



**Elders Rural Bank Limited**

ABN 74 083 938 416

## **Privacy Statement**

### **1.0 Introduction**

Elders name has a unique position of trust in the Australian rural sector. This trust has been earned since 1839 and is the basis of the brand's continuing success. Retaining it requires business to be conducted ethically and in line with customers' expectations.

Elders Rural Bank Limited ("Bank", "us", "we", "our") is committed to safeguarding your privacy by ensuring your personal information is protected in a way that observes our own corporate values, as well as complying with the requirements of the National Privacy Principles of the Privacy Act (Cth)(1988), as amended ("Act").

This statement sets out our procedures for safeguarding your privacy.

### **2.0 Scope of Statement**

In addition to its own accounts and services the Bank undertakes management of loan and trade debtor accounts on behalf of Elders Limited, Primac Elders Limited and other Elders Group companies ("Elders Group"). This statement applies to information collected for accounts and services conducted with or managed by the Bank.

Most organisations in Australia must comply with the National Privacy Principles of the Act. The objective of the Act is to set a standard for protecting the privacy of all individuals. The National Privacy Principles and the requirements of them are explained in the detailed section of this statement, below.

#### **2.1 Privacy and the Bank's Corporate Relationship**

Elders Rural Bank Limited is a company owned by Bendigo and Adelaide Bank Limited and Futuris Corporation Limited (parent company of the Elders Group).

The Bank contracts many of its functions to both the Elders Group and Bendigo Bank including marketing services, computer system and network support and as product sales agents for the Bank.

The Bank offers deposit and loan products primarily through branches of the Elders Group acting as agent for the Bank. The Bank also undertakes management of loan and trade debtor accounts on behalf of Elders Limited, Primac Elders Limited and other Elders Group companies.

### **3.0 Definitions**

#### **3.1 Personal Information**

Your personal information includes details such as name, address, date of birth, contact details (such as phone and fax numbers, e-mail addresses).

## **3.2 Sensitive Information**

Sensitive information is a subset of personal information and by its "sensitive" nature may have the potential to be used and / or disclosed to discriminate against someone. Therefore strict information handling requirements exist.

Examples of sensitive information include but are not limited to personal information or opinions on your health, criminal records, sexual preferences, religion etc. Sensitive information can only be recorded if it is relevant to do so and with your consent. Generally, sensitive information is not considered relevant to the provision of most deposit and investment style accounts and financial services.

### **3.1.1 Collection of Personal Information (National Privacy Principle 1)**

Where you have requested a financial product or service the Bank collects your personal information where it is necessary to identify you or your customer entity to assess and establish the financial product or service you have requested.

### **3.1.2 Your Rights and the Disclosure of Personal Information**

You need not give personal information about yourself that may be requested by us to supply the Bank's financial products and services. However, without some or all of that information, the Bank may not be able to provide you with the financial products or services you requested.

### **3.1.3 Use of Information (National Privacy Principle 2)**

The Bank collects your personal information and uses the information to provide financial products and services requested by you. The Bank may use your personal information for related purposes, such as a credit agency reference, in accordance with the National Privacy Principles.

Your personal information may also be used to complete business functions within the Bank such as internal auditing, management reporting, research, product development and planning.

### **3.1.4 Disclosure of Information (National Privacy Principle 2)**

In providing financial products and services to you the Bank may disclose your personal information to organisations that carry out functions on the Bank's behalf. This may include but not be limited to sales agents to deliver financial products and services, legal firms and conveyancers for loan establishment purposes, mailing houses for the purposes of issuing statements and other correspondence relating to your account(s) with us, external auditors, computer and information technology service providers for computer, internet, network distribution and related functions, plastic card and cheque book manufacturers and distributors.

Although the Bank undertakes its best endeavours to ensure your personal information is safeguarded in a manner consistent with the Bank's privacy statement and only used to carry out functions on the Bank's behalf the Bank cannot accept liability for any misuse of your personal information by those organisations or individuals.

The Bank may also collect and / or disclose your personal information to Elders Limited and Bendigo and Adelaide Bank Limited and their associated companies as agents and the providers of computer, network and other services.

### **3.1.5 Marketing**

In accordance with the National Privacy Principles the Bank may also collect from and / or disclose your personal information to the Bank, Elders Limited and Bendigo and Adelaide Bank Limited and their associated companies to send direct marketing material about other products and services that may be of interest to you. If you do not want to receive information about these products and services at any time please tell us by calling our Customer Service Centre on **1300 660 115**. This does not preclude you from being provided with information about terms and conditions, statements and other information specific to your existing accounts or services.

### **3.1.6 Data Quality (National Privacy Principle 3)**

The Bank must ensure your personal information collected, used or disclosed is, at all times, accurate, complete and up to date. You should advise us immediately when you become aware that any information we hold about you is incorrect or out of date. The Bank undertakes to amend its records as soon as practical after it is advised subject to the validity of the request being confirmed.

### **3.1.7 Data Security (National Privacy Principle 4)**

The Bank will take all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access modification and disclosure. Your information may be stored in paper or electronic format. Security measures implemented with respect to the Bank's IT systems take account of internal recommendations, general industry practice and technological development in the provision of IT security services. The Bank and its contract network suppliers recognise the highest levels of computer network security must be maintained at all times. The Bank and its network suppliers constantly review security levels and the latest in technological development to ensure the protection of personal information.

The Bank's IT security measures include state of the art firewall technology, encryption of internet and phone bank services and provision of a unique combination of user identification and password codes to your account(s).

When using our internet banking service we use "cookies" to ascertain your product preferences and tailor future visits to the site to suit them. Most web browsers can be configured to not accept cookies however the site functionality may be restricted as a result. Other than statistical information we do not collect information about you through our website other than where you provide it.

The Bank uses secure methods to destroy or de-identify any personal information as soon as the law permits, provided the information is no longer needed by the Bank for any purpose for which the information may be used or disclosed under the National Privacy Principles.

### **3.1.8 Openness to the Bank's Practices (National Privacy Principle 5)**

The Bank has developed procedures addressing information handling practices. Information in this statement gives you some insight into how the Bank manages your personal information and your rights.

### **3.1.9 Access (National Privacy Principle 6)**

You are entitled to access personal information we may hold about you. The type of information that you may request is your personal information which may include any comments, opinions and file notes that the Bank holds about you.

The Bank will process your request within a reasonable time, generally 14 days for a straight forward request, however additional time may be needed depending on the nature of the request.

There is no fee for lodging a request for personal information however the Bank reserves the right to recover reasonable costs associated with processing the request. You will be advised the cost, if any, before we proceed.

The Bank is not required to provide you with access to your information in some cases, for example where the law allows the Bank to deny access. If the Bank denies you access to your information you will be advised the reason why.

A request to access your personal information must be directed to the Bank Privacy Officer by:

Telephone    **1300 660 115**  
Fax            **08 8425 4111**  
Post           **GPO Box 551 Adelaide South Australia 5001**  
Email         [service@eldersruralbank.com.au](mailto:service@eldersruralbank.com.au)

### **3.1.10 Correction**

You may ask the Bank at any time to correct personal information we hold about you. The Bank undertakes to correct the information within a reasonable time provided we have confirmed the validity of your request. If the validity of your request cannot be confirmed by the Bank you will be advised the Bank has not acted on it and the reason why. If the Bank disagrees with your request to correct information it holds, you have the right to request a statement be held with that information noting that your information is not accurate, complete or up to date.

### **3.1.11 Identifiers (National Privacy Principle 7)**

Identifiers are unique numbers that a Commonwealth Government agency has assigned to you. These include tax file numbers and Medicare numbers.

### **3.1.12 Anonymity (National Privacy Principle 8)**

In complying with the National Privacy Principles the Bank must allow its customers to interact anonymously wherever it is lawful and practical to do so.

### **3.1.13 Trans Border (overseas) Data Flows (National Privacy Principle 9)**

Should you request a transaction or service where your personal information may be transferred to another country, your information may be transferred to a country that does not have the same privacy laws as Australia. This may occur in instances where you request an international telegraphic transfer where your name and account details may be divulged.

### **3.1.14 Sensitive Information (National Privacy Principle 10)**

If it is necessary to record sensitive information (such as health related information), we must obtain your specific consent to collect that information. Sensitive information is generally not required for banking and financial services. You are entitled to access any information that we record except where the law allows the Bank to deny access.

## **4.0 100 Point Check**

The Financial Transaction Reports Act (Cth) (1988) ("FTRA") requires the Bank to obtain certain information in a prescribed manner from you where you wish to act as a signatory to an account. The Bank may undertake independent checks as prescribed in the FTRA and its regulations to verify you.

Identifiers that may be collected to establish your personal identity to comply with the FTRA are not re-used to confirm your identity, in accordance with the National Privacy Principles. The Bank may retain photocopies of documents presented to it in support of the FTRA compliance requirements.

## **5.0 Information required for Statutory Compliance Purposes**

In addition to questions the Bank may ask to ensure general bank account statutory compliance there may be special circumstances where the Bank or its agents are required to seek additional information about you.

An example of this is the Farm Management Deposit (FMD) account where the regulations applicable to the account are administered by the Agriculture Fisheries Forestry Australia (AFFA) department of the Commonwealth Government.

## **6.0 Further Information or Questions**

The Bank's Customer Service Centre is your point of contact for any privacy inquiry. The Customer Service Centre will make a preliminary assessment of the inquiry and where necessary refer the matter to our Privacy Officer.

The Bank has a Privacy Officer appointed to manage, investigate, coordinate and respond to your inquiries, disputes lodged, information access and correction requests in accordance with the Bank's procedures and the National Privacy Principles.

All inquiries will be managed consistently with the National Privacy Principles, the terms outlined in your account or service terms and conditions and the Bank's general procedures. The Privacy Officer will also provide you with contact details for the Privacy Commissioner if required where the Bank is unable to resolve a dispute to your satisfaction.

The Bank's Customer Service Centre and Privacy Officer can be contacted between 8am and 6pm CST Monday to Friday (except National public holidays) by:

Telephone **1300 660 115**  
Email [service@eldersruralbank.com.au](mailto:service@eldersruralbank.com.au)  
Facsimile **08 8425 4111**  
Post **GPO Box 551, Adelaide SA 5001**

Further information may be obtained from our website at [www.eldersruralbank.com.au](http://www.eldersruralbank.com.au)