



Bank of Baroda, Sydney Branch
(ARBN 125 314 249)

Privacy Policy

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1. Purpose of this document

This document contains the privacy and credit reporting policy for Bank of Baroda, Sydney Branch.

You can use this document to understand how we manage the personal information and/or credit information of our customers and other individuals we deal with.

In the document, you'll find information about:

- (a) who we are and what we do;
- (b) the types of information we may collect;
- (c) how, when, and from whom, we may collect personal and/or credit information;
- (d) the purposes for which we may collect, hold, use, or disclose personal and/or credit information;
- (e) to whom we may disclose your credit information;
- (f) how we protect the personal and/or credit information we hold;
- (g) how you may request access to your personal and/or credit information;
- (h) how you can correct personal and/or credit information we hold about you; and
- (i) how to contact us, including how to make a complaint about how we have handled your personal and/or credit information.

We reserve the right to make changes to this privacy policy as often as necessary without notice to ensure it remains up-to-date and effective.

2. About Us

Bank of Baroda, Sydney Branch (ARBN 125 314 249) is a branch of Bank of Baroda India, an Indian state-owned banking and financial services company that has an international presence in 26 countries.

In the remainder of this document, we refer to Bank of Baroda, Sydney Branch as "we", "us", or "our".

We pride ourselves on our ability to provide personalised services to each of our clients, and on our ability to protect your privacy. In Australia, this means we must comply with the *Privacy Act 1988* (Cth) ("*Privacy Act*"), and the Australian Privacy Principles ("*APPs*"), upon which this policy is based. The APPs outline how we can collect, use, hold, and dispose of your personal information, and how we ensure the quality and security of this information.

Our contact details are provided below in section 10 of this policy.

3. Types of information we collect

3.1 Personal Information

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is:

- (a) true or not; and
- (b) recorded in a material form or not.

For the purposes of this policy, personal information includes:

- (a) identification and contact information such as your current and any former names, date of birth, current and previous addresses, other contact details, and Tax File Number;
- (b) financial information, such as your income, expenses, commitments, debts, savings and investments;
- (c) your gender and relationship status such as whether you are married, single, or in a de facto relationship, and the number and/or ages of children or persons you maintain;
- (d) sensitive information (see section 3.3).

3.2 Credit Information

If you apply for credit with us, or if you propose to be a guarantor for someone else's credit application, we may collect credit information about you that allows us to assess whether providing credit is appropriate for you or for us.

We may also disclose your credit information to other organisations to allow others to assess your credit worthiness. See sections 4.2 and 4.5 for more information about our collection, use and disclosure of credit information.

Credit information includes:

- (a) identification information;
- (b) details about existing consumer credit you have, including the provider, and details of the loan including the amount and any terms and conditions;
- (c) whether or not you've met existing loan repayment deadlines;
- (d) a statement that we have sought information from a Credit Reporting Body ("CRB") in relation to an application you have made for consumer or commercial credit, or for a credit application for which you are, or have been proposed to be, the guarantor;
- (e) in relation to a request in (d), above, information about the type and amount of consumer or commercial credit sought in the application;

- (f) details about any payments of at least \$150 (or another amount prescribed by regulation) that you are at least 60 days overdue in making to us, when we have provided you with written notice requesting payment of the overdue amount, and any repayments you make towards such amounts;
- (g) information about changes to the terms or conditions for consumer credit we have provided to you, or the provision of new consumer credit to you, because you had been overdue in making payments under your original consumer credit;
- (h) court proceedings information about you;
- (i) details entered about you on the National Personal Insolvency Index;
- (j) publicly available information about your general credit worthiness; and
- (k) whether you've committed any serious credit infringement, such as actual or attempted fraud relating to consumer credit.

3.3 Sensitive Information

Sometimes, we need to collect sensitive information about you, such as health information in relation to some insurance applications. We may also collect other sensitive information about you, such as:

- (a) your racial or ethnic origin;
- (b) your religious beliefs;
- (c) your membership of political, professional or trade associations; or
- (d) your criminal record.

Unless required by law, we will only collect sensitive information with your consent.

4. Collecting information

4.1 No obligation to provide information

You are under no obligation to provide personal information we ask for and we cannot force you to provide personal information that you do not wish to provide.

However, if you fail or refuse to provide any information we ask for, we may not be able to do any or a combination of the things mentioned in section 5, below.

In some cases, if we do not collect, use and/or disclose the information we ask for, we may not only risk providing you an unsuitable product or service, but we also may be in breach our legal or a regulatory obligations.

4.2 Credit Information – important things you should know

If the information we are collecting includes credit information you should be aware of the following matters:



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- (a) We are likely to disclose your information to Veda Advantage Ltd ("Veda"), a CRB whose contact details are available from www.veda.com.au;
- (b) Veda may include the information we disclose to them in reports provided to other credit providers to assess your credit worthiness (as defined in the *Privacy Act*);
- (c) If you fail to meet your payment obligations in relation to a consumer credit contract you enter with us, or you commit any serious credit infringement, such as actual or attempted fraud relating to consumer credit, we are entitled to disclose this to the Veda;
- (d) You can contact Veda through www.veda.com.au to:
 - (1) obtain their credit information management policy;
 - (2) request them not to use your credit reporting information for the purposes of pre-screening for direct marketing by a credit provider; and
 - (3) request them not to use or disclose your credit reporting information, if you believe on reasonable grounds that you have been, or you are likely to be, a victim of fraud; and
- (e) You can also contact us to access and/or correct your credit information in accordance with sections 8 and 9, below.

4.3 Collecting information from you

Usually, we will collect personal information directly from you and with your consent. Some of the ways we collect information from you include:

- (a) when you complete a paper or online form;
- (b) when you visit us;
- (c) when we speak to you on the telephone;
- (d) when you participate in market research or a customer survey;
- (e) when you've used our website or internet banking services, including collecting information using website Cookies when you've accessed third party sites;
- (f) when we've communicated with you through electronic means such as email or SMS.

We may collect your personal information if you have applied for, or we have agreed to provide you with, any of our products or services.

We can collect this information when you have applied for any of our products or services, or when you use any of our products or services, including when you make purchases or transfer money from accounts held with us.

4.4 Collecting information from others

We may collect information about you from others in relation to a product or service we have agreed to, or are proposing to, provide to you. For example, we might collect information from your accountant, lawyer, adviser, broker, agent, employer, guarantor, or family member.

We will usually only collect information from third parties with your express or implied consent. We might also collect information from another organisation within the Bank of Baroda Group, if the primary purpose for which that organisation collected your information was or is related to the primary purpose for which we would collect your information.

If it is unreasonable or impracticable for us to collection personal information from you, we may collect it from someone else.

4.5 Collecting your credit information

In addition to the circumstances mention in sections 4.3and 4.4above, we may collect credit information from a CRB when we assess a credit application you have made or you have made on behalf of a business, organisation or agency. A CRB is an organisation or agency prescribed under the *Privacy Act* that collects, holds, uses or discloses personal information about individuals for the purposes of providing others information about the credit worthiness of an individual.

We may also collect and use credit information in our own records including information on your payments, repayments or default. Sometimes, we may obtain credit information from other credit providers with whom you have or had a credit account, or from publicly available sources.

4.6 Unsolicited information

If we receive your personal information, and we have not asked for it, we may decide to keep that information, if we determine that we would be entitled to collect that information had we sought it directly. If this happens, we will take reasonable steps to notify you that we have received the information and seek your consent to handle the information in accordance with this policy.

If we decide that we would not have been entitled to collect that information, we will destroy or de-identify it, unless the information is contained in a Commonwealth government record.

If the information is contained in a Commonwealth government record, we will attempt to return the information to you, and failing that, we will return the record to the relevant Commonwealth government agency.

5. Why we collect, use, hold, and disclose your information

We collect, hold, use and disclose your personal information for so that we can:

- (e) assess and process applications for our products and services;
- (f) manage your existing accounts with us;



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- (g) collect overdue payments from you;
- (h) comply with our legal and/or regulatory obligations, and assist government and law enforcement agencies;
- (i) manage our risk exposure;
- (j) train our staff;
- (k) conduct market and product research;
- (l) develop products and services;
- (m) instruct our external service providers such as lawyers, accountants, auditors and insurers; and
- (n) carry out direct marketing, including telling you about our other products and services or those of our related organisations.

We may also collect, use and disclose your information for other reasons, where permitted or required by law.

6. Who we disclose your information to

We may share your personal information with our related organisations.

Sometimes, we may share your information with other people or organisations too, where this is permitted by law, or for any of our purposes outlined in section 5, above.

Third parties include:

- (a) those involved in providing, managing or administering your product or service;
- (b) other organisations involved in our normal business practices, including our agents and contractors;
- (c) our external advisers, including our accountants, auditors, and lawyers;
- (d) CRBs and other credit providers;
- (e) those to whom we outsource functions including to direct marketers, debt collectors, and technical support providers;
- (f) brokers, agents, advisers, and others acting on your behalf such as guardians or persons holding powers of attorney;
- (g) guarantors;
- (h) persons involved in arrangements that provide funding to us, such as rating agencies, advisers, investors, or trustees;
- (i) government and law enforcement bodies, and organisations that work to identify illegal activities and fraud;



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- (j) other financial institutions, such as other banks;
- (k) providers that assist us in processing claims, such as investigators or assessors, surveyors, valuers, insurers, re-insurers, underwriters;
- (l) medical professionals, medical facilities or health authorities who verify any health information you may provide; and
- (m) loyalty program partners.

6.1 Disclosing your information overseas

Sometimes, it may be necessary to send your personal information overseas – for example, where we outsource functions overseas, send information to our head office and other branches in India and overseas, where we need to complete a particular transaction on your behalf or where this is required by laws and regulations in Australia, India or in another country.

You can view a list of countries where we have an overseas presence by visiting www.bankofbaroda.com/overseasbranch.asp.

7. How we keep your information secure

We will take all reasonable steps in the circumstances to protect your personal information and credit information that we hold from unauthorised access, misuse, interference, loss, disclosure or modification.

Some of the ways we do this are:

- (a) staff training and confidentiality requirements;
- (b) electronic security systems, such as firewalls and data encryption on our websites;
- (c) building security systems;
- (d) ensuring appropriate arrangements are in place with third party data storage providers who may handle or store physical or electronic data;
- (e) destroying personal information, or any document or record containing personal information, if we no longer need the information or we are not legally required to keep the information, document, or record;
- (f) when it is not practicable to destroy the information or the document or record containing the personal information, we will put the document "beyond use" (as defined in the Credit Reporting Code);
- (g) in some circumstances, such as if we are required under Australian law to keep the information, document or record, we may de-identify personal information.

8. Accessing your information

8.1 Verification before giving access

Whenever you contact us, we will verify your identity or that of any person you have authorised to be given access to your personal information or credit information before we agree to give access.

We reserve the right to change our identity verification requirements from time to time without notice.

8.2 Timeframe for giving access

When you request access to your personal information, we will verify your identity and will try to respond to your request within a reasonable period of time after verifying your identity.

When you request access to your credit information, we try to provide access to you within 30 days of receiving your request, unless unusual circumstances apply.

If we're not able to respond within the above timeframes, we'll try to arrange an extended timeframe with you. If there are further delays, we will keep you informed about the progress of your request and let you know about your options for making a complaint about the delay.

8.3 Manner of access

You can specify the form or manner in which you'd like to receive your information, and where reasonable and practicable to do so, we will give you access to your information in the form or manner you have requested.

8.4 Fees and charges

In general, we will not charge you a fee for making a request for access to your personal information.

Where the request for access relates to credit information, we won't charge a fee for an initial request, but we may charge a fee for retrieving, preparing, and providing the information you ask for. If there is a fee, we may ask you to pay it prior to processing your request.

8.5 We may refuse access

Sometimes, we may refuse to give you access to your personal and/or credit information. Some reasons we may refuse access include where access could threaten an individual's or the public's health or safety, where access could interfere with the activities of a law enforcement body, where access is unlawful, where a law or court/tribunal order requires or authorises access be denied, or where the information is commercially sensitive.

If we refuse access, we will notify you of our reasons for this, except where it would be unreasonable to do so. Our notice will also provide details about the mechanisms available to you to make a complaint about the refusal.

9. Correction of your information

9.1 We may correct information ourselves

If we are satisfied on reasonable grounds that the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take appropriate steps to correct the information.

We may terminate a product or service we have agreed to provide you if we find that personal information we relied on to offer you the product or service was not accurate, complete or up-to-date at the time we collected or used it.

If we correct your information, we will take steps to notify any other organisation to which we had previously provided the now-corrected personal information that your information has been corrected.

9.2 You can ask us to correct information

You can also ask us to correct your personal or credit information by contacting us using the details at section 10.1. If we had provided that information to another organisation previously, you can also ask us to notify that organisation of the correction.

9.3 Timeframe for correcting information

If your request relates to personal information, we will respond to the requests within a reasonable period of time of receiving it.

If the request relates to credit information, we will respond to the request within 30 days from the date you make the request.

If we're not able to respond within the above timeframes, we'll try to arrange an extended timeframe with you. If there are further delays, we will keep you informed about the progress of your request and let you know about your options for making a complaint about the delay.

9.4 No fees for making request

We will not charge any fees to you for making a request to correct your information.

9.5 When we refuse to correct information

If we refuse to correct your personal information, we will give you a written notice that sets out:

- (a) the reasons for the refusal, except to the extent that it would be unreasonable to do so; and
- (b) your rights to complain about our decision, including referring it to an external dispute resolution scheme of which we are a member or referring it to the Privacy Commissioner; and
- (c) any other matter prescribed by regulations introduced under the *Privacy Act* to be mentioned in the written notice.

9.6 Request to associate a statement

If we refuse to correct your personal information, you may request us to associate a statement with the personal information that you believe the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Within a reasonable period of time after receiving your request, we will take any step that is reasonable, practicable and lawful in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information.

We will not charge any fee for such a request.

10. Contacting us and making complaints

10.1 Contacting us - privacy

If you have questions or concerns about our privacy policy and practices, or you'd like to make a complaint about how we collect, use and/or disclose your information, please contact us using the details below.

You should also contact us if you'd like to access or correct your information, or if you'd like a printed version of this policy.

Mail: The Chief Executive Officer
Bank of Baroda Sydney
Suite 701-702, Level 7, 265 Castlereagh Street
Sydney NSW 2000

10.2 Contacting us – direct marketing

If you'd like us to stop sending you direct marketing offers, please send your request in writing using the contact information:

Email: compliance.sydney@bankofbaroda.com

Mail: The Manager Risk and Compliance
Bank of Baroda Sydney
Suite 701-702, Level 7, 265 Castlereagh Street
Sydney NSW 2000

10.3 Making a complaint

If you'd like to lodge a complaint, please contact us by visiting us, calling us, or writing to us using the details at section 10.1. We try to acknowledge all requests or complaints as quickly as possible, and if your complaint is about credit-related information, we will acknowledge it within 7 days.

We aim to provide final responses to complaints within 30 days for a credit-related complaint, or 45 days for most other complaints. We will keep you updated on the progress of your complaint, and if we can't provide you with a final response within the above timeframes, we'll contact you to explain why and discuss a revised timeframe.

Sometimes, we may seek advice from our own legal or other professional advisors in relation to your request or complaint.

If the complaint concerns credit information, we may also consult with external organisations or agencies, such as a CRB.

10.4 External review of complaints

If you are not happy with our response to your request or complaint, you can refer it to our external dispute resolution scheme or to the Privacy Commissioner

For complaints about financial products and services, please contact the Financial Ombudsman Service (FOS). FOS offers a free and independent dispute resolution service for these products and services.

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| Mail: | Financial Ombudsman Service Limited GPO Box 3 Melbourne VIC 3001 |
| Phone: | 1800 367 287 |
| Website: | www.fos.org.au |

You may also contact the Privacy Commissioner if you are not satisfied with it. The Privacy Commissioner's contact details are:

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| Mail: | Privacy Commissioner GPO Box 5218 Sydney NSW 2001 |
| Online | Complete the privacy complaint form at https://forms.business.gov.au/aba/oaic/privacy-complaint/ |
| Telephone: | 1300 363 992 |
| Email: | enquiries@oaic.gov.au |