

## **Australian Unity Bank Limited**

# Consumer Data Right Policy

### **Australian Unity Bank**

Australian Unity Bank Limited (ABN 30 087 652 079) is part of the Australian Unity Group. Established in 1840, Australian Unity was Australia's first member-owned wellbeing company, offering our members and customers health, wealth and care services.

In this document, Australian Unity Bank, we or us means Australian Unity Bank Limited.

## **About this policy**

This Consumer Data Right (CDR) Policy explains how we manage your CDR data, how you can access and correct that data, and how you can make a complaint.

This policy only applies to Australian Unity Bank.

We update and approve our policies as required and you are able to find the latest version on our website, and if needed, you can always ask us to send you an electronic or hard copy of the latest version. The Policy is provided to you free of charge.

## **Consumer Data Right (CDR)**

The Consumer Data Right was introduced by the Federal Government to provide you more control over your data and to make it easier for you to access and share that data with accredited third parties. This regime was made possible by amendments made to the Competition and Consumer Act 2010 and the introduction of the Competition and Consumer (Consumer Data Right) Rules 2020 (CDR legislation).

CDR was first implemented in the banking sector and is known as Open Banking.

Under the CDR, the organisation holding your data is called a Data Holder and the organisation receiving your data is called a Data Recipient. Since Data Recipients need to be accredited, they are also referred to as Accredited Data Recipients.

We hold data about you to provide you with our banking products and services. We currently are a Data Holder. We may in the future also be a Data Recipient – when we do, we will be accredited by the Australian Competition & Consumer Commission (ACCC) for this purpose.

#### **CDR** and your privacy

The CDR legislation, the Privacy Act 1988, together with Australian Unity Bank's Privacy Policy, collectively govern how we manage your personal information and CDR data.

## What data will be available and shared under the CDR?

#### **Product Data**

We are required under the CDR legislation to publicly make available our Product Data. This is information about products and services we offer to our customers. This data is generic and without any identifiable customer details. Product Data generally includes information such as: pricing, terms and conditions, eligibility criteria, fees, availability and performance of the product or service offerings.

Any person or organisation can make a request to access our Product Data via our dedicated product API portal. You do not need to be a customer of Australian Unity Bank to make such a request.

#### **Consumer Data**

Consumer Data is information that relates to you as a customer using our product and services. This will include data about the following products and services that you may hold with or obtain from us:

- · Transaction or saving accounts
- Term deposit accounts
- Home loans or personal loans
- Personal or business credit card accounts.

## **Required Consumer Data and Voluntary Consumer Data**

Under the CDR legislation, in addition to Product Data, we're also required to make available specific customer sets of data for sharing, known as Required Consumer Data. The Required Consumer Data that we hold about you and must share with an Accredited Data Recipient – at your request and authorisation – is:

- Customer name (except date of birth), occupation and contact details (and if you're a business, certain identification information about your business)
- Account details such as: account name, number, opening and closing balances, fees and charges
- Transaction information such as: amount debited, credited, date of transaction and description
- Any authorisations on the account including direct debits and scheduled payment details
- · Saved payees stored with the account

These data sets will be made available gradually as the various phases of the Open Banking regime are implemented over time. We'll only share data that we're required to share under the CDR legislation, and we won't share your data unless we have your valid consent to do so.

The sharing of Required Consumer Data is free of charge.

Consumer Data that we are not required to make available (that is, Consumer Data that is not Required Consumer Data) is known as Voluntary Consumer Data. Australian Unity Bank does not currently make available Voluntary Consumer Data. However, once we do, we'll notify you in advance of its availability and of any fee that is applicable for this service.

### **Data sharing**

## Who can request to share data and what accounts are eligible?

In order to be eligible for data sharing, the CDR legislation requires you to:

- be an individual who is at least 18 years old
- hold an open account with us and be registered for online banking services

#### Consent for sharing consumer data

Under the CDR legislation we will only share your CDR data with another organisation if you provide us with the permission to do so (unless required by law). Your CDR data sharing dashboard will provide you with a way to track all the permissions you have given to us to share your information. The CDR allows you to share data for specific purposes and your consent can be given for a specific period (up to 12 months maximum).

Before you provide your consent to an Accredited Data Recipient to collect and use your CDR data, it is important that you:

- understand how the Accredited Data Recipient manages and uses your CDR data they collect
- specify for how long your consent is to be given
- give clear instructions on how they can use your CDR data
- clarify when they have finished using your CDR data, whether you want your CDR data to be deleted or de-identified and when.

**Important:** Only Accredited Data Recipients you authorise can receive data under the CDR legislation. If you want to learn more about accreditation, visit CDR Accreditation Guidelines

### How does data sharing work?

You can choose to share your CDR data with an Accredited Data Recipient as a part of their product or service offering.

You need to authorise the Accredited Data Recipient (via their website or app) to collect your CDR data from us, and then they'll redirect you to Australian Unity Bank's data sharing website. Once on our website, we'll ask you to enter your internet banking User ID and we'll send you a One Time Password (OTP) via SMS. You may then proceed with providing consent for the data sharing once we have verified the OTP.

Important: Please remember, we will never ask you to share your password, and you should never share your Internet Banking credentials with a third party. You should note that under Open Banking, the Accredited Data Recipient you actually authorise, will only be receiving CDR data but cannot access your account.

We'll inform you what CDR data has been requested from us by the Accredited Data Recipient and we'll ask you to choose what you'd like to share with them.

You'll be asked to authorise us to share your Australian Unity Bank CDR data with the Accredited Data Recipient for a period of time.

#### Sharing data from a joint account

By default, a joint account is enabled for data sharing unless an account holder chooses to disable it. When enabled for data sharing, any account holder is able to share data from this account with a specific Accredited Data Recipient without further approval. Any account holder is also able to choose to stop sharing data from the joint account at any time by electing to disable it.

If the account is disabled and you would like to enable it for data sharing, all account holders must agree and approve the request. To enable or disable a joint account for sharing, please do so via the Australian Unity Bank Open Banking Dashboard.

#### Delegating someone to share your data on your behalf

You, as the account holder, can appoint another person as a data sharing delegate for your individual, joint accounts and/ or an entity account. Your data sharing delegate must have an authority to transact on your account, be over 18 years old, and registered for online banking with Australian Unity Bank. Your data sharing delegate will then be able to set up data sharing with Accredited Data Recipients without further approval.

For joint accounts enabled for sharing, any account holder can set up another person as a data sharing delegate without the approval of other account holders. The data sharing delegate can share data for the joint account without further approval from the other account holders. We'll let all account holders know when this happens. Any account holders will also be able to choose to stop sharing data from the joint account at any time.

Any account holder can remove a data sharing delegate from sharing at any time. To remove a data sharing delegate please do so via the Australian Unity Bank Open Banking Dashboard.

#### Changing your mind regarding data sharing

You may withdraw or change your consent for us to share your Consumer Data at any time by using the Australian Unity Bank Open Banking Dashboard. We'll cancel the authority to share data with the Accredited Data Recipient upon receiving your request to do so and notify you through the data sharing dashboard as soon as practicable. Should you request to amend your consent with the Accredited Data Recipient, we'll invite you to update your respective authorisation provided to this Accredited Data Recipient as well.

## Correcting or amending your CDR data

It's important to keep your CDR data current and accurate. Should you find that your data with Australian Unity Bank is incorrect or inaccurate, please request correction by contacting us via phone or in writing. Details on how to contact us are listed on our website as well as below.

We'll acknowledge your request and aim to correct your Consumer Data within 10 business days (if it is found to be erroneous) and inform you in writing once corrected.

If we find that your Consumer Data is accurate, up to date, complete and not misleading, we'll provide you with the explanation as to why we have decided not to correct it. There are no fees for this service.

In addition, we'll let you know the ways for you to escalate the matter if you're unsatisfied with our explanation.

The security of your data and your privacy are very important to us, please refer to our <u>Privacy Policy</u> for further information.

## Making a complaint

If you have any concerns about the way we handled your CDR data, or if you think we have breached any obligations related to the CDR, and you would like to make a complaint, you may do so free of charge by contacting us as follows:

Phone: 1300 790 740

Email: bankingsupport@australianunity.com.au

Mail: Australian Unity Bank Limited Reply Paid 1801, Melbourne VIC 3001

#### What to expect when you lodge a complaint

**Tell us** about your complaint or feedback using your preferred method. To help us help you, please provide us as much information as possible, including:

- your name (and account details if applicable).
- preferred contact details
- what your complaint is about. For instance, what service or product your complaint is about, what went wrong, when, and who you were dealing with (if known), and
- what resolution you are seeking.

We will **acknowledge** your complaint within **1 business day** (or as soon as practicable). This will usually be via the same way you told us about your complaint — unless you've asked us to communicate with you another way and we can reasonably do this.

We will investigate and work to resolve your complaint. Depending on the nature and complexity of your complaint, one of the following will happen next:

#### I. We can resolve your complaint within 5 business days

For your complaint to be considered resolved, this means that you are satisfied with the outcome, or we have provided an explanation (this could be written or verbal), or we have apologised or there is no further action we reasonably believe we can take.

Where we can resolve your complaint in 5 business days, we will only send you a written response if you have specifically requested a written response from us.

#### II. We will provide you a written response

We will provide you with a written response that outlines what we did in response to your complaint, the outcome of your complaint, or any reasons why we rejected or partially rejected your complaint within 30 calendar days from when you told us about your complaint.

#### III. We will inform you of a delay.

If something which is out of our control occurs, or your complaint is very complex, we will let you know before the timeframes noted above if there will be a delay with our response.

If we do this, we will let you know:

- the reason for the delay
- your right to complain to an external dispute body and their contact details, and
- the revised complaint resolution date. By this date (unless advised of another delay) you will be provided a response about your complaint.

To learn more about our complaints process in details, see our full complaints Handling and Dispute Resolution Guide at the Australian Unity feedback page.

#### Still not satisfied with the outcome?

Thank you for giving us the opportunity to resolve your complaint in the first instance.

If you believe that we have not made reasonable attempts to address your complaint, or you are not satisfied with our resolution, you can take your complaint to an independent, external complaint handling body.

The contact details of the external dispute handling bodies you can refer your complaint to are listed below:

I. Australian Financial Complaints Authority (AFCA) (afca.org.au) is an external dispute resolution body which provides fair and independent financial services complaint resolution. It is free to customers.

Phone: 1800 931 678 Email: info@afca.org.au

Mail: Australian Financial Complaints Authority

GPO Box 3, Melbourne VIC 3001

 I. The Office of the Australian Information Commissioner (OAIC) (oaic.gov.au) – For matters related to Privacy complaints.

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Mail: The Office of the Australian
Information Commissioner

GPO Box 5288, Sydney NSW 2001

## We're here to help

If you have a question about this CDR Policy or need help, you may contact us via the details listed below. We'll be happy to help.

1300 790 740 bankingsupport@australianunity.com.au