

CIRCLE Privacy Policy

CIRCLE Mutual Limited (Circle) is a party to a strategic alliance with Bendigo and Adelaide Bank Limited (Bendigo) ACN 068 049 178 AFSL/Australian Credit Licence 237879, under which Circle acts as an agent of Bendigo Bank. As a result, personal information held by CIRCLE Alliance Bank may be shared with Bendigo Bank, and other third party providers, where you obtain a financial product or credit facility through CIRCLE Alliance Bank.

This Privacy Policy contains important information about your personal information.

About this policy

This document sets out how CIRCLE Mutual Limited ACN 087 650 968 / ABN 46 087 650 968 trading as CIRCLE Alliance Bank (“we” or “us”) safeguards your privacy.

This document has been developed to follow a ‘layered’ format which means that it offers layers of detail. You can therefore read as much or as little as you like and can find what you need quicker.

Information about how we handle your credit related information is contained in our Credit Reporting policy which is available on our website.

Privacy Policy

We recognise the importance of protecting your privacy. We are committed to ensuring the continued integrity and security of the personal information you entrust to us.

We appreciate that the success of our business is largely dependent upon a relationship of trust being established and maintained with past, current and prospective members, shareholders and other individuals with whom we conduct business. We will therefore continue to collect and manage your personal information with a high degree of diligence and care.

Our aim is to comply at all times with the privacy laws (incorporating the Australian Privacy Principles) that apply to us. If you have a comment, query or complaint regarding a privacy matter, we encourage you to discuss it with us.

Collection

We usually collect personal information directly from you. Sometimes we collect or confirm this information from a third party such as a credit reporting body. We will use reasonable efforts to obtain your consent prior to contacting a third party for this purpose.

We collect personal information that includes details such as your:

-) Name
-) Address
-) Date of birth
-) Contact details (such as phone and fax numbers, e-mail addresses)
-) Financial information such as information about your use of financial products and services which you acquire from or through us.

In some cases, we may need to collect sensitive information about you (such as health related information). We will first seek your consent to collect such information where we are required to do so.

As part of our business operations we also collect personal information from other individuals such as shareholders and non-corporate suppliers. Where you are not a member of ours you may still seek confirmation as to whether we hold information in relation to you.

We may collect information from you because we are required or authorised by an Australian law or court/tribunal order to collect that information. We will tell you if collection is required or authorised by law and provide you with details of the law, court or tribunal order. Examples of which include:

-) Anti-Money Laundering and Counter-Terrorism Financing laws;
-) The National Consumer Credit Protection Act 2009 (Cth); and
-) The Income Tax Assessment Act 1936 (Cth).

We may collect personal information about you from commercially available third party databases.

When you visit our website, apps or other web-based content and services ("Websites"), either we or our service provider will record information (such as your computer's IP address and top level domain name, the type of browser you are using, the date, time and pages accessed) in relation to your visit

Use and disclosure

We use your personal information in order to:

-) Provide you with financial products and services (including situations where we are an agent for another product issuer)
-) Assist you with your queries or concerns
-) Comply with any legal or regulatory obligations imposed on us
-) Perform our necessary business functions (such as internal audit investigations, performance reporting, research, product development and planning, assessing credit applications for new or existing loans and managing your credit accounts).

To do this, we may disclose your personal information to organisations that carry out functions on our behalf. This may include for example, mailing and printing houses, cheque and electronic transaction processors, information technology service providers, professional advisers, account holders and operators, valuers, introducers, guarantors, debt collection agencies, regulators and government authorities. Our agreements with these entities ensure this information is only used to carry out functions on our behalf.

Depending upon the type of product you have requested, we may also disclose your personal information to credit reporting bodies, the trustee or manager of a superannuation fund and insurance companies.

In the case of shareholders, personal information is disclosed to our share registry service provider.

We may also disclose your personal information to an individual or an organisation (a 'third party') if:

-) You direct us to do so;
-) You consent to the third party obtaining the information from us; or
-) You consent to the third party accessing the information on our systems, and/or do anything which enables the third party to obtain access.

Your consent to a third party obtaining or accessing information may be implied from:

- J Your use of any service or application which a third party provides to you, or makes available to you, which involves the third party obtaining or accessing personal information held by us or organisations like us; or
- J You doing anything else which enables the third party to obtain access to the information.

You should never provide or disclose any of your pass codes to any third party to enable the third party to obtain or access your personal information. If you do, you may breach the ePayments Code and the terms and conditions applying to the products and services we provide to you, and you may be liable for any unauthorised transactions that subsequently occur. Pass codes include PINs, internet and telephone banking passwords, and codes generated by security tokens.

We may also use your personal information to tell you about other financial products and services we think you may be interested in. This may include products and services offered or distributed by us or the companies with which we are associated. You can opt out of receiving this information (see 'Opting out of product promotions' below). We do not sell your personal information to third parties.

We provide services to a number of business partners and their members. In order to provide these services, personal information may be used and exchanged. The information of these members is given the same level of protection and treated in the same way as for members of CIRCLE.

Where we have collected your personal information on behalf of another party (for example, where we are an agent for another product issuer) or we have disclosed your information to a third party at the request of a service provider nominated by you, the use of your personal information by that party is governed by their privacy policy. You should contact them to understand how they might use your personal information.

Disclosure to overseas recipients

In some cases, we may need to share some of your information with organisations outside Australia. For example, when you instruct us to carry out a transaction such as a telegraphic transfer to or from an overseas country, or when we use service providers located overseas to perform a function on our behalf.

Circle may share your information with overseas organisations that are located in the following countries:

- J Canada
- J India
- J Nauru
- J Philippines
- J Singapore
- J Spain
- J UK
- J US

You may also refer to the Privacy statement provided to you for specific information about overseas disclosure.

When we share your information with organisations overseas, we ensure appropriate data handling and security measures are in place.

Access and correction

In most cases you can access your personal information held by us. If you believe that personal information we hold about you is inaccurate, out of date or incomplete, you should contact us (see 'Contacting us' below).

We will promptly update your personal information that is inaccurate, out of date or incomplete. In some cases, we may request you to provide us with supporting documentation to amend the personal information we hold about you.

If we do not agree that your information is inaccurate, out of date or incomplete, we will give you a written notice including the reasons why we do not agree with you and how you can make a complaint.

Opting out of product promotions

You can opt out of receiving direct marketing material at any time by contacting us (see 'Contacting us' below).

If you do opt out, we will continue to provide information in relation to your existing accounts or facilities only (including new features or products related to these accounts/facilities).

Storage and security of your personal information

We will take reasonable steps to keep the personal information that we hold about you secure to ensure that it is protected from loss, unauthorised access, use, modification or disclosure.

Your personal information is stored within secure systems that are protected in controlled facilities. Our employees and authorised agents are obliged to respect the confidentiality of any personal information held by us.

You can also help to keep the personal information that we hold about you secure by taking care before you authorise or otherwise assist any third party to obtain or gain access to that information (see 'Use and disclosure' above).

Our Websites and the use of cookies

We use our best efforts to ensure that information received via our Websites remains secured within our systems. We are regularly reviewing developments in online security; however users should be aware that there are inherent risks in transmitting information across the internet.

We use cookies on our Websites. Cookies can make using our Websites easier by storing information about your preferences and enabling you to take full advantage of our services. Cookies are very small text files that a website can transfer to your computer's hard drive or portable electronic device's memory for record keeping.

We may also use cookies so that we can determine which parts of our Websites are visited most often, or whether you visited our site from a banner advertisement for one of our products and services on another party's website, and other sites you may visit from our Websites.

Sometimes cookies are used by a third party service provider with whom we have an agreement to monitor the success of our marketing campaigns. The third party service provider uses the cookies to collect information such as when you visited our site, your browser type and the server that you log in to on your computer.

The information is used in an aggregate form and generally no personal information is collected by the third party service provider. Our agreements with these third parties ensure this information is only used to carry out functions on our behalf, and if any personal information is collected the confidentiality of that information is maintained.

We may also use cookies so that we can see which parts of our Websites you visit when you access those Websites. We may use this information for marketing products and services to you. We keep this information confidential and we do not disclose it to third parties.

Most internet web browsers are pre-set to accept cookies to enable full use of websites that employ them. However, if you do not wish to receive any cookies on an internet web browser, you may configure your browser to reject them or receive a warning when cookies are being used. In some instances, this may mean that you will not be able to use some or all of the services provided on our Websites. However, you may still be able to access information-only pages.

Changes to this policy

From time to time, it may be necessary for us to review our Privacy Policy and the information contained in this document. We will notify you of any changes by posting an updated version on our Websites.

Resolving complaints

If you have concerns or wish to make a complaint regarding the handling of your personal information by us, please contact our team on 1300 553 582 or at info@circle.com.au. We will promptly investigate your complaint and notify you of the outcome.

We consider Internal Dispute Resolution (IDR) to be an important and necessary first step in the complaint handling process as it gives us an opportunity to hear when we do not meet our customer's expectations and address them genuinely, efficiently and effectively.

You can raise your complaint with us by:

- (a) speaking to a member of our staff directly
- (b) telephoning 1300 553 582
- (c) www.circle.com.au/your-circle/contact
- (d) emailing us at info@circle.com.au
- (e) writing to us at:
CIRCLE Alliance Bank
Complaints Officer
PO Box 135
Deer Park VIC 3023

Where we have issued the financial product or service in question as an authorised representative of Bendigo Bank, or our other third party licensees, they also have a legal responsibility for having an IDR system in place and may become involved in the dispute.

If you want to raise a complaint directly with Bendigo Bank, you can contact the Customer Feedback Team at:

Reply Paid PO Box 480
Bendigo VIC 3552
Telephone: 1300 361 911
8.30am – 5.00pm (AEST/ADST) Monday to Friday
Email: feedback@bendigoadelaide.com.au

If you are not satisfied with the response provided you can refer your complaint directly to the appropriate External Dispute Resolution scheme.

We are a member of the Australian Financial Complaints Authority (AFCA). You can contact AFCA at:

GPO Box 3
Melbourne Vic 3001
Telephone: 1800 931 678
Email: info@afca.org.au
Web: www.afca.org.au

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if, or when the time limit relevant to your circumstances expire.

If your complaint relates to how we handle your personal information you can also contact the Office of the Australian Information Commissioner (OAIC):

GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au
Web: www.oaic.gov.au
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