



BANK OF SYDNEY LTD PRIVACY POLICY

Who are we?

'We', 'us' and 'our' refer to Bank of Sydney Ltd, ACN 093 488 629, AFSL and Australian Credit Licence 243 444 and our related businesses (**BOS**).

Our commitment to protect your privacy

We are committed to protecting the privacy and security of the personal information that you entrust to us. Maintaining your trust and confidence is of the utmost importance in our banking relationship. This policy applies both to current clients of BOS and to applicants for any service, irrespective of whether their application may be accepted or rejected.

This policy sets out our privacy policy commitment in respect of the personal information we hold about you and what we do with that information.

Our commitment in respect of the personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law.

The purpose of this Privacy Policy is to inform you as to:

- The personal information that is collected from you.
- The purpose for which the personal information is held.
- Whether the personal information may be shared or used by others in the course of our banking operations.
- The manner by which you can inform us of your complaint should you feel there has been a breach of the privacy and security of any of personal information that you have given us.

We refer to "**personal information**" within the text of our policy to mean information or an opinion about an identifiable individual, or an individual that is reasonably identifiable:

- whether the information is true or not; and/or
- whether the information is recorded in a material form or not.

When we refer to '**credit information**' we mean information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

Credit information

We may collect the following kinds of credit information and exchange this information with credit reporting bodies and other entities:



- credit liability information being information about your existing finance which includes the name of the credit provider, whether the credit provider holds an Australian Credit Licence, the type of finance, the day the finance is entered into, the terms and conditions of the finance, the maximum amount of finance available, and the day on which the finance was terminated;
- repayment history information which is information about whether you meet your repayments on time;
- information about the type of finance that you are applying for;
- default and payment information; and
- court proceedings information.

We exchange this credit information for the purposes of assessing your application for finance and managing that finance.

This credit information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store the credit information we hold about you.

How your personal information (or data) is collected by BOS

We collect your personal information from you in a number of ways which include:

- when you complete an application for a banking product, service or credit facility;
- when you participate in a BOS competition or promotion;
- during business and social functions where contact details are exchanged; or
- through your use of electronic devices when visiting our website or BOS social media sites.

We may also collect your personal information from credit reporting bodies and from brokers and other people such as Accountants and Lawyers.

The types of personal information that we may collect from you

Personal information collected includes name, gender, address, date of birth, phone and fax numbers, employment details, TFN's, email, citizenship and residency details, marital status, means of personal identification (i.e. passport, driver's license numbers) the purpose of any credit product that you may apply for, number and ages of dependants, cohabitants, length of time at current address, assets, liabilities, income and other financial commitments, the fact you have applied for banking products and services including credit and the amount of credit.

Once you have opened an account with us, to effectively administer your account and better serve you, we also collect, maintain and monitor details of your transactions and balances of your accounts.

Sensitive information

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion,



memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

What is the purpose of collection?

BOS collects your information for the following purposes:

- arranging, assessing, providing, managing and administering your banking relationships and credit facilities;
- to comply with any law in force from time to time;
- to meet local and international reporting protocols (directly or indirectly); and
- for direct marketing of BOS products and services or products and services of any organisation affiliated or represented.

Note: You have the right to request not to receive direct marketing material.

Opting out of receiving direct marketing material and product promotions

You can contact BOS and opt at any time not to receive any marketing from us about new products, services or promotions. If you do decide to opt out, we will continue to provide information in relation to your specific existing accounts only, including new features or products related to these specific accounts.

What happens if you do not provide your information?

The information collected by BOS is required to comply with legislative and regulatory requirements and is necessary to undertake our business as a Bank. If you do not provide any of the information requested of you then BOS will not be in a position to assist you with our banking services and may not be able to consider or approve any application. BOS also reserves the right to refuse to provide you with banking services if you have not provided the required information.

How BOS uses your personal information:

BOS uses the personal information collected about you for a variety of purposes related to the financial products, credit products, or services we provide you.

BOS uses your information to:

- to conduct the bank's regular and necessary business functions such as internal audit, performance reporting, research, product development and planning.
- to support, promote and process our transaction relations (through this we may offer you other products and services that will enhance our relationship with you).
- assess an application for a banking product or service including an application for consumer or commercial credit;
- to comply with legislative and regulatory requirements including the Privacy Act 1988 and the Anti-Money Laundering and Counter-terrorism Financing Act 2006;



- to verify your information;
- conduct risk assessment and management involving securitisation, credit scoring, portfolio analysis, reporting, fraud prevention and to collect overdue payments from you;
- administer any facility held;
- to provide to authorised third parties where applicable (such as insurers);
- and for any purpose authorised by law;
- assess the risk of:
 - you defaulting on your obligations to BOS;
 - you being unable to meet a liability that might arise under a guarantee, in respect of mortgage finance given (or to be given) by BOS to another person.

Cookies

When you visit our website (and BOS social media sites) we may use cookies and similar technologies, including mobile device identifiers, to help us recognise you, improve your BOS banking experience, increase security, measure use of our services and to deliver related advertising and promotions.

By visiting the BOS website (and BOS social media sites), you consent to the collection of your personal information via cookies in accordance with this Privacy Policy.

You can control cookies through your browser settings and other tools; however some cookies are necessary in order for the website to work as intended.

Who BOS discloses your personal information to:

BOS may engage outside individuals or organisations to provide support services for the Bank. In the course of providing the support service they may have access to your personal information. That access is strictly limited to the performance of the support service that we have requested or contracted to be provided. They are not allowed to use your personal information for their own personal or business related purposes.

To enable us to maintain a successful business relationship we may disclose personal information as permitted by law, which may include the following entities:

- BOS service providers (including marketing companies, data consultants and IT contractors, stationary printing houses and mail houses);
- people considering acquiring or taking an interest in BOS business or assets;
- to parties for the purposes of fraud prevention;
- their agents, contractors, and external advisers;
- identity verification services;



- your referees, including your employer;
- your legal and financial advisers;
- government and other regulatory bodies (e.g. APRA, ASIC, AUSTRAC, ATO);
- mercantile agents if you default on your obligations to BOS;
- payment system operators;
- other financial institutions and credit providers;
- related companies, whether in Australia or overseas and specifically countries such as Lebanon to the parent company;
- mortgage insurers and reinsurers;
- parties for the purpose of securitisation arrangements (e.g. purchasing, funding, managing and processing credit and/or insurance);
- a guarantor or potential guarantor;
- credit ratings agencies; and
- credit reporting bodies (see 'Notifiable matters' below).

Notifiable matters

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information. You may request to have these notifiable matters (and this privacy policy) provided to you in an alternative form.

We exchange your credit information with credit reporting bodies. The credit reporting body may then include your information in reports that the credit reporting body gives other organisations (such as other lenders and insurance companies) to help them assess your credit worthiness.

We use the credit information that we exchange with the credit reporting body to assess your application for finance and managing your finance.

If you fail to meet your payment obligations in relation to any finance that we have provided or arranged or you have committed a serious credit infringement then we may disclose this information to a credit reporting body and accordingly this may affect your ability to obtain credit from other lenders.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. *Please see the heading: 'Access and correction to your personal information (including credit information)' below.*

Sometimes your credit information will be used by credit reporting bodies for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your credit information is not used in this way.



You may contact the credit reporting body to advise them that you believe that you may have been a victim of fraud. For a period of 21 days after the credit reporting body receives your notification the credit reporting body must not use or disclose that credit information. You can contact the following credit reporting body for more information:

- www.veda.com.au

You can also contact the credit reporting body to limit the use of your personal information for their marketing purposes.

Prior to disclosing any of your personal information

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment; or
- b) you have consented to us making the disclosure.

Note: BOS may release your personal information where there is a duty to do so by law, without obtaining your prior consent to disclose that information. We will not sell or disclose your information to any individual or organisation for unrelated marketing purposes.

When BOS may exchange your information

BOS may also need to exchange information between credit providers (e.g. originators, mortgage broker, mortgage originator, mortgage manager) and advisors (e.g. accountant, lawyer, financial consultant) named in this application and others named in any credit report during the course of providing the credit facility, mortgage or insurance policy to you or proposed to be provided to you.

Information exchanged may include any information about you including information about your credit standing, credit history or credit capacity that credit providers or insurers are allowed to exchange under the Privacy Act 1988.

In addition and where permitted by the Privacy Act 1988, BOS may share your information with a credit reporting body or other parties for the purposes of fraud prevention.

Security and Storage of your Personal Information

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located in or outside Australia.

We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

We make every effort to maintain administrative, electronic, physical, and procedural safeguards to store and protect the confidentiality of your personal information and to ensure it is accurate, current and confidential.



Our employees are trained and both our employees and agents are required to safeguard your personal information and can only access your personal information for purposes related to your business with the Bank.

Access and correction to your personal information (including credit information)

You may access and (where required) correct your personal information held by BOS

Subject to the provisions of the Privacy Act, you may access your personal information, including the credit-related information we hold about you, at any time, or if you identify any inaccuracy or need to update details of your personal information, you may ask to do so at any BOS branch. BOS may charge you a reasonable fee for access.

You may have access to the extent that the bank is required or is authorised. BOS may refuse access to a record under the applicable provisions of any law of the Commonwealth.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within a reasonable time of receiving your request. We may need to contact other entities to properly investigate your request and/or to retrieve information from other locations.

There may be situations where we are not required to provide you with access to your personal or credit information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you, if we deny you access to the personal or credit information we hold about you.

If we refuse to correct personal or credit information we will provide you with our reasons for not correcting the information.

You may also ask for a copy of your credit file from the credit reporting body BOS uses:

Veda – www.Veda.com.au

Note: Each credit reporting body has a policy about how it deals with your information and you can ask for a copy by contacting them directly using the contact details provided above.

Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

Making a Complaint regarding your Privacy

If at any time you believe we have acted in a way that is inconsistent with this policy in the manner by which we dealt with your personal information or you have a complaint about our adherence with the Privacy Act, please visit your nearest branch to discuss the matter. You may also contact the BOS Compliance - Privacy Officer by telephone or even address your privacy complaint in writing.



Our contact details are listed below:

Attention: Compliance - Privacy Officer

Bank of Sydney Ltd

PO BOX 4288

SYDNEY NSW 2001

Telephone: 1300 888 700

If you are dissatisfied with our response you may make a complaint to our External Dispute Resolution Scheme, Financial Ombudsman Service (FOS) which can be contacted on either www.fos.org.au or 1300 780 808 or the Privacy Commissioner which can be contacted on either www.oaic.gov.au or 1300 363 992.

Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy policy from time to time or as the need arises.

You may request this privacy policy in an alternative form.