



# Traditional Credit Union (TCU) Privacy Principles

[www.tcu.com.au](http://www.tcu.com.au)  
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# Your Guide to Privacy Principles

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TCU understands your concerns about the privacy and security of your personal information and we are committed to protecting it.

This brochure sets out our arrangements in compliance with the National Privacy Principles.

TCU offers a range of banking products and services.

TCU is committed to working with Indigenous Australians to ensure they are able to fully participate in the economic development of their communities, by providing access to high quality but culturally appropriate financial services.

TCU prides itself on providing a working environment that is culturally appropriate for Indigenous staff. Many of the recruitment practices that are followed are designed to ensure that Indigenous applicants have the best possible chance of success both in gaining employment and maintaining it.

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# Principle 1 – Collection of Your Personal Information

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TCU will not collect personal information unless the information is necessary for one or more of its functions. Additionally TCU collects information by lawful and fair means and not in an unreasonably intrusive way.

Collecting your personal information is essential for TCU to be able to conduct its business with you. Collection may occur in a number of ways, such as when you complete an application form for a product or request a product or service over the telephone.

The nature of personal information collected and maintained by TCU generally comprises information such as your name, address, contact details (including telephone, facsimile and email), date of birth, Tax File Number, details of employment and credit history.

Where possible we will collect your personal information from you. There may be circumstances where we need to collect personal information about you from another source. An example of where we may receive your personal information from another source is a Credit reporting agency.

When we collect your personal information from others, we will take reasonable steps to ensure you know that we have done this and why we have done it.

# Principle 2 – Use and Disclosure of Your Personal Information

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In general we will only use or disclose the information about you for the primary purpose for which we have collected it. If you do not consent to certain uses of your personal information, we may not be able to provide you with a particular product or service.

As with most organisations, TCU contracts some functions and activities to third party service providers (Agents). These Agents act on behalf of TCU and are bound by specific confidentiality and nondisclosure agreements. We prohibit these Agents from using your personal information to facilitate their own commercial agendas. Any personal information used by these Agents will only be used for the specific purpose for which we supply it.

## **Your Consent to Disclosure**

In certain circumstances, your consent will be obtained so that TCU can disclose your information. Your consent is important and can be express or implied. Your express consent can be written or verbal. An example of express consent may be when you sign an application for a loan.

You are giving your express consent for TCU to obtain a credit reference about you from a credit reporting agency.

You imply consent when TCU can reasonably conclude that you have given consent by some action that you have or have not taken. An example of implied consent is when you continue a telephone call to us after hearing a recorded message advising that the call may be monitored for training purposes.

### **Direct Marketing**

TCU may use your personal information to provide you with information about our extensive range of products and services that are relevant to you. If you do not want to receive any of this information simply contact us on 8999 0777 or visit a TCU Branch. Once you have told us that you no longer wish to receive this information, we will not send any further material.

### **Our Duty of Confidentiality**

TCU is committed to keeping all personal information we hold about you confidential. Our duty of confidentiality and protection of your privacy does not apply where disclosure of your personal information is:

- With your informed consent
- Required by law, for example, disclosure of your Tax File Number to the Australian Taxation Office
- In the public interest, for example, to prevent or detect the committing of a fraud or crime, to prevent or lessen a serious or imminent threat to a person's life or to prevent serious injury
- In the interests of TCU, for example, where disclosure is necessary to exercise, establish or defend a legal claim

Generally, we will not disclose your personal information to a party outside TCU unless that party is contracted to TCU to provide administrative services or activities on our behalf and that party is bound by similar privacy principles.

## **Principle 3 – Quality of Your Personal Information**

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TCU relies upon the accuracy of your personal information to provide you with the best possible service. We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date.

To assist us with this, please contact us if any of the details you have provided change. Further, if you believe that the information we have about you is not accurate, complete or up-to-date, contact us and we will endeavour to correct the information.

## **Principle 4 – Security of Your Personal Information**

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We regard the security of all of our members' personal information as paramount. To this end, we take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure.

Only authorised persons are entitled to access your personal information for approved purposes. In addition, all our staff sign a confidentiality agreement as a condition of their employment.

### Website Security and Privacy

In order to facilitate 24 hour access to our online banking facilities, we encourage the use of our website available at [www.tcu.com.au](http://www.tcu.com.au). We understand that some of our Members may be apprehensive about using this technology; however you can be confident that our website is secure. TCU's internet banking site use 128-bit encryption; ensuring data sent to and from the site is not intercepted or tampered with.

There are different methods for determining if the page or site you are accessing is secure. Some of these are:

- A yellow padlock on the bottom of the browser window is visible when you are accessing a secure site/page
- If you right click on your page and select "Properties", you can confirm the connection type is 128-bit encryption
- The web address with "https" signifies a secure site.

## Principle 5 – Management of Personal Information

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Along with TCU's website, this document outlines the kinds of personal information collected and held and the reasons for its collection. TCU maintains comprehensive internal policies to ensure compliance with these principles.

## Principle 6 – Access to Your Personal Information

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On request, we will provide you with access to the personal information we hold about you within a reasonable timeframe. If your request for access is not granted, we will explain why.

In certain circumstances we are not required to provide you with access, for example, if the law says we can deny access or where the request for access is regarded as frivolous or vexatious. If we are not required to provide you with access to the information requested, we will consider if reasonable, whether the use of a mutually agreed intermediary would allow sufficient access to meet your needs and ours.

## Principle 7 – Use of Identifiers

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TCU does not use Commonwealth identifiers such as your Tax File Number as a means of identifying the personal information that we may have collected about you. We only use Commonwealth identifiers as a means by which you may prove your identity, for example when you wish to open a bank account with us or for purposes required by law such as when we supply your Tax File Number to the Australian Taxation Office.

## Principle 8 – Anonymity

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Generally it is not possible for us to do business with you unless we have identified you and in some cases, such as when you wish to open a bank account with us, the law requires that you identify yourself to us. However, where it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously. For example, when making an enquiry about the types of products or services we offer.

## Principle 9 – Transborder Data Flows

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Generally, TCU would only send personal information outside Australia if you have consented, if it is in your interest, the transfer is required or authorised by law, or where we reasonably believe that the organisation receiving it will handle it consistent with these principles.

## Principle 10 – Sensitive Information

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If personal information concerns particular topics, it is regarded as sensitive information. Sensitive information can be information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record and health.

TCU only collects, uses or discloses sensitive information about you as is allowed by law, for example, where we have received your consent to do so or the collection is necessary for the establishment, exercise or defence of a legal claim.

## How to Contact Us

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We always strive to maintain the privacy and confidentiality of your personal information. If you feel that your privacy has been breached, please contact our Privacy Officer who will objectively investigate your complaint as soon as possible.

You can contact us in the following ways:

Email [info@tcu.com.au](mailto:info@tcu.com.au)

Telephone 8999 0777

Visit A TCU Branch

Mail TCU Privacy Officer

PO Box 40425

Casuarina NT 0811

If you would like any further information about privacy please visit the Privacy Commissioners website at [privacy.gov.au](http://privacy.gov.au)