

PRIVACY POLICY

28 JULY 2016

QBANK 

Schedule of Review

Date	Action	Approved By
December 2001	New policy	Board
13 June 2002	Annual review	Board
3 November 2003	Annual review	Board
27 May 2004	Annual review	Board
9 June 2005	Annual review	Board
27 July 2006	Annual review	Board
15 May 2008	Annual review	Board
18 December 2008	Annual review	Board
17 December 2009	Annual review	Board
22 December 2010	Annual review	Board
23 December 2011	Annual review	Board
20 December 2012	Annual review	Board
21 February 2014	New Policy	Board
19 June 2015	Annual review	Board
28 July 2016	Annual review	Board

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1. General

QPCU Limited (**QBANK**) is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (Privacy Act). We are also bound by Division 3 of Part IIIA of the Privacy Act, which regulates the handling of credit information, credit eligibility information and related information by credit providers.

This Privacy Policy outlines how we deal with your personal information (which may include credit-related information), as well as our legal obligations and rights as to that information. If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

2. Key types of information

Certain words have special meanings when used in this Privacy Policy. These are shown below.

"Personal information" means information or an opinion about an individual who is identified, or who can reasonably be identified, from the information. Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about the individual.

"Credit eligibility information" means information that has been obtained from a credit reporting body, or that has been derived from that information, that is about an individual's credit worthiness.

"Credit information" means personal information that includes the following:

- information about an individual, like their name and address, that we may use to identify that individual
- information about an individual's current or terminated consumer credit accounts and an individual's repayment history
- the type and amount of credit applied for in any previous consumer or commercial credit applications to any credit provider, where that credit provider has requested information
- information about an individual from a credit reporting body
- information about consumer credit payments overdue for at least 60 days and for which collection action has started
- advice that payments that were previously notified to a credit reporting body as overdue are no longer overdue
- information about new credit arrangements an individual may have made with a credit provider, in relation to consumer credit currently or previously

held, to deal with any defaults or serious credit infringements by that individual

- information about court judgments which relate to credit that an individual has obtained or applied for
- information about an individual on the National Personal Insolvency Index
- publicly available information about an individual's credit worthiness, and
- an opinion of a credit provider that an individual has committed a serious credit infringement of credit provided by that credit provider.

We may not hold all of these kinds of information about a particular individual. However, if we hold any of these kinds of information, it is protected as "credit information" under this Privacy Policy.

"Credit-related information" means credit information, credit eligibility information and related information.

3. Collection

Wherever possible, we will collect personal information directly from you. If you apply for one of our credit products, we may also collect credit-related information about you.

We only ask for personal information relevant to operating our business. We may request:

- identifying information, like your name, address and other contact details and your date of birth
- your financial information
- your employment details or work history
- your tax details (e.g., TFN, ABN).

Depending on our relationship with you, we may also collect personal 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 to manage credit risk, collecting debts and other activities. If this applies to you, then 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 personal information is created through our internal processes, like credit eligibility scoring information.

4. Use

We may use your personal 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
- assessing and processing your mortgage broker or aggregator application to distribute our products and services
- establishing and providing our systems and processes to provide our products and services to you
- executing your instructions
- charging and billing
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- research and development
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems, or
- direct marketing.

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

- a purpose set out in this Privacy 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.

5. Disclosure

We may disclose your personal 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 business activities
- superannuation funds, where superannuation services are provided to you
- other financial institutions, for example, when you apply for a loan from another credit provider and you agree to us providing information to the other credit provider
- 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 advisors, such as accountants, lawyers and auditors
- state or territory authorities that give assistance to facilitate the provision of home loans to individuals
- certain entities that have bought or otherwise obtained an interest in your credit product, or that are considering doing so, and their professional advisors
- your representative, for example, lawyer, mortgage broker, financial advisor 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.

We have taken measures to prevent the disclosure of your personal information overseas, including your credit information and credit eligibility information. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in this Privacy Policy.

6. Sensitive information

Where it is necessary to do so, we may collect personal information about you that is "sensitive". Sensitive information includes information about an individual's 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.

7. Security

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

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

If you are a QBANK member, we ask you to keep your passwords and personal identification numbers safe.

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.

8. Website

This section explains how we handle personal information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact our Privacy Officer, whose details are in paragraph 14 of this Privacy Policy, as there are other ways for you to provide us with your personal information.

Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

- the time and date of the visit
- any information or documentation that you download
- your browser type, and
- internet protocol details of the device used to access the site.

Our website also includes a number of calculators, which may require you to enter your personal details. If you save the data you enter on the calculator, this information will be stored.

Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured

pages of our website (i.e., pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (i.e., public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so might prevent you from accessing the secured pages of 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 information. Any data containing personal 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 Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

9. Access

You may request access to the personal information that we hold about you at any time from our Privacy Officer whose details are in paragraph 14 of this Privacy 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.

10. Accuracy

We take reasonable steps to make sure that the personal 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 Privacy Officer whose details are in paragraph 14 of this Privacy Policy.

11. Marketing

This section primarily applies to QBANK members only.

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 are permitted to do this even if you are on the Do Not Call Register (provided you have provided us with your consent).

We may also provide your details to other organisations we have arrangements with for the purpose of promoting their products and services, and to mailing houses and agents used in administering direct marketing.

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 or disclose your information to other organisations for marketing purposes. You can make this request by contacting our Privacy Officer whose details are in paragraph 14 of this Privacy Policy, or by unsubscribing from our email marketing messages, which always include an 'unsubscribe' option.

To help us reach the right people with our direct marketing, we may ask a credit reporting body to "pre-screen" a list of potential recipients of our direct marketing against our eligibility criteria to remove recipients that do not meet those criteria. The credit reporting body cannot use information about your existing loans or repayment history in carrying out its pre-screening and it must destroy its pre-screening assessment once it has given us, or a contractor acting on our behalf, the list of eligible recipients. If you do not want your credit information used for pre-screening by a credit reporting body that holds credit information about you, you can opt-out by informing that credit reporting body, through contact details on their website.

12. Changes to the Privacy Policy

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

13. Questions and complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information, please contact our Privacy Officer whose details are in paragraph 14 of this Privacy Policy. 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 aim to deal with your complaint at the source of your complaint. If you are not satisfied with the response you receive you can contact external bodies that deal with privacy complaints. These are Credit and Investments Ombudsman (our external dispute resolution scheme), the Federal Privacy Commissioner or, in the case of insurance-related privacy complaints, the Australian Prudential Regulation Authority. Any 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 and Investments Ombudsman
Post: PO Box A252, South Sydney NSW 1235
Telephone: 1800 138 422
Website: www.cio.org.au

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

Australian Prudential Regulation Authority
Post: GPO Box 9836, Sydney NSW 2001
Telephone: 1300 55 88 49
Website: www.apra.gov.au

14. Privacy Officer

Our Privacy Officer's contact details are:

Address: PO Box 13003, George Street, Queensland 4003

Telephone: 13 7728

Email: privacy@QBANK.com.au

15. Disclaimer

This Privacy 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 Privacy Policy.