

# Privacy at Killarney Co-operative Limited – Our Privacy Policy

Ensuring that we manage your personal information securely and consistently with the Privacy Act is a top priority for all of us at Killarney Co-operative Limited. This policy is intended to help you understand how we manage the personal information that we collect about you, how you can seek access to and correction of that information and, if necessary, how you can make a complaint relating to our handling of that information. Unless stated otherwise, this policy is relevant to the personal information of both our current and former customers, as well as other individuals we may deal with (for example, guarantors, directors and shareholders relating to our customers or individuals we deal with in other capacities as part of our business).

For information about our management of your credit-related information, please see our **Credit Reporting Policy** (available by visiting [www.killarneycoop.com](http://www.killarneycoop.com) and selecting 'Privacy') which contains information about credit reporting, including the credit reporting bodies with which we may share your credit information.

## Personal information we may collect and how we usually collect it:

The nature of the personal information we collect and hold, and where it comes from, will vary according to the circumstances in which we are dealing with you (for example, if you are a customer, according to the specific product or service we are providing). This information may include:

- information we collect from you, or persons acting on your behalf, on applications or other documentation or communications, such as your name, residential and business addresses, telephone numbers, email and other electronic addresses, occupation, assets, expenses, income, dependents and details about your business dealings and other events in your life;
- information about your transactions and products with us, our affiliates, or third parties, such as account balances, payment history and details about account activity and product use;
- government identifiers such as your tax file number or ABN (for example, to verify your identity at the time you request a product or service);
- other details relating to your relationship with us, including if we deal with you in a capacity other than a customer (for example, information about agreements or other arrangements or transactions you may have with us).

We usually collect your personal information directly from you. However, sometimes we may need to collect personal information about you from third parties for the purposes described below. The circumstances in which we may need to do this include, for example, where we need information from a third party to assist us to process an application (such as to verify information you have provided or to assess your circumstances) or to assist us to locate or communicate with you.

## How we hold and protect your personal information:

We may hold your personal information in physical form or in electronic form on our systems or the systems of our service providers.

The personal information we hold about you is protected by physical, electronic, and procedural safeguards and we also require our service providers that hold and process such information on our behalf to follow appropriate standards of security and confidentiality.

We train people who work for us on how to handle personal information appropriately and we restrict access to what is necessary for specific job functions.

## Purposes for which we may collect, use and disclose your personal information:

We will only collect, use and disclose your personal information as reasonably necessary for our business purposes and as permitted by law. These purposes may include:

- processing a product application or service request (including verifying a person's identity for these purposes);
- managing our products and services or other relationships and arrangements, including processing receipts, payments and invoices;
- evaluating and monitoring credit worthiness;

- detecting and preventing fraud and other risks to us and our customers;
- responding to inquiries about applications, accounts or other products, services or arrangements;
- understanding our customers' needs and offering products and services to meet those needs;
- researching and developing our products and services and maintaining and developing our systems and infrastructure (including undertaking testing);
- dealing with complaints;
- meeting legal and regulatory requirements. Various Australian and international laws may expressly require us to collect/and or disclose your personal information, or we may need to do so in order to be able to comply with other obligations under those laws. Such laws include the National Consumer Credit Protection Act (for example, to comply with responsible lending requirements), the Anti-Money Laundering and Counter-Terrorism Financing Act (for example, to comply with identity verification requirements), the Personal Property Securities Act and State and Territory real property and security interests laws (for example, to register and search for security interests), the Banking Act, the Financial Sector (Collection of Data) Act, the Corporations Act and other regulatory legislation (for example, requiring us to maintain client and transaction records, to provide information relating to your deposits and loans to APRA for prudential and monitoring purposes and to make reports and provide other information to regulators such as ASIC) and the Taxation Administration Act, the Income Tax Assessment Act and other taxation laws (for example, to comply with information requests issued by the Commissioner of Taxation);
- enforcing our rights, including undertaking debt collection activities and legal proceedings.

### **Disclosures of personal information to third parties:**

In common with many organisations, we obtain services from external service providers, some of which may be located outside Australia, and your information may be provided to them for this purpose. We may also need to disclose your personal information to third parties for the purposes listed above.

Third parties to whom we disclose your personal information may include:

- administrative services providers, such as mailing houses and printers;
- legal, settlement and valuation service providers;
- data processing providers;
- regulatory bodies in Australia and overseas;
- financial and other advisors;
- your guarantors, referees and security providers;
- debt collectors;
- organisations wishing to acquire an interest in any part of our business from time to time; and
- credit reporting bodies and other information providers.

### **Gaining access to your personal information:**

You are entitled under the Privacy Act to access personal information we hold about you by contacting our Privacy Officer. To contact the Killarney Co-operative Limited Privacy Officer please see our contact details below.

We will need to validate the identity of anyone making an access request, to ensure that we do not provide your information to anyone who does not have the right to that information.

Gaining access to your personal information is subject to some exceptions allowed by law. Factors affecting a right to access include where:

- we reasonably believe that access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;

- access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information relates to a commercially sensitive decision making process;
- access would be unlawful;
- denying access is required or authorised by or under an Australian law or a court/tribunal order;
- access would prejudice enforcement activities or the taking of appropriate action in relation to unlawful activity or serious misconduct;
- the information relates to existing or anticipated legal proceedings between you and Killarney Co-operative Limited and would not be accessible by the process of discovery; or
- the information would prejudice negotiations with you.

There is no charge for making an access request but an administration fee may apply for providing access in accordance with your request. Your request will usually receive a response within 30 days.

### **Requesting correction of your personal information:**

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date and relevant. However, if you believe that this is not the case in relation to any personal information we hold about you have the right under the Privacy Act to request that we correct that information. If you would like to do so please contact the Killarney Co-operative Limited Privacy Officer using the contact details below.

If we do not agree with a request to correct information we hold in relation to you we will give you notice in writing as to our reasons and the mechanisms available to you to complain about our decision. You may also request us to associate a statement with that information to the effect that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading so that it is apparent to users of the information.

### **Complaints and disputes:**

If you have reason to believe that we have not complied with our obligations under the Privacy Act in relation to your personal information, we urge you to raise this with Management. There are three ways you can lodge your complaint:

#### By telephone

Call **0746641188** (within Australia) between 9am - 5pm Monday to Friday (AEST).

#### In writing

Mail your written complaint to:  
The General Manager  
Killarney Co-operative Limited  
32-42 Ivy Street, KILLARNEY QLD 4373

#### By Email

Email us at any time [info@killarneycoop.com](mailto:info@killarneycoop.com). Please do not include account numbers or other sensitive data in emails, since it may not be secure.

We will investigate all complaints and respond to you as soon as practicable. If we find a complaint justified, we will resolve it. If necessary, we will change policies and procedures to maintain our high standards of performance, service and customer care.

### **Contacting Us:**

If you wish to find out more information, or raise any specific or general concerns, about Killarney Co-operative Limited and our Privacy Policy and privacy practices, please use the contact details above.