disclose your information?

We may disclose your personal information to:

- Our employees, related entities, contractors or service providers for the purposes of the operation of our website or our business, fulfilling requests for products or services by you including, without limitation, web housing providers, IT systems administrators, posting services, payment processors, electronic network administrators, debt collectors, your and our professional advisors such as accountants, solicitors, business advisors and consultants;
- Third parties involved in the payments

system including financial institutions, merchants and payment organisations;

- Other organisations to which personal information is usually disclosed for the purposes of your financial or credit service provided by us. Depending on the service we provide, these organisations may include, card producers, card schemes, credit and fraud reporting agencies, debt collection agencies, mortgage insurance companies, your guarantors, organisations involved in valuing, surveying or registering a security property or which otherwise have an interest in such property, purchasers of debt portfolios, underwriters, re-insurers and other organisations involved in our normal business practices;
- Suppliers and other third parties with whom we have commercial relationships for business, marketing and related purposes (You may tell us not to send you marketing material); and
- Any organisation for any authorised purpose with your express consent.

We usually obtain your consent to our collection, use and disclosure of your personal information when you complete an application for a financial facility or credit service provided by us. In some cases, however, we may separately ask you to consent to our collection, use or disclosure of your personal information. In these cases, we usually require you to provide your consent in writing; some times we may accept your verbal consent.

We may disclose your personal information as required or authorised by law, for example, to government or regulatory bodies for purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.

We may combine or share any information that we collect from you with information

collected by any of our related entities (within Australia).

Direct marketing

We may use your personal information obtained for our provision of financial or credit services to you for the purpose of sending you direct marketing communications and information about our financial and credit services that we consider may be of interest to you. We will only use your personal information to do this where:

- We have collected your personal information from you;
- You would reasonably expect us to use or disclose your personal information for this purpose; and
- You have not requested us to cease providing you with this marketing.

These direct marketing communications may be sent in various forms, including email, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth.) If you indicate a preference for a method of communication, we will try to use that method whenever practicable to do so.

You may opt out of receiving marketing communications from us, or from The Uniting Church (NSW) Trust Association Limited and the Uniting Church in Australia Property Trust (NSW) by using the contact details provided in each direct marketing communication.

You may opt out of receiving marketing materials at any time and have your name removed from our marketing mailing lists at any time, by contacting us on 1300 133 673.

If you opt out of receiving marketing materials, you will continue to receive any communication about financial products or services you have with us where we are required by law to do this and/or the product or service terms and conditions requires us to send you these

communications, for example, to tell you about changes to the terms and conditions.

We do not provide your personal information to other organisations for the purposes of their direct marketing.

Cross-border disclosure of personal information, collection of sensitive information and government identifiers

In some cases, we may need to transfer your personal information outside Australia. Countries where our suppliers might hold personal information overseas currently include Singapore, the Philippines, the United States of America, Netherlands, Ireland and India.

We do not, without your consent, collect sensitive information about you, such as information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record. This is subject to some exceptions including where the collection is required by law or when the information is necessary for the establishment, exercise or defence of a legal claim.

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you inquire about our home loan interest rates you do not need to provide your personal details. You will not be able to obtain a financial product or service on an anonymous basis or by using a pseudonym.

Keeping your personal information up-to-date

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, up-to-date and complete. We verify information at the time we collect it, including in relation to any provision of a credit facility. To ensure accuracy of our records we also ask you to check your personal information in communications we send you, for example in statements relating to your financial service or credit facility, and to advise us if an update is needed.

If you believe your personal information is not accurate, complete or up to date, please contact us as soon as you can (see the **Contacting Us** section for more information).

How can you access and correct your personal information?

You can gain access to your personal information. This is subject to some exceptions allowed by law. Factors affecting your right to access include:

- Access would pose a serious threat to the life or health of any individual;
- Access would have an unreasonable impact on the privacy of others;
- A frivolous or vexatious request;
- The information relates to a commercially sensitive decision making process;
- Access would be unlawful;
- Access would prejudice enforcement activities relating to criminal activities and other breaches of law, public

revenue, a security function or negotiations with you;

- Legal dispute resolution proceedings; and
- Denying access is required or authorised by or under law.

We will give you written reasons if we deny you access.

We will not charge you for requesting access or for making any corrections to your personal information. We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you; if this applies, we will advise you of this at the time you make the request for access.

To request access, contact the Privacy Officer (see the Contacting us section for more information). In some cases we may be able to deal with your request over the telephone.

When you make a request for amendment of your personal information, we will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it. In this case we will write to you to advise you our reasons for not amending the information; we will also advise you of our complaints process if you wish to challenge our decision.

If you request amendment to your credit report held by a credit reporting agency, or to financial information we hold about you, we will adhere to the time frames and provisions relating to this set out in the Credit Reporting Code. See www.oaic.gov.au/privacy-law/privacy-registers/privacy-codes/ for more details about this.

At your request, where an amendment to your personal information is made, we will facilitate advising a relevant third party of the amendment.

Security of your personal information

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure. Some of the ways we do this are:

- Confidentiality requirements for our employees;
- Document storage security policies;
- Employees are bound by internal security policies and are required to keep information secure;
- All employees are required to complete training about information security;
- Security measures for systems access;
- Only allowing access to personal information where the individual seeking access has satisfied our identification requirements;
- Access control for our buildings;
- Security measures for our websites; and
- Requiring third parties, including external legal advisers, to comply with the Privacy Law.

Personal information is destroyed or de-identified when no longer needed.

As our websites are linked to the internet, and the internet is inherently insecure, unfortunately, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal or other information which you transmit to us online is transmitted at your own risk.

When you access our websites, you may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

Contacting us

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach by us of the Australian Privacy Principles, please contact our Privacy Officer using the details set out below.

We will acknowledge your complaint with 7 days after receipt of your complaint. We will let you know if we need any other information from you to resolve your complaint. We aim to resolve complaints as quickly as possible. We strive to resolve complaints within 5 business days but some complaints may take longer to resolve. If it is taking longer, we will let you know what is happening and advise a date by which we expect the complaint to be resolved.

We will treat your requests or complaints confidentially.

We will respond to any compliant in relation to our provision of credit to you as set out in the Credit Reporting Code, including in relation to the timeframes and process for response as set out in that code. See our website for more information on this.

Please contact our Privacy Officer at:

Privacy Officer

Uniting Financial Services

PO Box A2178 Sydney South NSW 1235
Level 9, 222 Pitt Street, Sydney NSW 2000
Phone: 1300 133 673

If you are not satisfied with the outcome of your complaint

If you are not satisfied with the outcome of your complaint, there are other bodies you can go to.

The Australian Financial Complaints Authority (AFCA) can consider most privacy complaints involving the providers of financial services. AFCA can be contacted at:

Australian Financial Complaints Authority (AFCA)

GPO Box 3, Melbourne VIC 3001

Phone: 1800 931 678

Email: info@afca.org.au

www.afca.org.au

Under the Act you have the right to lodge a complaint with the Office of the Australian Information Commissioner.

The Commissioner can be contacted at:

GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992

www.oaic.gov.au

Changes to our Privacy Policy

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website.

This Privacy Policy was last updated in 1 November 2018.

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Call 1300 133 673 or visit
unitingfinancial.com.au

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