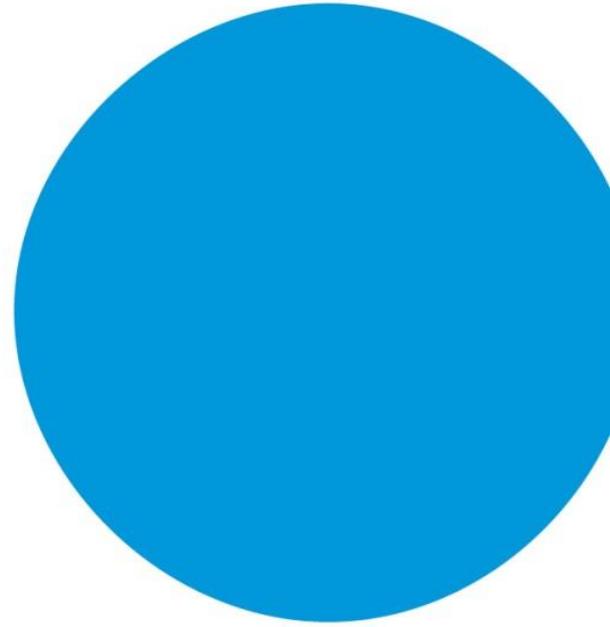


# Privacy Policy

DCT Account



indue



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## Introduction

Indue is committed to protecting the privacy of personal information. Personal information is any information or opinion about an identifiable individual (“**you**”, “**your**”).

The purpose of this policy is to describe how we deal with personal information, including personal information that is collected in connection with a DCT Account. This policy sets out:

- i. the type of information we collect and hold;
- ii. who we collect information from;
- iii. what we do with unsolicited personal information
- iv. why we collect and use personal information
- v. the types of personal information we disclose to the Commonwealth of Australia;
- vi. personal information disclosed to other third parties;
- vii. how we store personal information;
- viii. how we protect personal information;
- ix. how personal information we hold can be accessed and corrected; and
- x. our procedures for dealing with privacy complaints.

This policy covers Indue Ltd ABN 97 087 822 464 and its subsidiaries, including Lynx Financial Systems Pty Ltd ABN 70 010 983 221, Indue Aggregation Services Pty Ltd ABN 45 100 215 932 and Indue Securitisation Pty Ltd ABN 35 088 076 920 (“**Indue**”, “**we**”, “**our**”, “**us**”). You may contact us using the following details:

Post: PO Box 523, Toowong, QLD 4066

Email: [dct@indue.com.au](mailto:dct@indue.com.au)

Phone: 1800 710 265 (between the hours of 8.00am to 8.00pm Monday to Friday and 8.00am to 1.00pm Saturday AEST (Queensland time)).

Under the Privacy Act, we are bound to comply with the Australian Privacy Principles (“**APPs**”), which govern how certain entities handle personal information.

## Collecting Personal Information

### The type of personal information we collect

We collect personal information about DCT Account holders. The type of personal information we collect about DCT Account holders include:

- (1) name, date of birth, address, mother’s maiden name and other contact details;
- (2) if relevant, details about Centrelink entitlements, including the type of benefit received from Centrelink and how much is paid in benefits;
- (3) other personal details that the Account Holder provides to us or the Commonwealth of Australia provides to us, such as gender, country of birth, marital status, Centrelink Customer Reference Number or other unique identifier or details allocated by Centrelink, such as concession card details;
- (4) information about the transactions made in relation to a DCT Account, including deposits and withdrawals (including Visa Card transactions) and details about who makes and receives those deposits and withdrawals; and
- (5) external bank account details.

### Who we collect personal information from

We collect personal information from:

- (1) DCT Account holders;
- (2) the Commonwealth of Australia;
- (3) service providers who work for us to help us operate DCT Accounts; and
- (4) other participants in the financial system such as other financial institutions.

We may also collect personal information from other people, where a DCT Account holder has told us or the Commonwealth of Australia that it is alright for us to communicate with them.

## Unsolicited Information

In circumstances where we receive unsolicited personal information, we will determine whether or not we could have lawfully collected that information in accordance with the Australian Privacy Principles. If we determine that we could have, we will handle that information in accordance with this policy and the Australian Privacy Principles. This means that you have rights to access, seek correction of and make complaints in respect of our handling of that information in accordance with the procedures set out below.

## Use and Disclosure of Personal Information

### Why we collect and use personal information

We collect and use personal information to:

- (1) consider whether to provide someone with a DCT Account;
- (2) provide DCT Accounts and related services, including to resolve disputes, errors and issues in relation to a DCT Account;
- (3) identify a DCT Account holder in accordance with the law and payment scheme rules, if required;
- (4) give DCT Account holders information in relation to their account;
- (5) provide Centrelink and the Department of Social Services information in relation to DCT Account holders and their accounts;
- (6) undertake internal management and administrative activities in relation to our operation of services for Centrelink and the Department of Social Services in relation to DCT Accounts;
- (7) prevent or investigate any fraud or criminal activity (or a suspected fraud or criminal activity); and
- (8) as required by relevant laws and payment scheme rules.

### Personal Information we disclose to the Commonwealth of Australia

We may share any personal information we have collected about DCT Account holders (for example name, address, date of birth, contact details, transaction history and communications had with Indue about their DCT Account) to the Commonwealth of Australia which may use this information at its discretion to ensure restrictions are being applied effectively and to evaluate the Debit Card Trial. The Commonwealth may provide de-identified summary data to a third party evaluator as part of this process.

### Personal information disclosed to other third parties

In addition to the Commonwealth of Australia, we may provide personal information to:

- (1) outsourced service providers and distributors (for example mailing houses, fraud and anti-money laundering service providers, data switch service companies, data centre providers and organisations that distribute services on our behalf) with whom we enter into agreements to enable us to carry out our functions. Under these agreements, those providers may receive personal information, but they must safeguard it and not use it for any other purpose;
- (2) payment scheme providers such as Visa, BPAY and APCA;
- (3) regulatory bodies, government agencies, law enforcement bodies and courts;

- (4) other parties as is authorised or required by law;
- (5) other participants in the financial systems such as other financial institutions for the purpose of resolving disputes, errors or issues in relation to DCT Accounts; or
- (6) an ASIC-approved external dispute resolution scheme (such as the Credit Ombudsman Service Ltd) that may investigate a complaint an account holder has made in relation to a financial product or service that we provide.

## Storage of Personal Information

We store personal information in Australia. To facilitate transaction identification and to assist with the identification of suspicious or fraudulent transactions, we may send personal information and transaction details to a service provider overseas, such that your details may be sent to countries other than Australia. These countries may include, but are not limited to, the United Kingdom, the United States of America, Israel, the Netherlands and Spain.

There are certain laws that require us to keep certain types of information for a period of time. Subject to those requirements, we will take such steps that are reasonable in the circumstances to destroy (or make anonymous) any personal information we hold once we no longer need that information. When we destroy personal information, we do so using secure destruction facilities.

## Information Security

We maintain robust physical, electronic and procedural safeguards to protect the personal information we hold from loss, unauthorised access, modification and disclosure. These include procedures for ensuring physical security and computer system and network security. For example, appropriate locks and security systems are installed at our premises where we store personal information and the networks we manage are protected by firewalls that undergo penetration testing at regular intervals.

Authorised Indue personnel are provided with access to personal information only as necessary to perform their roles and these personnel have agreed to ensure the confidentiality of the information they handle. Staff also undertake privacy training at regular intervals.

As a financial institution that deals with financial information and card data, we are subject to various security standards and guidelines set by the payment industry and the Australian Prudential Regulation Authority. Our systems and procedures undergo regular audits in order to identify risks to information security so that we can take reasonable steps to mitigate and eliminate any such risks.

Our websites may contain links to other sites. Indue is not responsible for the privacy practices or the content of such web sites. We encourage you to read the privacy statements of any linked sites as their privacy policy may differ from ours.

## Access to and correction of personal information

### Access to personal information

With some exceptions, if we hold personal information about you, you have the right to find out what that information is and request us to correct or update the information if necessary.

Please contact us using the contact details set out on page 1 of this policy if you would like to find out what information we hold about you. Before considering whether we can grant you access, we will need to verify your identity.

There may be circumstances when we are unable to let you know what information we hold about you. For example, we will be unable to grant access where to do so would violate the privacy of another individual. We may also be unable to grant you access if we cannot verify your identity.

In the circumstances above, we will write to you to explain the reason and, if possible, we will endeavour to assist you in finding another way to access your information.

Otherwise, we will grant you access within a reasonable period of time after you request the information. This will usually be within 30 days of your request. If reasonable and practicable, we will provide you with access in the manner you requested.

## Correction of personal information

Please contact us using the details set out on page 1 of this policy if you think that any of the information we hold about you is incorrect or out-of-date. If you request us to correct any of your information, we will respond to your request within a reasonable period of time and we will not charge you for correcting or updating your information.

You may also request that we notify another relevant organisation (for example, an outsourced service provider mentioned above) to whom we have disclosed your personal information in circumstances where we correct that information. In that case, we will take steps (if reasonable) to notify that organisation of the correction so that it may also update its own records.

In circumstances where we refuse to correct or update your personal information as you request, we will write to you to explain the reasons for the refusal (if reasonable) and provide details to you about how you may complain about the refusal. Details about how you may complain about our handling of personal information, including in relation to any request for access or correction, are set out below.

## Complaints

Although we take every reasonable care to ensure the privacy of your personal information, there may be circumstances when you have a concern or complaint. If you have a complaint that relates to any personal information we hold about you, please contact us using the following details:

Post: PO Box 523, Toowong, QLD 4066

Email: [dct@indue.com.au](mailto:dct@indue.com.au)

Phone: 1800 710 265 (between the hours of 8.00am to 8.00pm Monday to Friday and 8.00am to 1.00pm Saturday AEST (Queensland time)).

Where possible, we will endeavour to resolve your complaint within 5 business days of receiving your complaint. However, where that is not possible, we will acknowledge receipt of your complaint within 5 business days and advise you of our estimate of how long it will take to resolve your concern. We will then investigate the complaint and advise you of the outcome in writing.

If you are not satisfied with the resolution of your complaint, you may (in some circumstances) be able to have it heard by the Credit Ombudsman Service Ltd (“**COSL**”), which is an independent external dispute resolution scheme of which Indue is a member. To find out whether your complaint falls within the scope of what COSL can investigate, please contact COSL using the following details:

Website: [www.creditombudsman.com.au](http://www.creditombudsman.com.au)

Phone: 1800 138 422 or 02 9273 8400

Mail: PO Box A252  
Sydney South NSW 1235

Fax: 02 9273 8440

Alternatively, you may contact the Office of the Australian Information Commissioner (“**OAIC**”). The OAIC may be contacted using the following details:

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Phone: 1300 363 992

Mail: GPO Box 5218  
Sydney NSW 2001

Fax: 02 9284 9666

PO Box 523, Toowong QLD 4066

phone 1800 710 265

email [dct@indue.com.au](mailto:dct@indue.com.au)

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