

PRIVACY POLICY

The SUNCORP brand and Sun Logo are used by Suncorp Bank (Norfina Limited) under licence. Suncorp Bank (Norfina Limited) is not part of the Suncorp Group.

Suncorp Bank and its subsidiaries

Suncorp Bank is the name we use to describe Norfina Limited (ABN 66 010 831 722). Suncorp Bank's subsidiaries are:

- Suncorp Equipment Finance (Norfina Advances Corporation Pty Ltd (ABN 89 100 845 127))
- SME Management Pty Limited (ABN 21 084 490 166)

Suncorp Bank and its subsidiaries (“**we**”, “**us**”, “**our**”) offer a range of banking and financial products and services in Australia. We collect, hold, use and disclose your personal information in a number of different ways.

Suncorp Bank and its subsidiaries were recently acquired by Australia and New Zealand Banking Group Limited (**ANZ**). Suncorp Bank is no longer owned by Suncorp Group Limited and is no longer part of the group of companies owned by Suncorp Group Limited (**Suncorp Group**).

Suncorp Bank will operate as a separate bank to ANZ. Some business support functions and other services may be performed by ANZ and its related entities (“**ANZ Group**”) for Suncorp Bank. This Privacy Policy applies to the activities of Suncorp Bank and its subsidiaries. [ANZ's Privacy Policy](#) applies to the activities of the ANZ Group (other than Suncorp Bank and its subsidiaries), including in relation to the ANZ Group's handling of personal information received under this Privacy Policy.

We are committed to ensuring that your personal information is protected.

Our Privacy Policy

Our Privacy Policy provides you with general information about how we manage your personal information as required by relevant privacy laws. When you purchase or acquire a product or service from us you will receive further information about our privacy practices in a privacy statement or other form of privacy disclosure (“**Privacy Statement**”). The Privacy Statement will give you specific information about how we will manage the personal information for the particular product or service.

Depending on how you interact with us, a Privacy Statement will be delivered to you in a number of ways, including hard copy/paper or via electronic means.

We also have [Online Terms](#) which apply to your use of our websites and other online interactions, as well as specific terms which apply to your use of [Internet Banking](#), the [Suncorp Bank App](#) and the [Suncorp Bank Secured App](#). Please refer to those terms prior to using the services our websites offer, or when you are directed to do so (such as during the acquisition of a product or service). These specific terms may contain additional provisions regarding how we (or third party services with which you interact) handle your personal information.

The type of personal information we collect and hold

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. It includes sensitive information. We will collect a range of personal information which is reasonably necessary for our functions or activities. The type of personal information we collect will depend on the type of product or service you choose.

We will generally collect the following types of personal information:

- name, address and contact details;
- date of birth; and/or
- gender.

Depending on the product or service you choose, we may also collect other types of personal information such as:

- financial/credit/bankruptcy/insurance history and information;
- employment status, history and information;
- marital status/family details or circumstance;
- citizenship or residency status;
- pastime information (e.g. information about your spending habits);
- identity information and government related identifiers (e.g. your tax file number, driver's licence and/or passport details);
- digital information (e.g. location information and/or information about the devices you use to access and interact with our services);
- information about how you use our products and services (e.g. transactions you make on your account); and/or
- any other personal information which is either required to acquire a product or service or needed during the lifecycle of that product or service.

We may also collect sensitive information such as information or opinion about your:

- health;
- racial or ethnic origin;
- sexual orientation or practices;
- membership of a political, professional or trade association (or union);
- religious beliefs or affiliations; and/or
- criminal history.

If we are not able to collect personal information about you we may not be able to provide you with the products, services or assistance you require.

Ways we collect your personal information

We collect your personal information:

- directly from you;

- by using written forms;
 - through contact over the telephone, mobile or other messaging technology;
 - via the internet or from your browser or device, including via our websites, social media pages and our mobile applications; and/or
 - in person to person contact (e.g. meetings or providing products and services through branches, agencies, offices or business centres).
- from publicly available sources of information (e.g. public registers maintained by land registries or ASIC); and/or
- from other persons or organisations (including our related entities and third parties) (e.g. credit reporting bodies, other credit providers, service providers and partners and/or brokers and other parties who may have introduced you to us).

We will collect your personal information during the course of us providing our products and services to you, on an adhoc or a recurrent basis using the above methods. For example, we will collect personal information when you acquire a product or service from us, when you make changes to that product, when you exercise a right under the product or service or when you need to complain. We will combine or link personal information we already know about you to other personal information we collect about you, including between our related entities (as described in the *“Sharing of personal information with our related entities”* section below).

Please refer to *“Parties to whom we disclose and collect your personal information”* section which details the types of organisations we disclose your personal information to and collect your personal information from.

Collection, use and disclosure of Personal Information

Collection of personal information

We collect your personal information so we can:

- identify you and conduct appropriate checks;
- understand your requirements and provide you with a product or service;
- set up, administer and manage our products and services, including obtaining loan assessments and credit reports;
- use, hold and disclose your information to service, maintain and administer accounts (for example, the updating of customer contact information);
- manage, train and develop our employees and representatives;
- communicate with you, manage complaints and disputes, and report to dispute resolution bodies;
- identify, prevent or investigate any potential fraud, unauthorised use or criminal activity and/or protect our legitimate interests;
- get a better understanding of you, your needs, your behaviours and how you interact with us, so we can engage in product and service research, development and business strategy (including managing the delivery of our services and products via the ways we communicate with you);
- conduct and perform recruitment activities, administrative and operational tasks and other business processes (e.g. corporate governance, risk management).
- conduct and perform marketing and promotional activities, including telling you about products or services that may be of interest to you, informing you of special events or offers, or running competitions, promotions, events and programs;
- for the purposes of providing products and services to other customers (but we will not disclose your personal information to any other customer without your consent).

We may also collect your personal information for any additional purpose which we inform you about or which you have agreed to. Sometimes we are required to collect your personal information to satisfy specific legal obligations (e.g. anti-money laundering or counter-terrorism laws, conveyancing laws and/or order of a court or tribunal). The Privacy Statement you receive will give you further details as to which laws may apply to your personal information.

Your Privacy Statement may also contain different primary purposes of collection depending on the product or service you acquire from us, the interaction you have with us, and whether you do business with Suncorp Bank or one of its subsidiaries.

Use and disclosure

We use and disclose your personal information for the purposes we collected it. Please refer to “*Collection of personal information*” section to understand what these purposes may be.

We will use and disclose your personal information for a secondary purpose related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose or where another exception applies under the Privacy Act. In the case of sensitive information, any secondary use or disclosure will be directly related to the purpose of collection. For example, we will disclose your personal information to ANZ Group and third party service providers (including Suncorp Group) so that they can provide the contracted services to Suncorp Bank and its subsidiaries. These contracted services might include support with business processes, information technology support or programming, hosting services, telephony services, security or fraud detection services, mailing or sending of documentation to customers digitally or

otherwise.

There will be other instances when we may use and disclose your personal information including where:

- you have expressly or impliedly consented to the use or disclosure;
- we reasonably believe that the use or disclosure is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body; or
- we are required or authorised by law to disclose your personal information, for example, to a court in response to a subpoena, or to the Australian Taxation Office, Centrelink, and the Australian Transaction Reports and Analysis Centre (AUSTRAC).

Sharing of personal information with our related entities

Suncorp Bank and each of its subsidiaries will share your information between them. If one of us collects your personal information, Suncorp Bank and any of its subsidiaries may use and disclose your personal information for the purposes described in the “*Collection, use and disclosure of personal information*” section in relation to any products and services we may provide to you.

We may also share your personal information with our related entities within the ANZ Group. Those related entities may use and disclose your personal information for the purposes described in the “*Collection, use and disclosure of personal information*” section, including in the course of providing us with services to support products and services we provide to you and to help us operate our business.

Sharing of personal information with companies in the Suncorp Group

Suncorp Bank is no longer part of the Suncorp Group. If you are also a customer of any companies within the Suncorp Group, your Suncorp Bank customer profile will be separate to your Suncorp Group customer profile. This means you will need to notify Suncorp Bank and Suncorp Group separately if you need to access or update your information (including any marketing consents). [Suncorp Group's Privacy Policy](#) will apply to any products and services you receive as a customer of the Suncorp Group.

Suncorp Bank has contracted Suncorp Group to provide certain back-office services to Suncorp Bank and its related entities on a transitional basis while it integrates into the ANZ Group. Some entities within the Suncorp Group may use or disclose your personal information for the purposes described in the “*Collection, use and disclosure of personal information*” section [in the course of](#) providing those back-office services to us.

Collection, use and disclosure of personal information for marketing

We want to collect, use and disclose your personal information to keep you up to date with the range of products and services available from Suncorp Bank and its subsidiaries which we think may be of interest to you. We use a wide variety of marketing strategies including mail, SMS, telephone and other internet based marketing (including targeted online advertising and online behavioural marketing). Third party marketing service providers may combine the personal information we disclose to them with information they already hold about you, in order to serve you with more relevant advertising about our products and services.

Refer to your relevant Privacy Statement or privacy disclosure as to how Suncorp Bank and its subsidiaries will deal with your personal information for the purpose of marketing. We want you to be able to exercise your marketing preferences. Details of how to exercise your preferences will be set out in those statements and via our customer and non-customer contact points.

Using Internet Banking & the Suncorp Bank App

We engage third party service providers to support the internet banking platform on our website and our mobile phone application (**Suncorp Bank App**). Those third parties may also collect your personal information, including biometric and behavioral biometric information with your consent (unless an exception under the Privacy Act applies). (For example, your facial image may be used to enable you to access our products or services and information about how you interact with your device may be used to help protect against potential cases of fraud, unauthorised use and criminal activity). Suncorp Bank and our service providers may use your personal information to:

- secure access to your accounts, your internet banking profile or you Suncorp Bank App profile;
- identify you and conduct appropriate checks;
- identify, prevent or investigate any potential fraud, unauthorised use or criminal activity and protect our legitimate interests;

- understand your requirements and provide you with Suncorp Bank App features and functionality;
- set up, administer and manage products and services facilitated or offered through the Suncorp Bank App;
- manage complaints and disputes, and report to dispute resolution bodies; and
- get a better understanding of you, your needs, your behaviours and how you interact with us. We do this to enable us to develop and modify products and services and develop business strategies to improve delivery of our products and services and the way in which we communicate with you.

We have detection capabilities and a dedicated financial crimes team who use advanced forms of technology to help protect your personal information and provide a safe banking environment for you. When you use the Suncorp Bank App, we may collect, use, and disclose the information about the applications installed on your device, your device settings, and how you access and interact with the Suncorp Bank App, to help detect and prevent potential cases of fraud, unauthorised use, and criminal activity.

Overseas disclosure

We will send your personal information overseas and collect personal information from overseas. Instances when we will do this include:

- when you have asked us to do so or we have your consent;
- when we are authorised or required by law or a court/tribunal to do so;
- when we have outsourced a business activity or function to an overseas service provider; and
- certain electronic transactions.

Your personal information may be transferred to other countries, which may not have similar privacy or data protection laws, and may in certain circumstances compel the disclosure of personal information to a third party such as an overseas authority for the purpose of complying with foreign law or regulatory requirements.

We will disclose personal information overseas but only to the extent it is reasonably necessary to perform our functions or activities. In order to engage in our business activities and functions we will disclose your personal information to and collect your personal information from people and organisations (**'parties'**) in a number of countries. Please click [here](#) to see a list of countries in which those parties are likely to be located. We will need to from time to time disclose your personal information to and collect your personal information from other countries not on this list. This will be on an adhoc or case-by-case basis and for the purposes for which we collected your personal information.

Parties to whom we disclose and collect your personal information

As detailed in the "*Ways we collect your personal information*" section there are a range of parties to whom we disclose your personal information and collect personal information from – that are not you. These may be parties related to Suncorp Bank and its subsidiaries, or third parties. The particular party will depend on the company you do business with and what product or service you receive.

Some examples of the parties to whom we may disclose your personal information to and collect personal information from are:

- subsidiaries of Suncorp Bank, our related entities within ANZ Group, and other trading divisions or departments within the same company;
- companies in the Suncorp Group (as described above in "*Sharing of personal information with companies in the Suncorp Group*");
- customer, product, business or strategic research and development organisations;

- a third party with whom we have contracted to provide financial services/product, administrative or other business services – for example:
 - information technology providers;
 - administration or business management services, consultancy firms, auditors and business management consultants;
 - marketing agencies and other marketing service providers;
 - claims management service providers;
 - print/mail/digital service providers; and
 - imaging and document management services
- data warehouses, strategic learning organisations, data partners, analytic consultants;
- social media and other virtual communities and networks where people create, share or exchange information;
- publicly available sources of information;
- clubs, associations, member loyalty or rewards program providers and other industry relevant organisations;
- any intermediaries, including your agent, adviser, a broker, a representative or person acting on your behalf, other Australian Financial Services Licensees or our authorised representatives, advisers and our agents;
- accounting or finance professionals and advisers;
- an employer, trustee or custodian associated with membership of a superannuation fund, investment/managed fund or life insurance policy;
- government, statutory or regulatory bodies and enforcement bodies;
- people who are authorised or noted on your products with us as having a legal interest;
- in the case of a relationship with a corporate partner such as a bank or a credit union, the corporate partner and any new incoming insurer;
- the Australian Financial Complaints Authority or any other external dispute resolution body;
- credit reporting agencies (as further detailed in our Privacy Statements);
- legal and any other professional advisers or consultants;
- debt collection agencies, your guarantors, organisations involved in valuing, surveying or registering a security property, or which otherwise have an interest in such property, purchasers of debt portfolios;

- NPP Australia Limited, the operator of the Pay ID service, to enable you to receive payments using the PayID service;
- other financial institutions, BPAY® Pty Ltd and their service providers, to allow the PayID service to operate; and
- any other organisation or person where you have authorised them to provide your personal information to us or authorised us to obtain personal information from them (e.g. your partner, spouse, parent or guardian).

Security of your personal information

We may hold your personal information in:

- computer systems;
- electronic databases;
- cloud environments;
- digital records;
- telephone recordings; and
- in hard copy or paper files.

These storage mechanisms may be managed in a number of ways. They may be managed or administered internally by Suncorp Bank, a subsidiary or related entities within ANZ Group, or a third party provider with whom Suncorp Bank or a subsidiary has a contractual relationship and be either managed locally and/or overseas.

We have an obligation to take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. Reasonable steps that we take to secure your personal information include:

- limiting physical access to our premises;
- restricting electronic and physical access to personal information we hold;
- having in place stand-by systems and information backups to deal with major business interruptions;
- maintaining technology security products;
- requiring any third party providers to have acceptable security measures to keep your personal information secure; and
- destroying or de-identifying personal information pursuant to the law and our record retention policies.

E-mail transmissions to Suncorp Bank and its subsidiaries are not necessarily secure. If you have any concern about the security of the contents of your e-mail or any other transaction over the internet, then you should consider contacting us by other means.

Cookies

Our websites rely on "cookies" to provide a number of services to you. A cookie is a small text file placed on your computer by our web server. A cookie can later be retrieved by our website servers. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. Cookies do not alter the operation of your computer or mobile device in any way.

Cookies generally allow our websites you are browsing to interact more efficiently with your device. Suncorp Bank and its subsidiaries use cookies to collect and use information for a range of purposes, including; to maintain and improve

the operation of our website; track user preferences and product requirements to customise our websites and target and improve advertising relevance. We may also have an arrangement with third parties who may use our cookies to improve the relevance of our advertising to you on third party websites. Please see our [Online Terms](#) found on our websites for more information. You can also refer to our [Cookie & Data Policy](#) found on the Suncorp Bank Website.

Non-customers

You may not be a customer of ours but you may be a spouse or family member of a customer. You may also interact with one of our companies by using our transactional websites, entering a competition or commenting via social media.

We will collect, use and disclose your personal information in accordance with this Privacy Policy and any Privacy Statement you may receive when you interact with us. Please see our [Online Terms](#) found on all our transactional websites for more information about interacting with us via the Internet.

Anonymity and pseudonymity

The Australian privacy regime provides the option of not identifying yourself, or of using a pseudonym unless we are required or authorised by law or a court/tribunal to identify you, or it is impracticable to deal with you anonymously or by a pseudonym.

Access and correction of personal information

You have the right to request access to, and correct, the personal information we hold about you. Privacy laws provide for specified circumstances where access may be refused. We will provide reasons for any refusal in writing.

If you would like to request access to or correction of the personal information we hold about you please contact us by using the relevant Access or Correction contact in our Privacy Contact Information table, which can be found below, as we may be able to provide you this information within our normal business processes.

Access or Correction	Complaints	Customer Relations
Position title: Customer Value Specialist Ph: 13 11 75 Email: privacyaccessrequests@suncorpbank.com.au	Ph: 1800 689 792 (free call) Email: CEOoffice@suncorpbank.com.au Postal: Reply Paid 1453 Suncorp Bank CEO Office 4RE058 GPO Box 1453 Brisbane QLD 4001	Ph: 1800 689 792 (free call) Email: CEOoffice@suncorpbank.com.au Postal: Reply Paid 1453 Suncorp Bank CEO Office 4RE058 GPO Box 1453 Brisbane QLD 4001

If not, the staff member will be able to commence the privacy access request process for you which may require you to complete a privacy access request form. These requests may incur a fee and you will be advised of an estimated fee and the payment options at the time of written acknowledgement. This is usually provided to you within 5 business days.

Our response to your request will usually be completed within 30 days of receipt of the request. If we require further time we will contact you in writing to advise of this and provide our reasons for the further time that is required.

We rely on the accuracy of the personal information we hold about you to provide our products and services to you. You have the right to request us to correct any inaccurate, out-of-date, incomplete, irrelevant or misleading personal

information. We will take such steps that are reasonable in the circumstances with regard to the purpose for which your personal information is held to make a correction. We may refuse to correct your personal information and will provide reasons for refusal in writing. If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take such steps that are reasonable in the circumstances to associate that statement with all records containing the relevant information. You can contact us to request the correction to the personal information we hold about you by using the relevant Access or Correction contact in our Privacy Contact Information table which can be found above.

Complaints handling

If you have a complaint about how we collect, hold, use or disclose your personal information or a privacy related issue such as refusal to provide access or correction, please use our complaints process so that we can help. It is important to follow the complaint handling process in order to resolve your complaint effectively and efficiently.

Let us know







The simplest way to raise an issue related to your privacy is by contacting us. First, we'll acknowledge your complaint and explain how we'll work with you to resolve it, at this point we may refer your complaint directly to our Customer Relations Team. Whilst we're usually able to resolve complaints on the spot or within 5 business days, we'll let you know if we need more time. You can contact us by using the relevant Complaints contact in our Privacy Contact Information table which can be found above.

Customer Relations Team

If we aren't able to resolve your complaint or you'd prefer not to contact the people who provided your initial service, our Customer Relations team can assist. We will keep you informed of the progress and provide you with an outcome within 30 calendar days from when we first received your complaint. You can contact the Customer Relations Team by using the relevant contact in our Privacy Contact Information table which can be found above.

Seek review by an external service

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied you can request a review by the Australian Financial Complaints Authority or refer your complaint to the Office of the Australian Information Commissioner as follows:

Office of the Australian Information Commissioner (OAIC)	Australian Financial Complaints Authority (AFCA)
Complaints must be made in writing	AFCA has authority to hear certain disputes. Contact AFCA to confirm if they can assist you.
 1300 363 992	 1800 931 678
 Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001	 Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
 enquiries@oaic.gov.au www.oaic.gov.au	 info@afca.org.au www.afca.org.au

Changes and getting a copy of the Policy

We encourage you to review and check our websites regularly for any updates to this Privacy Policy. We will publish the updated version on this website and by continuing to deal with us, you accept this Privacy Policy as it applies from time to time. If you would like a copy of this Privacy Policy, please contact us.