



XYLO PRIVACY POLICY

OUR PRIVACY COMMITMENT TO YOU



Things you should know:

This policy is current as at 15th August 2007. From time to time, we may make changes to our policy or policies, processes and systems in relation to how we handle your personal information. We will update this policy to reflect any changes.

Westpac Banking Corporation ABN 33 007 457 141
Australian Financial Services Licence Number: 233714





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OUR PRIVACY COMMITMENT TO YOU

When you trust XYLO with your personal and financial information, we know you expect us to protect it and keep it safe.

We won't let you down.

This means that when we receive your personal and financial information we :

- > tell you how we may use it
- > keep it in a secure way
- > make sure it is kept accurate and up to date
- > restrict how we use it
- > restrict who we provide it to.

This document briefly explains the main ways we protect your privacy and how we comply with the National Privacy Principles. It also describes the types of personal information we may collect from you. You can get more detailed information on these matters by contacting us, or by reading the privacy notices we give you when you apply for one of our products or services.

When this document refers to **we** or **us** we mean XYLO, a division of Westpac Banking Corporation. This document reflects the content of the Westpac Privacy Policy, save for changes necessary to more accurately reflect the relationship that you have with us. When we talk about **Westpac Group** we mean the Westpac Banking Corporation and its related companies, which includes the BT Financial Group Companies.

HOW TO CONTACT US

You can contact us about this policy or our products and services by:

Calling **1300 XYLO FX (1300 9956 39)**

Emailing **customercare@XYLO.com.au**

If practical, you can contact us without identifying yourself. However, if you don't identify yourself, we may not be able to give you the information and services you would otherwise receive.

WHAT SORT OF PERSONAL INFORMATION DO WE ASK FOR?

We will only ask for personal information relevant to our business relationship with you. So, when you apply for one of our products or services we may ask for:

- > Information that identifies you, like:
 - your name, address and other contact details
 - your date of birth
- > Information about your financial position when you want a loan product, like:
 - your financial details, including income, expenses, savings and lending history
 - credit reports from credit reporting agencies
 - opinions from other banks about your creditworthiness
 - your employment details
- > your tax file number
- > information about your use of our product or service.

When we conduct market research, we may also ask for your opinion about products, services or staff. We treat these opinions as personal information.

The Privacy Act places restrictions on collecting sensitive information about you (this includes information about your religious views, ethnicity, political opinions, criminal records, personal health information or sexual preferences). Generally, we won't collect this sort of information. However, we may collect some sensitive information if:

- › we need to provide you with a specific product or service (for example certain insurance products)

or

- › you are applying for a job with us

and you have provided your consent for us to do so.

WHY DO WE ASK FOR PERSONAL INFORMATION?

We will tell you the main reason for asking for your personal information when we seek it from you.

The main reason will usually be to provide you with a product or service you want. We may use the information to:

- › check whether you are eligible for the product or service
- › provide you with the product or service
- › help manage the product or service, for instance:
 - when you make a query about it
 - when we want to contact you about changes to it.

We may use personal information for other reasons including:

- › telling you about products or services that we think may interest you (unless you tell us not to

– which you can do at any time)

- › preventing fraud and other criminal activity in relation to your account
- › helping us to run our business. This will include using information for:
 - training our staff
 - accounting, risk management, record keeping, archiving, systems development and testing
 - developing new products and services
 - undertaking planning, research and statistical analysis.

We may also ask for your personal information because we are required to collect it for legal reasons. For example, legislation such as the Financial Transaction Reports Act may require us to ask you for information to check your identity (e.g. by referring to your driver's licence, birth certificate or passport).

If you don't provide some personal information, we may not be able to provide you with the product or service you want.

HOW DO WE COLLECT PERSONAL INFORMATION?

If it's reasonable and practical to do so, we collect personal information directly from you. We may do this through application forms, over the telephone, the internet, or in person when you visit our branches and instores (these are retailers that provide basic banking services on our behalf).

We may also need to collect personal information from other people. Sometimes this may happen without your direct involvement. Some examples of the people or organisations from which we may collect personal information about you are:



- › other credit providers
- › publicly available sources of information (such as telephone directories)
- › market research organisations (such as shopper's surveys and telephone polls)
- › your representative (such as a legal adviser)
- › third-party brokers (such as insurance brokers and mortgage brokers)
- › credit reporting agencies
- › government agencies (such as the Land Titles Office).

So that we may better tailor our information and products to your needs, we use technology known as "cookies" to collect statistical information on website activity, such as the number of people using our website and how they navigate through it. You can find more information about this technology by visiting our website (www.xylo.com.au) and locating our Internet Privacy policy.

So that we can better tailor information and products to your needs, when we send you email messages, we may use technology to identify you so that we can know when you have opened the email or clicked on a particular link in the email.

If you log into XYLO, we will collect information from you to confirm your identity.

When you ring us, we may also monitor and/or record telephone calls for the purposes of staff training and to verify statements made during the phone call.

DO WE PROVIDE YOUR PERSONAL INFORMATION TO OTHERS?

We may share your personal information with other organisations in the Westpac Group.

Sometimes we provide personal information about our customers to organisations outside the Westpac Group. Generally, these organisations that help us with our business. These may include.:

- › outsourced service providers such as mailing houses and telemarketing agencies
- › authorised representatives of the Westpac group who sell products or provide services on our behalf
- › insurers and re-insurers
- › superannuation funds
- › payment systems operators (for example, merchants receiving credit card payments and rewards program managers)
- › other financial institutions (for example, when you want to borrow from another bank)
- › organisations involved in what are called securitisation arrangements, under which we sell, for instance, a pool of customer's loans. These organisations include..
 - trustees of those arrangements, investors and their advisers
 - credit reporting agencies
 - lenders' mortgage insurers
 - debt collecting agencies
 - our accountants, auditors or lawyers
 - your representative (for example, lawyer, mortgage broker, financial adviser, executor, administrator, trustee or attorney).



We strive to limit the information we give these organisations to what they need to perform their services for us or provide products or services to you. We also enter into contracts with organisations who provide services to us or who provide products or services jointly with us. These contracts require the organisation to:

- › Meet the privacy standards we set for ourselves in protecting your personal information and comply with the Privacy Act
- › Use the personal information only for the specific service we ask them to perform or the product/service that we ask them to provide, and for no other purpose.

We may also need to provide your personal information to others outside the Westpac Group where:

- › We are (in limited circumstances) allowed or required to by law or where we have a public duty to do so. For example, a Court, a regulator (such as ASIC or the ATO) or the police can compel us to disclose personal information to them. The Code of Banking Practice may also require us to provide specific information about you to a prospective guarantor when you want to take out a loan, or
- › You have expressly consented to your personal information being supplied to others. Usually we ask you to consent in writing (such as in our privacy consents). In special circumstances, you can consent by speaking to us, or
- › it can be reasonably inferred from the circumstances that you consent to your personal information being disclosed to them (implied consent). For example, your consent will be implied for us to use and disclose your information to inform you of products and

services that we believe may interest you. However, your implied consent for us to do this can be withdrawn at any time by telling us.

We may sometimes have to transfer your personal information overseas. We will only do this in accordance with the Australian National Privacy Principles.

DO WE USE PERSONAL INFORMATION TO MARKET PRODUCTS AND SERVICES TO YOU?

We may use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to.

We also won't sell your personal information to organisations outside the Westpac Group. We do sell your personal information to other organisations inside the Westpac Group so they can market their services and products to you.

If you don't want to receive marketing offers, please tell us. You can tell us any time by:

- › calling **1300 XYLO FX (1300 9956 39)**, or by
- › writing to us at **XYLO Financial GPO Box 5198 Sydney NSW 2001** or by
- › sending an email to **customer@XYLO.com.au**

We will act promptly on your request. We will also ensure each electronic message we send (e.g. by email, SMS, MMS or iM) includes a method that enables you to tell us you do not want to receive future electronic marketing material.

CAN YOU ACCESS YOUR PERSONAL INFORMATION?



Yes.

You can also ask for any corrections to be made.

You can request access to your personal information by contacting us by telephone on **1300 XYLO FX (1300 9956 39)**. This service is free unless the personal information you request requires research or preparation time. Before we act on your requests, we will give you an estimate of how much this service will cost and ask you to agree before proceeding.

We may not always be able to give you access to all the personal information we have about you. For instance, we may not be able to give you access to information that :

- › would reveal personal information about another person
- › would reveal a commercially sensitive decision-making process
- › we are prevented by law from providing to you
- › relates to existing or anticipated legal proceedings.

DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?

Yes.

We maintain the quality of your personal information by taking reasonable steps to make sure that the information collected, used and disclosed is accurate, complete and up-to-date. We encourage you to help us by telling us immediately if you change your contact details (such as phone number or address).

IS YOUR PERSONAL INFORMATION SECURE?

Yes.

We will use up-to-date techniques and processes, which meet current industry standards, to protect your personal information from misuse, loss and unauthorised access, modification or disclosure.

The only people who are allowed to handle or have access to your personal information are those employees of the Westpac group and those who perform services for us who need your personal information to do their jobs. All Westpac employees are bound by both the Westpac Code of Conduct and by confidentiality clauses in their employment agreements to not misuse your personal information. Those who perform services on our behalf are also bound by privacy and confidentiality agreements.

Paper documents are protected from unauthorised access or use through various security systems that we have over our physical premises. We also maintain up to date computer and network security systems with appropriate firewalls, encryption technology and passwords to protect electronic copies of personal information.



We also require you to help us by complying with the security measures designed to protect your personal identification numbers and passwords. These are set out in terms and conditions of your account. You may be able to limit your liability for unauthorised use of your account if you observe these requirements.

If we no longer require your personal information, we will take steps to destroy it in a secure manner or remove identifying features from it. This is subject to any legal obligations we have to keep information for a certain period of time.

When you meet with us to discuss your finances and we ask for personal information from you, we will make every effort to minimise the opportunities for other people to overhear the conversation.

IS XYLO SECURE?

The security of XYLO will depend on both your actions and ours. When you use XYLO, we require you to take specific measures to protect against unauthorised access. These measures form part of the terms and conditions for using XYLO. They include but are not limited to:

- › Changing the password part of your access code on initial access to XYLO
- › Ensuring access codes and tokens given to you and your authorised users are secure
- › Destroying any documentation we issue containing your access codes
- › Trying to memorise your access codes
- › Not telling anyone of your access codes
- › Not keeping your computer and undisguised access codes together
- › Immediately telling us by telephoning **1300**

XYLO FX (1300 9956 39) or **+61 2 1300 9956 39** from overseas if you suspect the security of your access codes has been breached.

A full list of the security measures we require from you are set out in the XYLO Product Disclosure Statement.

- › We use up-to-date and secure technology methods to protect your personal information when you use Internet banking.
- › When we capture your personal information, it passes through our secure server using encryption technology that scrambles the personal information. This protects against unauthorised access to your information over the internet.
- › Stored personal information about you is further protected from unauthorised access through the use of multiple firewalls, secure passwords and sign-in processes.
- › We can't guarantee the policies and procedures of any other websites that may be linked from our website. They may or may not meet the same privacy standards we set for ourselves. So, you should take care to understand and evaluate their particular privacy standards and procedures, as needed.

For more information about how your privacy is protected when you visit our website, visit our website at **www.XYLO.com.au** and locate our Internet Privacy policy.



WHAT IF WE DON'T KEEP OUR PROMISES?

Although we are committed to keeping promises set out in this document, we sometimes make mistakes. Fixing these mistakes and ensuring we deliver on our promises is very important to us.

We've put in place a way of dealing with issues you might raise quickly and fairly.

Please talk to us first.

We aim to resolve your complaint at your first point of contact with us.

You can contact us from anywhere in Australia, between 7:00am to 6:00pm AEST Monday to Friday

Telephone: **1300 XYLO FX(9956 39)**

Email: **customercare@XYLO.com.au**

Fax: **1300 995 640**

Mail: **GPO Box 5198, Sydney NSW 2001**

Contact the Westpac National Customer Relations Unit

If we can't resolve your complaint at your first point of contact with us, we will escalate it to the Westpac National Customer Relations Unit.

The Customer Advocate's role is to act as independently as possible to make sure that Westpac has treated you fairly.

You can contact the Westpac National Customer Relations Unit on:

Telephone: 1300 130 206

Fax: (02) 9220 4177

Email: Go to the website www.westpac.com.au and click on 'Contact Us' and then click on 'Complaints and Compliments'.

Mail: NCRU, GPO Box 5265, Sydney NSW 2001



**IF YOU ARE STILL UNHAPPY,
THERE ARE OTHER BODIES
YOU CAN GO TO**

Contact the Westpac Customer Advocate

If you feel we did not act fairly in the way we handled your complaint or in the way we resolved your complaint, you can ask the customer Advocate to review the matter for you.

The Customer Advocate's role is to act as independently as possible to make sure that Westpac has treated you fairly.

You can contact our Customer Advocate on :

Telephone: 1300 301 977

Mail: Customer Advocate, GPO Box 5265, Sydney NSW 2001

If you are still unhappy, there are other bodies you can go to.

If we haven't been able to deal with your issues to your satisfaction, there are a number of different bodies you can go to.

The Banking and Financial Services

Ombudsman (BFSO) can consider most privacy complaints involving banks and the products and services they provide. The Ombudsman may elect to forward the complaint to another, similar, dispute resolution scheme if they believe the complaint would be better assessed by such a scheme.

The BFSO can be contacted at:

Mail: GPO Box 3, Melbourne, Victoria 3001

Telephone: 1300 780 808

Fax: (03) 9613 7345

Internet: www.bfso.org.au

The Office of the Federal Privacy

Commissioner. The Commissioner can be contacted on the privacy hotline:

Telephone: 1300 363 992.

 **CONTACT US**

- › Call XYLO Customer Care on 1300 XYLOFX
(1300 995639)
- › Fax us on 1300 995640
- › Email customercare@XYLO.com.au