

Privacy Policy

Effective 7 March 2025



G&C Mutual Bank Limited trading as Unity Bank & Reliance Bank.
ABN 72 087 650 637. AFSL & Australian Credit Licence 238311.

Introduction

G&C Mutual Bank Limited (ABN 72 087 650 637) trading as Unity Bank and Reliance Bank ('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 by the Privacy (Credit Reporting) Code 2014.

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.

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 an 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;
- 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 an individual on the National Personal Insolvency Index;
- information about court judgments which relate to credit that an individual has obtained or applied for;
- publicly available information about an individual's credit worthiness; and
- an opinion of a credit provider that an individual has committed a serious credit infringement of credit provided by that credit provider.

Your credit report will usually only contain information from the past 5 years. It may contain information from up to the past 7 years if you have committed a serious credit infringement.

We may ask you to explain why your credit report differs from what you have told us about your financial history

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.

Collection of personal information

We may collect personal information from you by various means including in-person, by facial image captured by cameras on our property (including ATMs), by telephone, using video conferencing, by email, by letter and through our website, social media channels, and mobile apps. Some information is needed for legal reasons, such as our obligation to identify you, keep a record of transactions and make sure we are adhering to responsible lending. In addition, some information is required for managing risks, such as reducing fraud on your accounts.

Wherever possible, we will collect personal information (including credit-related information) directly from you. This information

will generally come from what you provide in your applications for membership and/or 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 – your name, address, other contact details, date of birth or passwords, passcodes and secret questions used to confirm your authorisation of a transaction;
- Information about your financial position - your income, expenses, assets and liabilities (other credit arrangements);
- Employment details;
- Government identifiers – drivers license, passport and medicare;
- Tax information - residency details and taxpayer identification number (including tax file number);
- Health, Lifestyle and behavioural information – such as where relevant to insurance or a loan application;
- Transaction records – including where you spend your money
- Credit information – including information on your loan accounts and balances, your repayment and default history and any financial hardship arrangements
- your reason(s) for applying for a product or service.

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.

We use this information to determine whether or not you are eligible for credit and to create an “unsuitability assessment” as required by law. Without collecting this information we can’t approve loan 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.

Use of personal information

We may use your personal information (including credit-related information) for the purpose of providing products and services to you and managing our business. 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;
- administering your accounts, including executing your instructions and providing you with periodic statements;
- setting up payment instructions, charging and billing;
- managing our rights and obligations regarding external payment systems, which includes processing payments to email addresses, mobile phone numbers and PayID names under the New Payments Platform (NPP);
- comply with our legal obligations (including to assist law enforcement agencies or regulators where we are required to do so);
- protect the safety and security of our staff and visitors;
- maintaining and developing our business systems and infrastructure;
- research and development;
- assessing your credit worthiness (as a borrower or guarantor) and helping to manage your loan (including overdue payments);
- conduct market and demographic research in relation to the products and services our members acquired from us or third parties we have agreements with; and
- information on products that may be relevant to you, including marketing or contacting you to discuss partially completed online applications.

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.

Disclosure to other organisations

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;
- organisations which we use to verify your identity, including checking your information with the document issuer or official record holder;
- external service providers to us, such as payment systems operators, mailing houses and research consultants;
- providers of payment and card services, when you make a transaction using a payment service or a card;
- entities that help identify illegal activities and prevent fraud;
- insurers and re-insurers, where insurance is provided in connection with our services to you;
- other financial institutions, for example, when you apply for a loan from another credit provider and you agree to us providing information;
- credit reporting bodies, including disclosing that you are in default under a credit agreement or commit a serious credit infringement;
- lenders' mortgage insurers, where relevant to credit we have provided to you;
- debt collecting agencies, if you have not repaid a loan as required;
- our professional advisors, such as accountants, lawyers, valuers, and auditors, conveyancers and agents who represent you;
- state or territory authorities that give assistance to facilitate the provision of home loans to individuals such as the Commonwealth to meet the requirements for the SME Guarantee Scheme, Housing Australia as part of the First Home Loan Deposit Scheme, the NSW Government under the Shared Equity Home Buyer Helper Scheme and the Victorian Government under the Victorian Homebuyer Fund;
- certain entities that have bought or otherwise obtained an interest in your credit product, or

that are considering doing so, and their professional advisors;

- contractors for statement printing and mail out, card and cheque production, market research or direct marketing;
- affiliated product and service suppliers to provide information to you about their services and product;
- mortgage documentation services;
- trustees and managers of securitised loan programs;
- any organisation with which we are considering merging;
- your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you; or
- if required or authorised by law, to government and regulatory authorities.

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.

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.

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, or makes available 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 credit reporting bodies that we disclose information to are Equifax and illion.

If you do not make your repayments when they fall due or commit a serious credit infringement, we may be able to disclose this to Equifax and illion. This may include information about whether you make repayments on time and

whether your obligation to make those payments has been affected by a financial hardship arrangement. Any information that we provide to these bodies may be included in reports provided to credit providers to help them assess your creditworthiness.

You can ask Equifax and illion to not use your information for pre-screening of direct marketing by a credit provider. You can also ask them not to use or disclose your information if you reasonably believe that you have been or are likely to be a victim of fraud.

Contact details:

Equifax

Phone: 13 83 32

Mail: PO Box 964, North Sydney, NSW 2059.

Website: www.equifax.com.au

illion

Phone: 13 23 33

Mail: PO Box 7405, St Kilda Rd, Melbourne, VIC 3004

Website: www.illion.com.au

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.

Disclosure to overseas recipients

Our service providers include businesses that are either based overseas or use overseas or cloud-based data storage, meaning your information may be disclosed to or stored in countries such as the United Kingdom, the Netherlands, Belgium, the United States of America, Singapore, New Zealand, India, Norway, Canada, Japan, Serbia and the Philippines. Additionally, the Bank may sometimes send your information overseas to:

- Service providers or third parties operating outside Australia for data storage
- Complete international transactions, such as currency exchanges
- Partner organisations assisting us in providing products and services
- Comply with legal obligations or assist government or law enforcement agencies
- If we disclose your information internationally, the Bank ensures that appropriate privacy, data handling, and security measures are in place to protect your

information.

Consumer Data Right

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; and
- consent to us accessing your CDR Data held by another data holder.

We have a policy about our management of CDR Data that is available through our website. You can also get an electronic or hard copy from us on request.

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 or information regarding your personal circumstances such as vulnerability and financial difficulties where we consider it reasonably necessary to provide you with products and services.

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

Security

We take all reasonable steps 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 within secure systems in controlled facilities. Our security systems guard against unauthorised access, and access to your personal information is limited to employees on a need basis. All personal information is protected by restrictions on who may access it 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, tokens and other devices safe, in accordance with our suggestions.

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 Disclosures to other organisations). 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.

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 detail are available in the Questions and Complaints section 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;
- any information or documentation that you download;
- your browser type; 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.

Cookies

A “cookie” is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (i.e. pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (i.e. public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, but doing so might prevent you from accessing the secured pages of our website.

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.

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 the Questions and Complaints section 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.

Accuracy

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 the information by contacting our Privacy Officer whose details are in the Questions and Complaints section of this Privacy Policy.

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 other organisations, which we consider may be of interest to you, unless you request not to receive marketing communications.

Marketing material can be delivered by a range of methods including SMS, email, online advertising and social media in accordance with the Spam Act 2001 (Cth) and the Privacy Act. If you receive marketing material from us and do not wish to receive this information any longer, please contact us directly or use the unsubscribe facilities included in our marketing communications.

Where applicable, you can opt out from receiving marketing material from us, by using the applicable 'unsubscribe' functionality or by contacting us directly.

Please note that marketing material does not include important information about your account. If you are a member of the Bank, we will use your personal information to send you messages containing important information about your account. These messages are an important part of the service that we provide to you and will be sent to you as long as you hold an account with us. Members with an account cannot opt-out of receiving these important messages.

We will not disclose any sensitive information about you for the purposes of direct marketing unless you have consented to the use or disclosure of the information for that purpose.

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.

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 using the details below. 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.

Phone: 1300 364 400 or 1300 36 2000

Mail: PO Box A253, Sydney South NSW 1235 or PO Box K237 Haymarket, NSW 1240 (attention to the Privacy Officer)

Email: info@gcmutual.bank or mail@unitybank.com.au

In person: Visit one of our Service Centre locations

Online: Form through our website or secure messaging in Online Banking

Website: www.gcmutual.bank or www.unitybank.com.au

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 not satisfied with the way in which we resolve your complaint or the speed at which we respond, please raise this with our Privacy Officer. If your complaint is still unresolved after 30 days, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA), which is an independent external dispute resolution body that is free to consumers or the Office of the Australian Information Commissioner. Contact details are as follows:

Australian Financial Complaints Authority (AFCA)

Phone: 1800 931 678

Mail: GPO Box 3, Melbourne, VIC 3001

Email: info@afca.org.au

Website: www.afca.org.au

**Office of the Australian Information
Commissioner**

Phone: 1300 363 992

Mail: GPO Box 5218, Sydney, NSW 2001

Website: www.oaic.gov.au