

B I G S K Y

**privacy statement  
protecting your privacy**

september 2004

**Freedom is Belonging<sup>®</sup>**

...to a financial institution where  
it's the member that matters

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## **protecting your privacy**

Protecting the privacy of our members and the confidentiality of your Personal Information is fundamental to the way Big Sky Credit Union conducts its business.

As a financial services organisation, Big Sky treats very seriously the ongoing trust the Membership has in us to protect their Personal Information.

We have in place systems and procedures to protect our members' privacy whenever we collect, store, use or disclose your Personal Information.

The Big Sky Privacy Policy explains how we protect you, and your privacy, including:

- the importance of your consent before we disclose your Personal Information to third parties;
- how we respect your privacy in the course of using your Personal Information; and
- how your privacy is protected when you access our websites via the Internet.

Of course you have the right, where it is lawful and practicable of remaining anonymous when entering into transactions with Big Sky. However should you choose to remain anonymous we may not be able to provide you with a full range of products and services.

## **how we collect your personal information**

We collect most Personal Information directly from you. For example, we may collect Personal Information when you open an account, fill in an application form, deal with us over the telephone, send us a letter, send us an email, visit our website, or when you have contact with us in person.

The type of Personal Information we collect may include your name and may include your mailing address, telephone number, email address, tax file number, date of birth, annual income and other financial details, place of work, credit history and transaction history. In certain circumstances, we may also collect sensitive information such as health details.

There may be occasions when we need to source Personal Information about you from a third party. For example, we may collect Personal Information from a credit reporting agency or an insurer of your mortgage.

We do not collect information about your political or religious beliefs, ethnic background or sexual preferences.

## **how we use your personal information**

We collect your Personal Information to provide you with a particular product or service; for example, opening and operating a savings account.

### **we may use personal information for related purposes**

We may also use or disclose your Personal Information for purposes related or ancillary to the main reason we collect it, such as:

- servicing our relationship with you;
- internal accounting and administration;
- regulatory reporting and compliance;
- protecting you and Big Sky from error and fraud; and
- helping us to identify and inform you about other products or services that may be of benefit to you.

We may contract out some of our functions and activities; for example, we may provide names and addresses to a mailing house to mail account statements to you. In these situations, we prohibit the third parties from using Personal Information about you except for the specific purpose for which we supply it.

### **can we use your tax file number or other commonwealth agency identifiers?**

We do not use your tax file number (TFN), pension number, Medicare number or any other Commonwealth agency identifier as your account, policy or application number. We only use and disclose these numbers for the purposes required by law, such as disclosing your TFN to the Australian Taxation Office. You may use your pension number or Medicare number to prove your identity when you deal with us.

## our duty of confidentiality

We have a duty to keep confidential **all** Personal Information we hold about you, including:

- your name, address, and financial data;
- the debit or credit balance in your account; and
- details of transactions on your account.

Our duty of confidentiality applies except where disclosure of your Personal Information is:

- **compelled by law**

For example, disclosure to various Government departments and agencies such as the Australian Taxation Office, and disclosure to courts under subpoena.

- **in the public interest**

For example, where a crime, fraud or misdeed is committed or is suspected, and disclosure against the customer's rights to confidentiality is justified.

- **in Big Sky's interest**

For example, disclosure to a court in the event of legal action to which Big Sky is a party.

- **with your consent.**

## Your consent is important

Your consent can be express or implied.

Your express consent can be verbal or written; for example when you sign a loan application you are giving your express consent for us to obtain a credit reference about you from a credit reporting agency.

You imply consent when we can reasonably conclude that you have given consent by some action you take, or when you decide not to take action. We rely on your implied consent to use and disclose identifying information about you to Big Sky's service providers such as, disclosing your name and account number to a printer to personalise your cheque book or to a mail house for printing of your statements. Naturally, the confidentiality of your Personal Information is still maintained.

If you do not consent to certain uses of Personal Information, we may not be able to provide you with a particular product or service.

## Supply of information to other parties

In providing our financial services and products to you, it may be necessary for us to disclose your personal information to other organisations. We only disclose your personal information to the extent necessary and to the extent required by law. The types of organisations that we can disclose your personal information to are:

- when applying for a loan:
  - credit reporting agencies;
  - other financial institutions that have previously lent you money;
  - persons you name as referees, or your employer, in the loan application;
  - your solicitors or conveyancing agents;
  - property valuers and insurers - for property loans;
  - lenders mortgage insurers;
  - mortgage documentation service;
  - companies involved in providing securitised mortgages, such as the trustee or manager of the securitisation program;
  - your guarantor.
- when enforcing a loan:
  - debt collection agencies;
  - solicitors;
  - process servers;
  - Courts of law with jurisdiction over the enforcement of debts and securities.
- when you make a complaint to us about our services or products – our external dispute resolution centre.
- when we engage contractors for statement printing and mail out, card and cheque production, market research or direct marketing – these contractors are all subject to confidentiality agreements with us and cannot use your personal information except for our purposes.
- when we deal with other organisations with whom we have alliances or arrangements for the purpose of promoting our respective products and services, such as insurance and wealth management.

## **Direct marketing and your privacy**

From time to time we may use the Personal Information we have collected from you to identify products and services, which may be of interest to you. We may then contact you to let you know about these products or services.

If you do not wish to receive direct marketing information, you can tell us at any time.

## **we keep your personal information up-to-date**

If we have accurate Personal Information about you, it enables us to provide you with the best possible service.

We take reasonable steps to ensure that your Personal Information is accurate, complete and up-to-date whenever we collect or use it.

## **We will correct Personal Information**

If you find that current Personal Information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will correct it.

## **You can access your information**

Big Sky shall, on request, provide you with Personal Information about you which it holds, maintains and which may lawfully be provided.

We will provide you with this information unless one or all of the following situations apply.

- Providing access to the information would pose a serious threat to the life or health of any individual.
- The request for the information is frivolous or vexatious.
- The information relates to existing or anticipated legal proceedings between Big Sky and yourself.
- Provision of the information would prejudice commercial negotiations with you.
- Providing the information would be unlawful.
- The law requires or authorises us to deny you access to the information requested.

- Providing access would be likely to prejudice prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or a sanction or breaches of a prescribed law.
- Providing access would be likely to prejudice an investigation of possible unlawful activities.
- An enforcement body performing a lawful function, request Big Sky not to provide access to the information on the basis that providing it would likely cause damage to the security of Australia.
- Provision of the information would impact on the privacy of others

If access to information is denied, we will advise you of our reasons, and on what basis your request for information is being denied.

Big Sky requires that you, as clearly as possible, identify the information requested.

Big Sky may recover from you its reasonable cost of supplying you with this information.

Your request to provide information will be dealt with in a reasonable time.

## **we store your personal information securely**

We protect any Personal Information that we hold from misuse and loss. We also protect it from unauthorised access, modification and disclosure.

Only authorised users can access your Personal Information, and access is only for approved purposes.

Your Personal Information may be stored in hardcopy documents, as electronic data, or in Big Sky's software or systems.

We maintain physical security over our paper and electronic data stores and premises, such as locks and security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems.

## **Big Sky – data risk policy**

We have comprehensive security policies and procedures documented to protect our internal data. Your Personal Information will be recorded, amended and deleted only by authorised means.

Our systems are able to protect your Personal Information from misuse and loss from unauthorised access, modification or disclosure.

In addition, all employees sign confidentiality agreements as a condition of working for Big Sky.

In addition to the protection of your information that we hold, when we destroy any Personal Information that is no longer needed we shall ensure that the information is destroyed in such a manner so as to permanently de-identify you with the information.

## **Website security and privacy**

The Internet has rapidly changed the way we do business, it allows Big Sky to provide banking and financial services that you can access from the convenience of your own home or office.

We understand that you may be concerned about the confidentiality and security of the Personal Information we collect about you online. Accordingly, we have systems in place to ensure our online dealings with you are as secure and confidential as your dealings with us in person, or on the telephone.

## **About information you provide**

The type of information we collect from you will depend on what products and services you access on the website. Where specific terms and conditions for a product or service apply they will supersede this general statement to the extent they are inconsistent with it.

We may use information, including contact details, which we gather through your use of the Big Sky website for answering your queries, identifying products and services which we think may be of interest to you, tailoring the site content presented to you so it fits your expected requirements better and for marketing purposes.

We may also use your information for other purposes permitted by law or the Credit Union Code of Practice where that applies, or which you would reasonably expect, such as up-dating our records, contacting you, or for statistical purposes.

Where you apply for a particular product or service through the use of the Big Sky website the application form may contain special consents concerning the use of your information. If you give this consent, which will usually be required before the application can proceed, we may use your information as you have permitted and also for the above purposes.

In common with other financial services providers we use agents and other third parties to provide some services to us and for this purpose we sometimes need to provide them with relevant parts of the information which we have obtained from you and we require them to keep your information confidential and use it only for the purposes for which we are permitted to use it.

We may offer through our website products or services, which will be supplied by or through other organisations, and if you enquire about the service we will need to pass to them relevant details about you and your enquiry.

If you provide information to sites linked to or embedded to our internet website we may see that information but any use of it by us will be subject to this privacy statement.

## **Cookies**

As is common with most other websites, Big Sky's website may use Cookies to enhance functionality, to keep track of your visits and provide personalised features. Cookies are a standard mechanism that allows a website (or server) to deliver simple data to a client (or end user), request that the client store the information (on their PC's local hard drive) and, in certain circumstances, return the information to the website.

If you wish, you can generally configure your browser so that it does not receive Cookies but if you do so some of the functionality of the website may be lost. In particular, the use of on-line services may create the need for us to be able to identify each Member and Cookies may be used for this purpose. If you disable them, the service may not recognise you.

## **Promotional material via email**

We acknowledge and respect your choice to opt-out of receiving marketing communications from Big Sky. Should you decide you do not wish to receive marketing promotional materials via email from us, please advise us in writing including your name, address and member number.

## **Information Security**

Big Sky Credit Union takes all reasonable steps to protect your security when using its website but you should be aware that no transmission of information to and from websites is ever totally secure.

## **resolving your concerns**

### **We respond quickly to complaints**

If you believe that the privacy of your Personal Information has been compromised, you are entitled to complain. We will respond to your complaint as soon as possible. We will try to resolve the complaint within 10 working days. When this is not possible, we will contact you within that time to let you know how long we estimate it will take to resolve the complaint.

### **How to make a complaint**

If you have a complaint, contact Big Sky directly.

Phone: **1300 654 321** during normal business hours

Mail: Big Sky  
GPO BOX 1801Q  
Melbourne VIC 3001

Fax: 03 8635 2850

Web: **[www.bigsky.net.au](http://www.bigsky.net.au)**

Email: **[bigsky@bigsky.net.au](mailto:bigsky@bigsky.net.au)**

Should you be unhappy with the outcome, there is a Dispute Resolution Process in place which you can pursue. A separate brochure can be obtained from the Credit Union that provides details of this process.

## **Member Service & Telephone Banking** **1300 654 321**

**Internet Banking**  
**[www.bigsky.net.au](http://www.bigsky.net.au)**

## **Contact Big Sky**

Please contact Big Sky if you have any questions on the information provided.

Melbourne Head Office (Vic)	<b>1300 654 321</b>
Melbourne Central (Vic)	(03) 9268 4317
Western Port (Vic)	(03) 5979 6218
Homebush Bay (NSW)	(02) 8762 5721
Guildford (NSW)	(02) 9795 4625
Moranbah (Qld)	(07) 4941 5753
Bulwer Island (Qld)	(07) 3243 7332
Port Hedland (WA)	(08) 9172 5969
Newman (WA)	(08) 9175 5837
Kwinana (WA)	(08) 9419 9619

Email: **[bigsky@bigsky.net.au](mailto:bigsky@bigsky.net.au)**

**Environmentally Friendly:** This document has been printed on recycled paper.

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