

# STEWARDS' FOUNDATION OF CHRISTIAN BRETHREN

## PRIVACY POLICY

### INTRODUCTION

Stewards' Foundation of Christian Brethren ABN 57 246 942 907 (Stewards) is a company incorporated under an Act of the NSW Parliament, the Stewards' Foundation of Christian Brethren Act 1989 No.172 (Act).

The Stewards Privacy Policy

- affirms Stewards' commitment to protecting and managing personal information held about Stewards customers by adherence to the applicable Australian Privacy Principles, procedures and training;
- sets down Stewards' obligations under the Privacy Act 1988, and the Australian Privacy Principles (APP); and
- aims to provide an understanding of the Australian Privacy Principles, and how they impact on Stewards' operations.

### LEGAL REQUIREMENTS

The Privacy Act 1988 (Commonwealth) as amended, includes the Australian Privacy Principles as detailed in this Policy, and sets the standards for the way organisations handle personal information. The Privacy Act also gives the office of the Australian Information Commissioner a general power to make Guidelines to help organisations avoid breaching the Act.

### OUR PRIVACY POLICY

This Stewards' Privacy Policy sets out in detail the Stewards policies on the management of personal information.

This Policy is designed to inform customers of –

- The Stewards Privacy Policy;
- What information we collect and the purposes for which we collect it;
- Use and disclosure of information collected;
- Security of your personal information;
- Gaining access to information we hold about you;

- What to do if you believe the information we hold about you is inaccurate;
- Complaints in relation to privacy; and
- How to contact us.

## **PERSONAL INFORMATION**

Personal information is information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Stewards will also collect any personal information necessary for the purposes of complying with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Information generally collected by Stewards includes the following (depending on the nature of the service(s) provided):

- your name, address and contact details;
- your e-mail address;
- your tax file number;
- Bank account details;
- Identification and verification information;
- Credit reference information (where applicable); and
- details of specific transactions.

## **OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION**

Stewards seeks to ensure that personal information we hold about an individual is managed in an open and transparent manner. We have implemented procedures to ensure compliance with the Australian Privacy Principles and any applicable codes, and to deal with any complaints relating to our compliance therewith.

Stewards has a clear and up-to-date privacy policy outlining our management of personal information, including details regarding the kind of personal information we collect and hold; how and why we collect and hold this information, and how an individual may access and seek correction of the information we hold about them. We further provide details regarding our complaints handling process, our policy on disclosure of information to overseas recipients (and if so, which countries).

## **COLLECTION OF PERSONAL INFORMATION**

This policy details how Stewards adheres to the Australian Privacy Principles regarding the collection of solicited personal information. Stewards only collects personal information

directly from individuals, which is reasonably necessary for the provision of our services, and only by lawful and fair means. Generally, your information will be collected when you fill out an application form for a product or service or when you give us personal information over the telephone, by email, through the website or in face to face interviews or via other electronic means, including social networking forums.

We will always ensure you are apprised of our purpose in collecting information, and your right to gain access to such information. If you do not provide the information requested, we may be unable to provide you with our services.

Please note that generally we will only use the personal information (e.g. postal address, e-mail address, telephone numbers, facsimile number, date of birth, bank account details, TFN, details related to the provision of credit, verification and identification documentation) we collect for the main purposes disclosed at the time of collection such as to provide financial services or credit services.

Where possible we will collect the information directly from you but certain information may be collected about you from other sources, including a related, affiliated or associated body, or for example, a credit reference from a credit reporting agency to obtain information about your financial position when you apply for a loan.

We may also collect information about you from our web site but this information will only identify who you are if you provide us with your details (eg. if you e-mail your contact details to us). When you visit our web site our web server collects the following types of information for statistical purposes:

- your Internet service provider's address;
- the number of users who visit the web site;
- the date and time of each visit;
- the pages accessed and the documents downloaded;
- the type of browser used.

No attempt is made to identify individual users from this information.

The Stewards web site may contain links to the web sites of third parties. If you access those third party web sites they may collect information about you. You will need to contact them to ascertain their privacy standards.

### **Cookies**

A cookie is a small text file placed on your computer hard drive by a web page server. Cookies may be accessed later by our web server. Cookies store information about your use of our web

site. Cookies also allow us to provide you with more personalised service when using our web site.

Stewards may use cookies to:

- determine whether you have previously used the Stewards web site;
- identify the pages you have accessed; and
- facilitate administration of the site and for security purposes.

Most web browsers are set to accept cookies but you may configure your browser not to accept cookies. If you set your browser to reject cookies you may not be able to make full use of the Stewards web site.

### **E-mail address**

If you provide us with your e-mail address during a visit to our web site it will only be used for the purpose for which you provided it to us. It will not be added to a mailing list without your consent unless the mailing list is related to the purpose for which you provided your e-mail address to us. We may use your e-mail address, for example, to provide you with information about a particular service or respond to a message you have sent to us.

If you subscribe to one of our services and provide your e-mail address to us so that we may communicate with you through e-mail, we may also use your e-mail address to advise you of upgrades and changes to those services.

## **CREDIT CHECKS**

Stewards may also collect personal information for Credit Checks which may involve the following:

- obtain from a credit reporting agency a credit report containing information about your personal credit worthiness for the purpose of verifying your identity, assessing your application for a loan and for the purpose of assisting in collecting overdue payments; and
- obtain information about your commercial activities or commercial creditworthiness from any business which provides information about the commercial credit worthiness of persons, your accountant, a related, affiliated or associated body, or any other supplier to you.

Please note that credit providers like Stewards can now provide information about you to credit reporting bodies, including how much you have borrowed and whether you fail to meet your loan repayment obligations, in order to enable a more comprehensive credit assessment.

You can request a copy of your credit file from credit reporting bodies, and request a copy of the credit-related information we hold about you. You can also request us to correct any inaccurate information, or lodge a complaint with us relating to such information.

### **UNSOLICITED PERSONAL INFORMATION**

Where we receive personal information about an individual which is unsolicited by us and not required for the provision of our services, we will destroy the information (provided it is lawful and reasonable for us to do so).

### **NOTIFICATION OF THE COLLECTION OF PERSONAL INFORMATION**

When we obtain personal information about you, we ensure that you have our contact details and that you are aware of the collection of information and our purposes for doing so. As per above, we are unable to provide certain services if the requested information is not provided. We do not disclose your information to third parties, unless they are related entities or services providers, in which case they are required to conform to our procedures.

### **USE AND DISCLOSURE OF PERSONAL INFORMATION**

Stewards collects and holds personal information about an individual for the purpose of providing financial or credit services. We collect this information with your consent as per our service documentation, for the primary purpose disclosed to you at the time of collection.

However, in some cases Stewards will use or disclose personal information for secondary purposes (any purpose other than a primary purpose). Personal information obtained to provide financial or credit services may be applied to secondary purposes if the secondary purpose is related to the primary purpose of collection and the person concerned would reasonably expect the personal information to be used or disclosed for such secondary purpose. Stewards may provide your personal information to third parties in order to provide you with financial services and the provision of credit.

In some cases we may ask you to consent to any collection, use or disclosure of your personal information. Your consent will usually be required in writing but we may accept verbal consent in certain circumstances. We may also disclose your personal information where it is required or authorised by law.

### **DIRECT MARKETING**

Stewards will only use personal information obtained for the provision of financial or credit services, for the secondary purpose of direct marketing where:

1. Stewards collected the personal information from the individual; and
2. The individual would reasonably expect Stewards to use or disclose the information for the purpose of direct marketing; and
3. Stewards provides a simple means through which an individual can request to not receive marketing communications; and
4. The individual has NOT requested such communications cease.

Please note that Stewards allows an individual to opt out of the receipt of direct marketing in each direct marketing communication. You can change your mind about receiving information at any time by contacting us on Ph. (02) 8775 3100 or by email to [admin@stewardsfoundation.com.au](mailto:admin@stewardsfoundation.com.au). Often the law requires us to advise you of certain changes to products/ services or regulations. You will continue to receive this information from us even if you choose not to receive direct marketing information from us. We will not disclose your information to any outside parties for the purpose of allowing them to directly market to you.

#### **CROSS BORDER DISCLOSURE/SENSITIVE INFORMATION/USE OF GOVERNMENT IDENTIFIERS/ANONYMITY & PSUEDONYMITY**

Stewards does not, for the purposes of the Privacy Act, transfer personal information overseas nor does it collect sensitive information. Wherever lawful and practicable, individuals may deal anonymously with Stewards but given the nature of our investment and credit services, it is unlikely that this will be a viable option. Stewards does not use official identifiers (e.g. tax file numbers) to identify individuals. An individual's name or Australian Business Number is not an identifier for the purposes of the Privacy Act and hence may be used to identify individuals.

#### **QUALITY OF PERSONAL INFORMATION**

Stewards takes all reasonable steps to ensure the personal information held about individuals is accurate, up-to-date and complete. We verify personal information at the point of collection. The accuracy of records is also maintained by regular mail-out of statements and the periodic roll-over of commercial loans.

Stewards encourage you to help us by telling us immediately if you change your contact details (such as your phone number, street address or email address) or if any of your details need to be corrected or updated. A person wishing to update their personal information may contact our staff or the Privacy Officer on the contact details shown within this document.

## ACCESS TO PERSONAL INFORMATION

Where a person requests access to their personal information, our policy is, subject to certain conditions (as outlined below) to permit access. Stewards will correct personal information where that information is found to be inaccurate, incomplete or out of date. We will not charge an individual for reasonable access and correction requests. If a person wishes to access their personal information or correct it, they should contact the Privacy Officer, and we will seek to provide such information within a reasonable period of time, and in the manner so requested (where reasonable to do so).

Stewards may not always be able to give you access to all the personal information we hold about you. If this is the case, we will provide a written explanation of the reasons for our refusal, together with details of our complaints process for if you wish to challenge the decision.

We may not be able to give you access to information in the following circumstances:

- a. Where we reasonably believe this may pose a serious threat to the life, health of safety of any individual or to public health/safety;
- b. Which would unreasonably impact the privacy of another individual;
- c. Where such request is reasonably considered to be frivolous or vexatious;
- d. Which relates to existing or anticipated legal proceedings which would otherwise not be accessible in the discovery process relating to such proceedings;
- e. Which would reveal our intentions and thereby prejudice our negotiations with you;
- f. Which would be unlawful;
- g. Which is prohibited by law or a court/tribunal order;
- h. Which relates to suspected unlawful activity or serious misconduct, where access would likely prejudice the taking of appropriate action in relation thereto;
- i. Where enforcement activities conducted by or on behalf of an enforcement body may be prejudiced; or
- j. Where access would reveal details regarding a commercially sensitive decision-making process.

## CORRECTION OF PERSONAL INFORMATION

Where Stewards believes information we hold about an individual is inaccurate, out-of-date, incomplete, irrelevant or misleading, OR an individual requests us to correct information held about them, Stewards will take all reasonable steps to correct such information in a reasonable time frame. No fees are payable for such requests. If you request us to similarly advise a relevant third party of such correction, we will facilitate that notification unless impracticable or unlawful for us to do so.

If Stewards intends to refuse to comply with your correction request, we will notify you in writing of our reasons for such refusal, and the complaints process you may avail if you wish to challenge that decision. You may also request that we associate the personal information we hold with a statement regarding your view of its inaccuracy.

## **SECURITY OF PERSONAL INFORMATION**

We take reasonable steps and precautions to keep personal information secure from loss, misuse, and interference, and from unauthorised access, modification or disclosure

Personal information in hard copy is stored in Stewards' offices and offsite storage facilities. Personal information imaged and stored on electronic databases requires password access and access is restricted to authorised personnel. The Stewards legal advisers may also store some personal information and we are assured that their premises are secure.

Where information is no longer required to be held or retained by Stewards for any purpose or legal obligation, we will take all reasonable steps to destroy or de-identify the information accordingly.

## **PRIVACY COMPLAINTS**

If you have a complaint relating to our compliance with privacy laws or our treatment of your personal information, please contact our Privacy Officer by telephone: (02) 8775 3100 or by email to [admin@stewardsfoundation.com.au](mailto:admin@stewardsfoundation.com.au). We will respond to all complaints within two (2) days and aim to have them resolved with ten (10) days. Where this is not possible, you will be contacted and advised when it is likely your complaint will be resolved.

If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with the Office of the Australian Information Commissioner by telephoning 1300 363 992 or visiting their website at [www.oaic.gov.au](http://www.oaic.gov.au)