

# Bankwest Privacy Policy

## How we handle your information



Bankwest, a division of Commonwealth Bank of Australia  
ABN 48 123 123 124 AFSL/Australian credit licence 234945

### What you need to know

#### 1. About Bankwest

Bankwest is a division of the Commonwealth Bank of Australia (CBA) which has subsidiaries (the Group) that provide banking, finance, insurance, funds management, financial planning and advice, superannuation, stockbroking and other services. The Group includes Bankwest, CBA, CommSec, CommInsure, Commonwealth Financial Planning, Financial Wisdom, Count Financial and Colonial First State businesses.

Australian members of our Group are bound by the Privacy Act and the Australian Privacy Principles (APPs). CBA has a separate but consistent privacy policy which can be viewed at [www.commbank.com.au](http://www.commbank.com.au).

For more information about the Group, including a complete list of Group members, see the Commonwealth Bank of Australia's latest Annual Report, available at [www.commbank.com.au/shareholders](http://www.commbank.com.au/shareholders)

In addition to the Privacy Act, individuals located in the European Union (EU) may also have rights under EU based rules known as the General Data Protection Regulation (GDPR). The GDPR has harmonised the data privacy laws of each individual EU country, giving more rights to individuals located in the EU and more obligations to organisations holding their personal information.

Details of additional rights of individuals located in the EU and how we meet them are outlined in Appendix 1.

We take privacy seriously and are committed to ensuring the protection of your personal information, no matter where you are located.

#### 2. Your privacy is important to us

We understand that your privacy is important to you, and we value your trust. That's why we protect your information and aim to be clear about what we do with it. This policy explains how we handle your personal information. It also includes:

- › Our policy on the handling of credit reports and other credit information
- › Key information about credit reporting matters

During your relationship with us, we may tell you more about how we handle your information. For example, when you complete an application or claims form, or receive terms and conditions or a Product Disclosure Statement. You should always read these documents carefully.

Sometimes we update our privacy policy. You can always find the most up-to-date version on our website.

#### 3. What information do we collect?

##### Information we collect from you

We collect personal information about you when you contact us, use our products or services, visit our websites or use our mobile apps or deal with us in some other way.

- › The information we collect from you may include:
  - › Information about your identity — including your name, address, date of birth, gender and marital status
  - › Your Tax File Number or tax residency status
  - › Health information — for example for insurance purposes
  - › Financial and transaction information
  - › When you visit our websites or use our mobile apps — your location information, IP address and any third-party sites you access. Some of this website information we collect using Cookies (for more information please see the Website Terms of Use at [www.bankwest.com.au/terms-conditions](http://www.bankwest.com.au/terms-conditions)).
  - › Other personal information, such as details of your interactions with us.

##### Information we collect from others

We collect information about you from others, such as:

- › Service providers
- › Agents
- › Advisers
- › Brokers
- › Employers
- › Companies or bodies that you own shares in or have an interest in
- › Family members.

For example, if you apply for credit, we may ask a credit reporting body for your credit report. If you apply for life or income protection insurance, we may ask you or your doctor for your medical information. We may also collect information about you that is publicly available (for example, in public registers or on social media) or provided by businesses we deal with.

### Sensitive information

The Privacy Act protects your sensitive information — such as information about your religion, ethnicity, health or biometrics (for example, your fingerprints). If we need this type of information, we will ask for your permission — except where otherwise allowed by law.

### 4. How do we use your information?

We collect, use and exchange your information so that we can:

- › Confirm your identity
- › Assess your application for product and service
- › Design, manage, price and provide our products and services
- › Manage our relationship with you
- › Minimise risks and help identify and investigate fraud and other illegal activities
- › Contact you, for example, when we need to tell you something important
- › Improve our service to you and your experience with us
- › Comply with laws, and assist government and law enforcement agencies
- › Manage our businesses.

We may also collect, use and exchange your information in other ways where permitted by law.

### Bringing you new products and services

From time to time, we may also use your information to tell you about products and services we think you might be interested in. To do this, we may contact you by:

- › Email
- › Phone
- › SMS
- › Social media
- › Advertising through our apps, websites, or third party websites
- › Mail.

If you don't want to receive direct marketing messages or want to change your contact preferences, please call **13 17 19**.

### Using data to give you better customer service

We're always working to improve our products and services and give you the best customer experience.

New technologies let the Group members combine information we have about you and our other customers, for example transaction information, with data from other sources, such as third party websites or the Australian Bureau of Statistics. We analyse this data to learn more about you and other customers, and how to improve our products and services.

We sometimes use this combined data to help other businesses better understand their customers. When we do, we don't pass on any personal information about you.

### 5. Who do we share your information with?

We may share your information with other members of the Group. This helps us offer you a high-quality customer experience. You can read about how Group members may use your information in **Section 4**.

We may also share your information with third parties for the reasons in **Section 4** or where the law otherwise allows.

These third parties can include:

- › Service providers — for example mortgage insurers, loyalty program redemption partners and our product distributors
- › Businesses who do some of our work for us — including direct marketing, statement production, debt recovery and IT support
- › Brokers, agents and advisers and persons acting on your behalf — such as your parent (if you are under 16), guardian or a person with Power of Attorney
- › Guarantors and other security providers
- › Organisations involved in our funding arrangements — like loan purchasers, investors, advisers, researchers, trustees and rating agencies
- › People who help us process claims — like assessors and investigators
- › Other banks and financial institutions — for example, if we need to process a claim for mistaken payment
- › Auditors, insurers and re-insurers
- › Current employers or previous employers — for example, to confirm your employment
- › Government and law enforcement agencies or regulators
- › Credit reporting bodies and credit providers
- › Organisations that help identify illegal activities and prevent fraud
- › Other people using the same account, like joint applicants or joint account holders or cardholders.

### Sending information overseas

Sometimes, we may send your information overseas, including to:

- › Overseas businesses that are part of the Group
- › Service providers or third parties who store data or operate outside Australia
- › Complete a transaction, such as an International Money Transfer
- › Comply with laws, and assist government or law enforcement agencies.

If we do this, we make sure there are arrangements in place to protect your information. You can find out about which countries your information may be sent to at [www.commbank.com.au/security-privacy/country-list.pdf](http://www.commbank.com.au/security-privacy/country-list.pdf)

## 6. Credit checks and credit reporting

When you apply to us for credit to be a guarantor, we may need to check your credit reports.

A credit report gives us information about your credit history. Credit reports are provided by credit reporting bodies, who collect and share credit information with credit providers like us, and other service businesses like phone companies.

The Privacy Act limits the information that we can give to credit reporting bodies, and that they can give us. The Act also limits how we can use credit reports.

The information we can share with credit reporting bodies includes:

- › Your identity
- › Type and amount of credit you have — like credit cards, home loans, or personal loans
- › How much you've borrowed
- › If you've made all your repayments
- › If you've committed fraud or another serious credit infringement.

Credit reporting bodies include this information in their credit reports to assist other credit providers assess your credit worthiness.

We can also ask credit reporting bodies to give us your overall credit score, and may use credit information from credit reporting bodies together with other information to arrive at our own scoring of your ability to manage credit.

The credit reporting bodies we use are Equifax Pty Ltd, Experian Australia Credit Services Pty Ltd and Illion, formerly known as Dun & Bradstreet. You can download a copy of their privacy policies at:

- › Equifax — [equifax.com.au/privacy](http://equifax.com.au/privacy)
- › Experian — [experian.com.au/legal/privacy.html](http://experian.com.au/legal/privacy.html)
- › Illion — [dnb.com.au/privacy-policy.html](http://dnb.com.au/privacy-policy.html)

### What do we do with credit information?

We use information from credit reporting bodies to:

- › Confirm your identity
- › Assess your credit applications
- › Assess your ability to manage credit
- › Manage our relationship with you
- › Collect overdue payments.

We keep your credit information with your other information. You can view this information or ask us to correct it if it's wrong (see **Section 8**) or make a complaint to us (see **Section 9**).

### Other rights you have

Direct Marketing — Credit providers like us can ask credit reporting bodies to use your credit information to pre-screen you for direct marketing purposes, but you can tell credit reporting bodies not to (see **Section 10**).

Preventing identity fraud — if you think you have been or could be a victim of fraud — for example, if someone else may be using your name to apply for credit — you can ask the credit reporting body not to use or give anyone your credit information.

## 7. Keeping your information secure

We store your hard-copy or electronic records in secure buildings and systems, or using trusted third parties. Here are some of the things we do to protect your information:

Staff training	We train our staff to keep your information safe and secure.
Secure handling and storage	When we send information overseas or use third parties that handle or store data, we put arrangements in place to protect your information.

System security	<p>When you log into our websites or apps, we encrypt data sent from your computer to our systems so no one else can access it.</p> <p>We have firewalls, intrusion detection and virus scanning tools to stop viruses and unauthorised people from accessing our systems.</p> <p>When we send your electronic data to other organisations, we use secure networks or encryption.</p> <p>We use passwords and/or smartcards to stop unauthorised people getting access.</p>
Building security	<p>We use a mix of alarms, cameras, guards and other controls in our buildings to prevent unauthorised access.</p>
Destroying or de-identifying data when no longer required	<p>We aim to keep personal information only for as long as we need it – for example for business or legal reasons. When we no longer need information, we take reasonable steps to destroy or de-identify it.</p>

### 8. Accessing, updating and correcting your information

#### Can you see what information we have?

You can ask us for a copy of your information, like your transaction history, by visiting a store, going online or calling us. To get a copy of credit information we have about you, you can visit a store or call us.

For more detailed information, like what we've included in your loan file, please contact our Customer Relations team using the details in **Section 10**.

#### Is there a fee?

No.

#### How long will it take?

We try to make your information available within 30 days after you ask us for it. Before we give you the information, we'll need to confirm your identity.

#### Can we refuse to give you access?

In some cases, we can refuse access or only give you access to certain information. For example, we might not let you see information that is commercially sensitive. If we do this, we'll write to you explaining our decision.

#### Updating your information

It's important that we have your correct details, such as your current home and email addresses and phone number. You can check or update your information at any store, or by going online or calling us (see **Section 10**).

#### Can you correct or update your information?

You can ask us to correct or update any information we have (including credit information). See **Section 10** for ways to contact us. If we've given the information to another party, you can ask us to let them know it's incorrect. We don't charge a fee for this.

If the incorrect information was given to us by a credit reporting body, we may need to check with them or the relevant credit provider before we can change it. We'll try to do this within 30 days. We'll let you know why it's taking longer and agree on a new timeframe with you. We'll also tell you when we've corrected the information.

#### What if we believe the information is correct?

If we don't think the information needs correcting, we'll write to let you know why. You can ask us to include a statement with the information that says you believe it's inaccurate, incomplete, misleading or out of date.

### 9. Making a privacy complaint

#### How can you make a complaint?

We try to get things right the first time - but if we don't we'll do what we can to fix it. If you are concerned about your privacy (including credit information), you can make a complaint and we'll do our best to sort it out.

To make a complaint, contact one of our staff or customer service teams. We'll look into the issue and try to resolve it straight away. If you're not satisfied, you can call our Customer Care team. See **Section 10** for contact details.

#### How do we manage a complaint?

We will:

- › Keep a record of your complaint
- › Give you a reference number, along with a staff member's name and contact details if you want to follow it up
- › Respond to the complaint within a few days if we can, or tell you if we need more time to look into it
- › Keep you updated on what we're doing to fix the problem
- › Give our final response within 45 days (or 90 days for superannuation complaints). If we can't give you a response in this time, we'll get in touch to tell you why and work out a new timeframe with you.

**Credit information complaints**

If your complaint is about your credit information, we may need to check with credit reporting bodies or the credit provider involved.

We'll let you know we've received your complaint within seven days. If we can't sort it out within 30 days, we'll get in touch to tell you why and work out a new timeframe to with you.

**What else can you do?**

If you're not satisfied with how we manage your complaint after you've been through our internal complaints process, there are free and independent dispute resolution services available to you.

The Financial Ombudsman Service can consider most complaints involving financial services providers.

If your complaint is about how we handle your personal information, you can also contact the Office of the Australian Information Commissioner.

<b>Financial Ombudsman Service</b>	<b>Office of the Australian Information Commissioner</b>
GPO Box 3 Melbourne VIC 3001 Phone 1800 367 287 Visit <a href="http://www.fos.org.au">www.fos.org.au</a>	GPO Box 5218 Sydney NSW 2001 Phone 1300 363 992 Visit <a href="http://www.oaic.gov.au">www.oaic.gov.au</a>

**10. We're here to help**

<b>Our website</b>	<a href="http://www.bankwest.com.au">www.bankwest.com.au</a>	
<b>To ask a question, access your information, make a correction, or complaint, or to get a printed version of this policy</b>	<b>Step 1: Talk to us</b>	
	<b>Visit a Store or Business Centre</b>	<a href="http://www.bankwest.com.au/find-us">www.bankwest.com.au/find-us</a>
	<b>Call us</b>	Customer Help Centre <b>13 17 19</b> Business Support Centre <b>13 70 00</b> <b>+61 8 9449 2840</b> from overseas (international charges apply) <b>1800 650 111</b> between 8am – 8pm local time, 7 days a week
	<b>Online</b>	Log into your Internet Banking Service and send us an email via the secure "BankMail" facility located within the message centre.
	<b>National Relay Service</b>	TTY/Voice: <b>13 36 77</b> SSR: <b>1300 555 727</b>
	<b>Step 2: Contact Customer Relations</b>	
	If you're not satisfied, you can contact our Customer Care team.	
	<b>Customer Care</b>	Fax: <b>1300 259 233</b> Complete our online form at <a href="https://secureforms.bankwest.com.au/retail-forms/contact-customer-relations">https://secureforms.bankwest.com.au/retail-forms/contact-customer-relations</a> Write to us: <b>Manager Customer Care</b> <b>GPO Box E237, Perth WA 6001</b>

If you are an EU resident and have an enquiry relating to your rights under the GDPR, complete our online feedback form at <https://www.bankwest.com.au/retail-forms/contact-customer-relations>

# Appendix 1:

## Additional information for European Union citizens residing in the European Union

The European Union (EU) General Data Protection Regulation (GDPR) has harmonised the data privacy laws of each individual EU country, giving more rights to individuals located in the EU and more obligations to organisations holding their personal information. In this Appendix, “personal information” means any information relating to an identified or identifiable natural person (the meaning given to the term “personal data” in the GDPR).

Personal information must be processed in a lawful, fair and transparent manner. As such, if you are located in the EU, GDPR requires us to provide you with more information about how we collect, use, share and store your personal information as well as advising you of your rights as a ‘data subject’.

### What personal information we collect

Please refer to Section 3 of the main Privacy Policy for details of the personal information we collect.

### Special Categories of Personal Information

The GDPR provides additional protection for personal information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric data (for example your fingerprints), or data concerning your health, sex life or sexual orientation. We will only process this type of personal information with your consent or where otherwise lawfully permitted.

### How long we keep your personal information

We will keep your information for as long as you are a customer of the CBA Group. We aim to keep your information for only as long as we need it.

We generally keep your information for up to 7 years after you stop being a customer, but we may keep your information for longer:

- › To fulfill legal or regulatory obligations
- › For internal research and analytics or
- › To respond to a question or complaint

### How we use your information

We can only collect and use your personal information if we have a valid lawful reason to do so. For the Group, these reasons are:

- › **Contract:** We need to process your information in order to fulfil a contract you have with us, or because you have asked us to take specific steps before entering into a contract.
- › **Legal obligations:** We need to process your information for us to comply with the law (not including contractual obligations).
- › **Consent:** You have given clear consent for us to process your personal information for a specific purpose.
- › **Legitimate interests:** We need to process your information for our legitimate interests or the legitimate interests of a third party. This legitimate interest is overridden where there is a good reason to protect your personal information.

Purpose, lawful basis and legitimate interest for processing your personal information		
How we use your information	Our reasons	Our legitimate interests
To confirm your identity	<ul style="list-style-type: none"><li>› To fulfil contracts</li><li>› To meet our legal duty</li><li>› We have legitimate interests</li></ul>	<ul style="list-style-type: none"><li>› Preventing fraud</li><li>› Complying with guidance of regulators</li><li>› Managing risk</li></ul>
To assess your application for a product or service	<ul style="list-style-type: none"><li>› We have your consent</li><li>› To fulfil contracts</li><li>› To meet our legal duty</li><li>› We have legitimate interests</li></ul>	<ul style="list-style-type: none"><li>› Identifying credit risks prior to entering into a loan agreement</li><li>› Complying with guidance of regulators</li><li>› Managing risk</li></ul>
To design, manage, price and provide our products and services	<ul style="list-style-type: none"><li>› To fulfil contracts</li><li>› To meet our legal duty</li><li>› We have legitimate interests</li></ul>	<ul style="list-style-type: none"><li>› Developing new products and services and improving existing products and services.</li></ul>

## Purpose, lawful basis and legitimate interest for processing your personal information

How we use your information	Our reasons	Our legitimate interests
To manage our relationship with you	<ul style="list-style-type: none"> <li>› We have your consent</li> <li>› To fulfil contracts</li> <li>› To meet our legal duty</li> <li>› We have legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>› Preventing and investigating potential criminal activity</li> <li>› Complying with guidance of regulators</li> <li>› Managing risk</li> <li>› Developing new products and services and improving existing products and services.</li> </ul>
To minimise risks and identify or investigate fraud and other illegal activities	<ul style="list-style-type: none"> <li>› To fulfil contracts</li> <li>› To meet our legal duty</li> <li>› We have legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>› Preventing fraud</li> <li>› Ensuring network and information security</li> <li>› Reporting possible criminal acts or threats to public security</li> <li>› Prevention and investigation of potential criminal activity</li> <li>› Complying with guidance of regulators</li> <li>› Managing risk</li> </ul>
To contact you, for example, when we need to tell you something important	<ul style="list-style-type: none"> <li>› We have your consent</li> <li>› To fulfil contracts</li> <li>› To meet our legal duty</li> <li>› We have legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>› Preventing fraud</li> <li>› Complying with the guidance of regulators</li> <li>› Managing risk</li> <li>› Prevention and investigation of potential criminal activity</li> <li>› Developing new products and services and improving existing products and services</li> </ul>
To improve our service to you and your experience with us	<ul style="list-style-type: none"> <li>› We have your consent</li> <li>› To fulfil contracts</li> <li>› To meet our legal duty</li> <li>› We have legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>› Preventing and investigating potential criminal activity</li> <li>› Complying with guidance of regulators</li> <li>› Managing risk</li> <li>› Developing new products and services and improving existing products and services.</li> </ul>
To comply with laws, and assist government or law enforcement agencies	<ul style="list-style-type: none"> <li>› To fulfil contracts</li> <li>› To meet our legal duty</li> <li>› We have legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>› Preventing fraud</li> <li>› Ensuring network and information security</li> <li>› Reporting possible criminal acts or threats to public security</li> <li>› Prevention and investigation of potential criminal activity</li> <li>› Complying with guidance of regulators</li> <li>› Managing risk</li> </ul>
To manage our business	<ul style="list-style-type: none"> <li>› We have your consent</li> <li>› To fulfil contracts</li> <li>› To meet our legal duty</li> <li>› We have legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>› Complying with guidance of regulators</li> <li>› Prevention and investigation of potential criminal activity</li> <li>› Managing risk</li> <li>› Developing new products and services and improving existing products and services.</li> </ul>
Direct Marketing	<ul style="list-style-type: none"> <li>› We have your consent</li> <li>› We have legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>› Direct marketing</li> <li>› Developing new products and services and improving existing products and services</li> </ul>

We may use your information for direct marketing purposes. We will only do this with your consent.



## Your rights as a data subject

The right to be informed how personal information is processed	You have the right to be informed how your personal information is being collected and used. If we require your consent to process your information you can withdraw consent at any time. If you withdraw consent, we may not be able to provide certain products or services to you. The right to withdraw only applies when the lawful basis of processing is consent.
The right of access to personal information	You can access your personal information that we hold by completing our online feedback form at <a href="https://www.bankwest.com.au/retail-forms/contact-customer-relations">https://www.bankwest.com.au/retail-forms/contact-customer-relations</a>
The right to rectification	You have the right to question any information we have about you that is inaccurate or incomplete. If you do, we will take reasonable steps to check the accuracy and correct it.
The right to erasure	You have the right to ask us to delete your personal information if there is no need for us to keep it. The right to erasure is also known as the right to be forgotten. You can make the request verbally or in writing. There may be legal or other reasons why we need to keep your data and if so we will tell you what these are.
The right to restrict processing	You have the right to ask us to restrict our use of your personal information in some circumstances. We may be able to restrict the use of your data. In this situation we would not use or share your information while it is restricted. This is not an absolute right and only applies in certain circumstances.
The right to data portability	In some circumstances you have the right to request we provide you with a copy of the personal information you have provided to us in a format that can be easily reused.
The right to object	In some circumstances you have the right to object to us processing your personal information. In this case we can continue to hold your data but cannot use it.
Rights in relation to automated decision making and profiling	You have rights over automated decisions. You can ask that we do not make our decision based on the automated decisioning alone. You can object to an automated decision and ask that a person reviews it.
The right to lodge a complaint with a supervisory authority	You have the right to complain to the regulator if you are not happy with the outcome of a complaint. See the 'Regulator Contact Details' section for more information. The individual regulator websites will tell you how to report a concern

Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain personal information with us, in which case we may not be able to provide to you some of the features and functionality of the Service.

### Minors and Children's Privacy

We will seek parent or guardian consent to collect the personal information of children under 16.

### Regulator Contact Details

Information Commissioner's Office  
Wycliffe House  
Wilmslow  
Cheshire SK9 5AF  
UK

Visit: [ico.org.uk](http://ico.org.uk)

For other European jurisdictions please refer to the [European Commission website](#) for details of the relevant data protection authorities.