SOUTHERN CROSS CREDIT UNION

01 October 2026

Privacy Policy

Southern Cross Credit Union Ltd ACN 087 650 682 ('we', 'us', 'our') is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (Privacy Act). We are also bound by Division 3 of Part IIIA of the Privacy Act, which regulates the handling of credit information, credit eligibility information and related information by credit providers, and the Privacy (Credit Reporting) Code 2024.

This Privacy Policy outlines how we deal with your personal information (including credit-related information), as well as our legal obligations and rights as to that information. If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

1. Key Types of Information

Certain words have special meanings when used in this Privacy Policy. These are shown below.

"Personal information" means information or an opinion about an identified individual or an individual who is reasonably identifiable. Although we try to make sure that all information, we hold is accurate, "personal information" also includes any inaccurate information about the individual.

"Credit eligibility information" means information that has been obtained from a credit reporting body, or that has been derived from that information, that is about an individual's credit worthiness.

"Credit information" means personal information that includes the following:

- Information about an individual, like their name, age, address and employment details, that we may use to identify that individual
- Information about an individual's current or terminated consumer credit accounts and their repayment history, or that the individual has agreed to be a guarantor
- financial hardship information
- the type and amount of credit applied for in any previous consumer or commercial credit applications to any credit provider, where that credit provider has requested information
- information about an individual from a credit reporting body
- information about consumer credit payments overdue for at least 60 days and for which collection action has started
- advice that payments that were previously notified to a credit reporting body as overdue are no longer overdue
- information about new credit arrangements an individual may have made with a credit provider, in relation to consumer credit currently or previously held, to deal with any defaults or serious credit infringements by that individual
- information about court judgements which relate to credit that an individual has obtained or applied for
- information about an individual on the National Personal Insolvency Index
- publicly available information about an individual's credit worthiness
- an opinion of a credit provider that an individual has committed a serious credit infringement of credit provided by that credit provider.

We may not hold all of these kinds of information about a particular individual. However, if we hold any of these kinds of information, it is protected as "credit information" under this Privacy Policy.

"Credit-related information" means credit information, credit eligibility information and related information.

© Copyright exists in this document

2. Collection

We may collect personal information from you by various means including in-person, by telephone, using video conferencing, by email, by letter and through our website, social media channels, mobile apps, and third party tools.

Wherever possible, we will collect personal information (including credit information) directly from you. This information will generally come from what you provide in your application for one of our products or services.

We only ask for personal information relevant to our business relationship with you. When you apply for one of our products or services, we may request:

- identifying information, like your name, address, email address and other contact details and your date of birth
- information about your financial position, like your income, expenses, savings and assets and any (other) credit arrangements
- your employment details
- your tax residency details and taxpayer identification number (including tax file number) your reasons for applying for a product or service
- your personal information (including sensitive information) in our capacity as an agent for an insurer, to assist you to arrange insurance and/or make a claim. We may also retain copies of the information collected for as long as is reasonably necessary to allow us to provide assistance to you were necessary to arrange insurance and/or make a claim.

We may also collect personal information (including credit-related information) about you from third parties, such as any referees that you provide, your employer, other credit providers and third-party service providers including credit reporting bodies. Credit reporting bodies collect credit information about individuals which they provide as credit reports to credit providers and others in the credit industry to assist them in managing credit risk, collecting debts and other activities. You can also ask a credit reporting body, through contact details on their website, not to use or disclose your personal information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud.

Some information is created through our internal processes, like credit eligibility scoring information.

Identity Verification (Document Verification Service)

We verify the identity of individuals to provide our products and services and to meet our legal and regulatory obligations. As part of this process, we may use the Document Verification Service **(DVS)**, an Australian Government identity verification service established under the Identity Verification Services Act 2023 **(Cth)**.

When we use the DVS, we collect personal information such as your name, date of birth, address and details from your identity document to confirm that this information matches government records. The DVS provides a confirmation response indicating whether the information matches.

Consent and Alternatives

We will obtain your express consent before verifying your identity using the DVS. If you do not consent, or if the DVS is unavailable, we will offer alternative methods of identity verification.

© Copyright exists in this document

3. Use

We may use your personal information (including credit-related information) for the purpose of providing products and services to you, managing our business and complying with the law. This may include:

- assessing and processing your application for the products and services we offer
- establishing and providing our systems and processes to provide our products and services to you
- executing your instructions
- charging and billing
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- research and development
- collecting overdue payments due under our credit products
- managing our rights and obligations regarding external payment systems
- marketing, to understand user journeys and interests, promote products and services, and measure the effectiveness of our communications and advertising activities, including online advertising and retargeting campaigns where permitted by law
- displaying advertisements relating to SCCU products and services on third party websites, search engines and social media platforms to individuals who have previously visited our website (commonly known as retargeting or remarketing)
- analysing website interactions to build audience segments for advertising and marketing purposes
- measuring conversions and advertising performance through approved analytics and advertising platforms

Automated Decisions

There are no kinds of these decisions that are made solely by the operation of computer programs.

We do not use (or disclose) your personal information (including credit -related information) for a purpose other than:

- a purpose set out in this Privacy Policy
- a purpose you would reasonably expect
- a purpose required or permitted by law, or
- a purpose otherwise disclosed to you to which you have consented.

4. Disclosure

We may disclose your personal information (including credit-related information) to other organisations, for example:

- our related companies
- external organisations that are our assignees, agents or contractors
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants. We may use third party service providers to support our access to and use of the DVS, such as Gateway Service Providers. Where these providers are involved in submitting identity verification requests or handling DVS results on our behalf, they act as our Information Match Agents and are required to comply with our contractual, privacy and security obligations.
- insurers and re-insurers, where insurance is provided in connection with our services to you

© Copyright exists in this document

- government bodies where scheme backed loans are provided to you and; government agencies administering support schemes, assistance programs and government-backed lending arrangements.
- superannuation funds, where superannuation services are provided to you
- other financial institutions, for example, when you apply for a loan from another credit provider and you agree to us providing information
- providers of payment and card services, when you make a transaction or receive a payment using a payment service of a card
- credit reporting bodies, including disclosing that you are in default under a credit agreement or commit a serious credit infringement, if that is the case
- lenders' mortgage insurers, where relevant to credit we have provided
- debt collecting agencies, if you have not repaid a loan as required
- our professional advisors, such as accountants, lawyers and auditors
- state or territory authorities that give assistance to facilitate the provision of home loans to individuals
- certain entities that have bought or otherwise obtained an interest in your credit product, or that are considering doing so, and their professional advisors
- any organisation with which we are considering merging
- your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you
- if required or authorised by law, to government and regulatory authorities or other organisations.

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and privacy obligations with respect to the protection of your personal information.

SCCU generally seeks to store and process personal information within Australia. However, some technology, analytics, advertising, cloud computing and software providers used by SCCU may process or store information using infrastructure located outside of Australia.

Where personal information is disclosed overseas, SCCU will take reasonable steps to ensure the recipient handles the information in a manner consistent with the Privacy Act and Australian Privacy Principles.

We may also disclose your personal information (including credit-related 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.
- you consent to third party partners, marketing agencies, advertising platforms, analytics providers and related tools for the purposes of onboarding, analytics, advertising, retargeting, audience measurement and managing data.

Where SCCU uses third party advertising and analytics platforms, limited personal information may be disclosed to those providers to facilitate analytics, audience measurement, advertising and retargeting activities. Such information may include online identifiers, IP addresses, browser information, device information, website interactions and advertising performance data.

SCCU does not intentionally disclose account numbers, transaction information, authentication credentials, credit information, repayment history information, hardship information or credit eligibility information on advertising platforms for online behavioural advertising or retargeting purposes.

© Copyright exists in this document

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

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

The Consumer Data Right gives you the right to:

- access some of the data (including personal information) held about you by us and by other data holders ('CDR Data')
- consent to an accredited third party accessing your CDR Data held by us
- consent to us accessing your CDR Data held by another data holder

We have a policy about our management of CDR Data. It is available through our website.

5. Sensitive Information

Where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information about an individual's health, and membership of a professional or trade association.

Unless we are required or permitted by law to collect that information, we will obtain your consent. However, if the relates directly to your ability to meet financial obligations that you owe us, you are treated as having consented to its collection.

6. Refusal of Credit Applications

We may refuse an application for consumer credit made by you individually or with other applicants. Our refusal may be based on credit eligibility information obtained from a credit reporting body about either you, another applicant or another person proposed as guarantor. In that case, we will give you written notice that the application has been refused on the basis of that information. We will tell you the name and contact details of the relevant credit reporting body and other relevant information.

If we obtain credit reporting information about you from a credit reporting body and, within 90 days of obtaining that information, we refuse an application for consumer credit made by you (whether alone or jointly with other applicants), we will provide you with a written notice of refusal that tells you the name and contact details of the relevant credit reporting body and other relevant information.

7. Security

We take all reasonable steps including technical and organisational measures, to ensure that your personal information (including credit-related information), held on our website or otherwise, is protected from:

- Misuse, interference and loss, and
- Unauthorised access, disclosure or modification.

Your personal information may be held by us in paper or electronic form. All personal information is stored within secure systems which are in controlled facilities. There are restrictions on who may access personal information and for what purposes. Our employees, contractors, service providers and authorised agents are obliged to respect the confidentiality of personal information held by us.

If we suspect or believe that there has been any unauthorised access to, disclosure of, or loss of, personal information held by us, we will promptly investigate the matter and take appropriate action, and we will comply with any obligations in relation to notifiable data breaches that are in force under the Privacy Act.

We ask you to keep your passwords, personal identification numbers, and other devices safe, in accordance with our suggestions.

© Copyright exists in this document

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 'Disclosure' above). You should never provide or disclose any of your passwords or personal identification numbers to any third party to enable the third party to obtain or access to 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.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we take reasonable steps to ensure that it is destroyed or de-identified.

Handling of DVS Information

Information collected for DVS identity verification is handled in accordance with the **Privacy Act 1988 (Cth)**. We do not retain identity document numbers or DVS results beyond what is reasonably necessary to complete identity verification, unless required for audit, compliance or legal purposes.

8. Website

This section explains how we handle personal information (including credit-related information) collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact our Privacy Officer, whose details are in paragraph 14 of this Privacy Policy, as there are other ways for you to provide us with your personal information.

Visiting our Website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

- the time and date of the visit
- interactions with website content
- any information or documentation that you download
- your browser type, IP address, and
- internet protocol details of the device used to access the site.

Our website may also include calculators, which may require you to enter your personal details. If you save the data you enter on the calculator, this information will be stored.

Tracking Technologies, Analytics and Online Advertisement

We may use cookies, pixels, tags, scripts and similar technologies provided by third party advertising platforms such as Google, Meta, Microsoft, LinkedIn and other digital providers. These technologies help us understand user journeys and interests, measure the effectiveness of our communications and advertising, improve website performance, display relevant advertisements to users on third party websites, applications and social media platforms.

Where permitted by law, SCCU may use these technologies to display advertisements to individuals who have previously visited our website or interacted with our content. This practice is commonly known as retargeting or remarketing.

Cookies are small text files which are placed on your internet browser and which we may access each time you visit our website or NetBanking. When you visit the secured pages of our website or NetBanking (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. You may change the settings on your browser to reject cookies, however doing so might prevent you from accessing the secured pages of our website.

© Copyright exists in this document

Tracking Pixels are tiny, invisible images embedded in websites, emails, and ads that collect data on user behaviour. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies and tracking pixels to obtain information about how our website is being used.

Tags are small pieces of tracking code placed on a website that collect data about visitor behaviour, such as pages viewed or actions taken.

Scripts are the actual code that runs in a browser to perform tasks such as tracking users, setting cookies, sending data to advertising platforms, or triggering retargeting campaigns.

Microsoft Clarity and Microsoft Advertising capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay. Measures such as masking are in place to protect sensitive data.

Platforms we use with tracking technology embedded include but are not limited to: G4 (Google Analytics), Google My Business, Google Tag Manager, Cookies management plugin, Microsoft Clarity, Instagram, Facebook, and LinkedIn.

Website analytics information may be aggregated and manually de-identified before being used to analyse trends, improve products and services, or generate statistical insights. You can request de-identification by contacting us at any time. However, this will take up to 30 days-business days as it's a manual process performed by an external third-party provider.

Retargeting and Online Behavioural Advertising

SCCU may use advertising and analytics technologies provided by organisations such as Google, Meta (Facebook and Instagram), Microsoft, LinkedIn and similar providers to deliver advertisements that may be of interest to you.

These technologies may collect information such as:

- IP address
- Browser type and version
- Device type and operating system
- Pages visited
- Links clicked
- Referral websites
- Advertising identifiers
- Approximate location information derived from IP address

This information may be used to:

- Understand website usage and customer interests
- Measure advertising effectiveness
- Create audience segments
- Display SCCU advertisements to previous website visitors
- Improve marketing campaigns and website performance

© Copyright exists in this document

SCCU does not use credit information, credit eligibility information. Repayment history information, hardship information, account balances, transaction data or authentication credentials for retargeting or online behavioural advertising purposes.

SCCU seeks to minimise the information collected and disclosed through advertising technologies to what is reasonably necessary for analytics, measurement and advertising purposes.

Artificial Intelligence

We may use artificial intelligence (AI) and automated technologies to assist with service delivery, fraud prevention, compliance, operational processes, administrative functions and marketing purposes. Where personal information is processed using AI-enabled tools, SCCU applies appropriate privacy, security and governance controls. AI technologies are used to support our employees and do not replace human oversight of significant decisions affecting customers.

Advertising Choices and Opt-Out

You may choose not to receive targeted advertising based on website activity by:

- Updating your SCCU cookie preference
- Adjusting your browser settings
- Using advertising preference settings provided by Google, Meta, Microsoft, LinkedIn or other advertising platforms
- Contacting SCCU's Privacy Officer

SCCU may make available cookie preference and privacy preference management tools through its website. Customers may manage targeted advertising and analytics preferences through these tools, browser settings, advertising platform preference settings or by contacting SCCU's Privacy Officer.

Security

We use up-to-date security measures on our website to protect your personal information (including credit-related information) . Any data containing personal, credit or related information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

Links on our Website

Our website may contain links to third party websites. The terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information (including credit-related information), you will need to obtain a copy of their privacy policy.

9. Access

You may request access to the personal information (including credit-related information) that we hold about you at any time from our Privacy Officer whose details are in paragraph 14 of this Privacy Policy.

We will respond to your request for access within a reasonable time. If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can contact our Privacy Officer if you would like to challenge our decision to refuse access.

We may recover the reasonable costs of our response to a request for access to personal information.

© Copyright exists in this document

10. Accuracy and Correction

We take reasonable steps to make sure that the personal information (including credit-related information) that we collect, hold, use or disclose is accurate, complete and up to date. However, if you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting our Privacy Officer whose details are in paragraph 14 of this Privacy Policy.

11. Marketing

Where we are permitted to do so by law. we may use your personal information, including your contact details, to provide you with information about products and services, including those of organisations, which we consider may be of interest to you, unless you request not to receive marketing communications. If you are on the Do Not Call Register, while you are our customer we will infer from our relationship with you that you consent to receiving telemarketing calls from us, unless you notify us that you do not wish to receive such calls.

SCCU may use information collected through cookies, pixels, tags and similar technologies for online advertising and retargeting activities where permitted by law. Such marketing activities are subject to any consent requirements, cookie preferences and opt-out rights as set out in this Privacy Policy.

Customers may opt-out of targeted online advertising and retargeting activities at any time using the methods described in the 'Advertising Choices and Opt-Out' section of this Privacy Policy.

You may request, at any time, not to receive marketing communications or not to receive them through a particular channel, like email. You can make this request by contacting our Privacy Officer whose details are in paragraph 14 of this Privacy Policy, or by 'unsubscribing' from our email marketing messages, which always include an unsubscribe option.

Unless we have first obtained your consent, we will not provide your personal information to other organisations to use for their marketing purposes.

To help us reach the right people with our credit marketing communications, we may ask a credit reporting body to "pre-screen" a list of potential recipients of our marketing communications against our eligibility criteria to remove recipients who do not meet those criteria. The credit reporting body cannot use information about your existing loans or repayment history in carrying out its pre-screening and it must destroy its pre-screening assessment once it has given us, or a contractor acting on our behalf, the list of eligible recipients. If you do not want your credit information used for pre-screening by a credit reporting body that holds credit information about you, you can opt-out by informing that credit reporting body, whose contact details are on their website.

12. Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Privacy Policy is available on our website.

13. Questions and Complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information (including credit-related information), please contact our Privacy Officer whose details are in paragraph 14 of this Privacy Policy. You can also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, we will respond to you as soon as possible. We will aim to deal with your complaint at the source of your complaint. If you are not satisfied with the response you receive, please let us know and we will investigate further and respond to you.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints. These are the Australian Financial Complaints Authority (AFCA), which is our external dispute resolution scheme, and the Office of the Australian Information

© Copyright exists in this document

Commissioner. Either of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

Australian Financial Complaints Authority

Post: GPO Box 3 Melbourne VIC 3001

Telephone: 1800 931 678

Website: www.afca.org.au

Or

Officer of the Australian Information Commissioner

Post: GPO Box 5288 Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

14. Privacy Officer

Our Privacy Officer's contact details are:

Address: PO Box 1602 Kingscliff NSW 2487

Telephone: 1300 360 744

Email: info@sccu.com.au

© Copyright exists in this document