



# Privacy Policy

Date: 1, June 2021

Version: 0.4

## Contents

<b>1. Information Schedule</b>	3
<b>2. Introduction</b>	4
<b>3. What is personal information?</b>	4
<b>4. What is sensitive information?</b>	4
<b>5. What is credit information?</b>	4
<b>6. What types of personal and credit information do we collect?</b>	5
6.1 Customers and prospective customers	5
6.2 Investors	5
6.3 Working for Judo and prospective employees	6
6.4 Suppliers or contractors	6
<b>7. How do we collect your personal and credit information?</b>	6
<b>8. Why do we need your personal and credit information?</b>	7
<b>9. How we use and disclose your personal and credit information</b>	8
9.1 Personal information disclosure	8
9.2 Credit information disclosure to a credit reporting body	9
9.3 Credit information disclosure to others	9
<b>10. Direct marketing</b>	10
<b>11. Do we send information to overseas recipients?</b>	10
<b>12. How does Judo hold your personal and credit information?</b>	10
<b>13. How can you access and correct your personal and credit information?</b>	11
<b>14. Complaints</b>	11
<b>15. Changes to this policy</b>	12
<b>16. Further information</b>	12

## 2. Introduction

This policy outlines how Judo Bank Pty Ltd ACN 615 995 581, ACL and AFSL 501091 and its related bodies corporate (**Judo, we, us or our**) seek to manage personal information (including sensitive information and credit-related personal information) about individuals, including Judo's customers and prospective customers, in accordance with the *Privacy Act 1988* (Cth) (the **Privacy Act**), the Australian Privacy Principles set out in the Privacy Act and the *Privacy (Credit Reporting) Code 2014* (the **CR Code**) as applicable.

Where applicable, we will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the Privacy Act and any other applicable exemptions in the Privacy Act or other legislation.

## 3. What is personal information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information is true.

## 4. What is sensitive information?

Under the Privacy Act, 'sensitive information' is defined as information or an opinion about an individual's:

- racial or ethnic origin
- political opinions
- political association membership
- religious beliefs or affiliations
- philosophical beliefs
- professional or trade association membership
- trade union membership
- sexual orientation or practices
- criminal record
- health information
- genetic information
- biometric information or templates

We will not collect, use or disclose any sensitive information about you unless we need this information for one or more of our functions or activities and we have your consent, or it is required or authorised by law (such as when you are applying for hardship relief).

## 5. What is credit information?

Credit information may include, for example, information about:

- your consumer credit accounts (past and present), including credit limits and repayment history;
- consumer credit payments that you are overdue in making as a borrower or guarantor;
- any Australian court judgement against you in relation to credit you received or applied for;
- you that is in the National Personal Insolvency Index; and
- your credit worthiness that is publicly available.

Consumer credit means credit that is intended to be used wholly or primarily for personal, family or household purposes or in relation to residential property for investment purposes.

## 6. What types of personal and credit information do we collect?

Below we summarise some of the main types of personal information that we collect. In addition to these types of personal information, we may collect other personal information as permitted or required by law.

### 6.1 Customers and prospective customers

We may collect a range of personal or credit information to:

- enable us to assess, offer and manage any products and services requested by our customers and prospective customers;
- identify you or confirm your tax residency status as required by any law, tax treaty or intergovernmental taxation information sharing agreement;
- respond to queries from our customers and prospective customers; and
- allow customers, prospective customers or other members of the public to enter a competition or other activity that we run.

The types of personal information that Judo collects about such people (and about employees and officers of customers and prospective customers and other individuals who act or propose to act as guarantors for customers) may include name, date of birth, residential address, postal address, email address, telephone numbers, gender, occupation, place of work, nominated bank account details, internet banking log-in details, tax file number, transaction and account balance information, information about product preferences, online behavior and response to various marketing initiatives, and credit information.

Judo may also require personal information to confirm your identity, such as information from or copies of your:

- driver's licence;
- passport;
- birth certificate; and
- utility bills.

The types of credit information that Judo collects about you may include information about:

- the type and amount of credit sought in a credit application made by you or by a person for whom you are, or propose to be, a guarantor, and the names of relevant credit providers to whom an application was made;
- details of other credit providers to you, including the nature and maximum amount of credit to be provided and the dates of those arrangements;
- any defaults by you, or a person for whom you are or propose to be a guarantor, on other credit facilities;
- payments or any new arrangements made by you in respect of any defaults previously recorded with a credit reporting body;
- details about credit-related court proceedings and personal insolvency information related to you;
- whether, in the opinion of another credit provider, you have committed a serious credit infringement;
- information about your history of making repayments in relation to other credit facilities; and
- your credit worthiness, such as your credit score and risk rating, obtained from a credit reporting body.

### 6.2 Investors

We may collect a range of personal information relating to individuals who are investors in, or associated with investors in, Judo. This may include:

- name;
- residential and/or business address;

- postal address;
- email address;
- telephone numbers;
- bank account details;
- tax file number;
- personal information to confirm your identity, such as information from or copies of your driver's licence or passport;
- number of shares held;
- your Australian Business Number or the Australian Business Number or Australian Company Number of any business or company associated with you;
- the name of any trust associated with you, and other information relating to the trust such as the name of the trustee and details of any corporate trustee (including the names of the directors, company secretary and shareholders of that corporation); and
- the names of any additional contact people nominated by you, such as your accountant, representative or manager.

### **6.3 Working for Judo and prospective employees**

If you wish to be employed or engaged by Judo (directly or indirectly, e.g. as an employee of a labor hire company) we will require personal information about you that may include your:

- name;
- residential address, postal address and email address;
- telephone number;
- academic results and qualifications;
- expertise and experience;
- employment history;
- personal interests;
- current salary and salary expectations; and
- background information about you including, for example, your criminal record or credit history.

### **6.4 Suppliers or contractors**

If you are a supplier of goods or services to, or are contracting with, Judo, or are employed or engaged by such a supplier or contractor, we may collect personal information about you including:

- name;
- business address and email address;
- telephone number; and
- position.

## **7. How do we collect your personal and credit information?**

The main way we collect personal and credit information about you is when you give it directly to us, or when we receive it from a third party whose details you give us e.g. a referee (if you seek to work for us) or a guarantor or anyone else listed on a credit application form. We often gather this information through application forms, via surveys or through other communications via email or telephone (for example when you contact us to ask for information).

We may also collect your personal and credit information from external sources such as:

- employers, accountants, real estate agents or any referees you nominate;
- persons authorised by you to provide us with information (such as a lawyer, financial adviser, intermediary or third party organisation or service provider we exchange information with in order to provide or promote products and services to you, such as an accounting platform, data aggregator, technology service provider, other financial institution or organisation);
- other credit providers;
- credit reporting bodies;

- third-party brokers and other parties that may have introduced you to us;
- public sources such as the National Personal Insolvency Index;
- third party identity management providers (for example, Google or LinkedIn);
- regulators and other government entities; and
- our related bodies corporate.

Judo may also collect your personal information in any of the following ways:

- **social media:** if you access a social media page operated by us, the information we collect about you may include your user ID and/or user name associated with that social media service, any information or content you have permitted the third party social media service to share with us, such as your profile picture, email address, followers or friends lists, and any information you have disclosed in connection with that social media service;
- **our website:** each time you visit our website, we may collect information about your use of the website. This may be from internet browsing or accessing our website via mobile or tablet applications;
- **search engines, third party websites and social media pages:** for example, if you apply for a job with us, we may conduct background checking through these means;
- **cookies:** we may use technology called 'cookies' when you visit our website. Cookies can record information about your visit to our website. The cookies we send to your computer cannot read your hard drive or command your computer to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Judo site. Your web browser may allow you to turn off cookies. Turning off cookies may restrict your use of our website and access to your accounts;
- **private messaging:** we may invite you to send your details to us via private messaging, for example, to answer a question about your account;
- **participation in activities or competitions:** you may also be invited to share your personal information through secure channels to participate in other activities, such as competitions; and
- **derived credit information:** we may derive credit information from your dealings with us in relation to credit, e.g. when you make payments to us. We may also combine credit reporting information from a credit reporting body with our own information relevant to your credit worthiness, to derive further information about your credit worthiness which we may use to determine whether to offer credit to you (and if so, on what terms).

To enable Judo to assess a credit application by you or in which you are listed, Judo may obtain a report from a credit reporting body setting out credit reporting information about you, and setting out any other information in relation to the commercial credit activities of all individuals listed on the credit application.

Where you have consented, Judo may obtain from, and give to, any credit provider named in a credit application and any credit provider that may be named in a credit report issued by a credit reporting body, information about your credit arrangements.

## 8. Why do we need your personal and credit information?

Judo collects personal and credit information in order to:

- understand and manage our customers' needs;
- provide our customers with products and services;
- identify you or verify your identity, details or ability to transact on an account;
- confirm your tax residency status as required by any law, tax treaty or intergovernmental taxation information sharing agreement;
- develop and improve our products, services and business;
- identify your behavior, habits and preferences;
- market Judo's and others' products and services to you;
- assess your creditworthiness;
- assist you with enquiries or complaints;

- participate in the credit reporting system, including to provide credit information to credit reporting bodies and assist other credit providers in accordance with applicable legislation;
- manage our human resources functions;
- enable us to comply with our legal and regulatory obligations;
- assist us to manage risk including to protect against fraud, misconduct and unlawful activity;
- enable us to manage complaints, investigations and legal proceedings;
- enable the management and recovery of debts;
- consider you for employment or a contractor position with us;
- manage our relationships with our investors;
- do business with our contractors or suppliers of goods and services (you may be a contractor/supplier, or employed or engaged by a contractor/supplier);
- notify you if you have won a competition;
- carry out research and analysis related to our products and services;
- protect our rights and property and those of our customers; and
- pursue any other purpose required or permitted by law.

We may also use your credit information to:

- assess an application for credit;
- assist you to avoid defaulting on your credit obligations;
- assess whether Judo ought to accept you as a guarantor in relation to an application for credit; and
- assess whether you have committed a serious credit infringement.

If you do not provide us with your personal information or credit information, our ability to provide you with a specific product or service may be limited.

## **9. How we use and disclose your personal and credit information**

We may use and disclose your personal information and credit information for any of the purposes outlined above.

Further information about specific uses we may make of your personal information and credit information, and third parties to which we may disclose your personal information and credit information, is set out below.

The information below is not intended to be exhaustive and there may be other third parties to which we provide your personal information or credit information where required or permitted by law.

### **9.1 Personal information disclosure**

The persons or organisations to which we disclose your personal information could include:

- our related entities to facilitate our and their internal business processes;
- other organisations with whom we have affiliations so that they may provide you with information about our products and services and various promotions;
- third party service providers who assist us in operating our business (for example, credit reporting bodies, marketing service providers, third party identity management providers and other technology service providers);
- debt collectors;
- our financial advisers, consultants, insurers, legal advisers, auditors and other professional services providers;
- organisations involved with us in a corporate re-organisation or involved in a transfer or potential transfer of all or part of the assets or business of our organisation, and the advisers of and professional services providers to those organisations;

- organisations involved in the provision or potential provision of finance to, or any capital raising by, Judo, and the advisers of and professional services providers to those organisations;
- organisations involved in our payments systems including financial institutions, merchants and payment organisations;
- regulators and law enforcement agencies; and
- other organisations as required or authorised by law or where you have given your consent.

Where practical, Judo will use reasonable commercial efforts to ensure third parties to whom we disclose your personal information are subject to confidentiality requirements in relation to that information.

## 9.2 Credit information disclosure to a credit reporting body

We may disclose credit-related personal information to a credit reporting body in order to obtain credit eligibility information about you or if you fail to meet your payment obligations or commit a serious credit infringement. Where the information disclosed is default information in relation to consumer credit, Judo will not disclose it to the credit reporting body unless at least 14 days have passed after we have given written notice of our intention to disclose this information.

We may disclose any information, including personal information, in relation to commercial credit, to a credit reporting body or to another credit provider.

Judo may disclose credit information to the following credit reporting bodies:

### **Equifax Australia**

Equifax, Consumer Resolutions  
PO BOX 964  
North Sydney NSW 2059

### **Illion Australia**

PO BOX 7405  
St Kilda Road  
Melbourne Vic 3004  
03 9328 3447

### **Experian Australia**

Attn: Credit Report  
PO BOX 1969  
North Sydney NSW 2060  
1300 783 684

[customercomplaintsAU@equifax.com.au](mailto:customercomplaintsAU@equifax.com.au)  
[www.equifax.com.au](http://www.equifax.com.au)

[chc-au@illion.com.au](mailto:chc-au@illion.com.au)  
[www.illion.com.au](http://www.illion.com.au)

[creditreport@au.experian.com](mailto:creditreport@au.experian.com)  
[www.experian.com.au](http://www.experian.com.au)

Each of these credit reporting bodies is required to have a policy about how it manages credit-related personal information. If you would like to read this policy, visit the credit reporting body's website.

You have the right to request that a credit reporting body does not use your credit reporting information for the purpose of pre-screening of direct marketing. You also have the right to request that a credit reporting body does not use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud (e.g. if you suspect someone may use your identity to apply for credit). These requests should be made directly to the credit reporting body.

## 9.3 Credit information disclosure to others

From time to time Judo may also disclose credit information about you to:

- a potential guarantor or person who proposes to provide security for credit, where you are the borrower or are associated with the borrower and have consented to this;
- a debt collection agency for the purposes of collecting an overdue payment;
- a person for an external dispute resolution purpose;
- any entity to which we are authorised or required by law or a court/tribunal to disclose it;
- a regulatory or law enforcement body if we believe on reasonable grounds you have committed a serious credit infringement;
- an entity or their professional, legal or financial advisers for specified commercial purposes permitted under the Privacy Act;

- a guarantor or a person who has provided security for credit, where you are the borrower or are associated with the borrower and have consented to this (or without your consent where we enforce a guarantee for commercial credit or consumer credit);
- any specific parties that we have advised you, at the time of collection of your personal or credit information, that we might disclose your credit information to such as an employer, estate agent or referee;
- any other person or entity where you have given your consent, and
- any other person or entity as otherwise permitted in accordance with this policy.

## 10. Direct marketing

Direct marketing involves communicating directly with you for the purpose of promoting goods or services to you and providing you with special offers from Judo, its related entities or its third-party business partners. Direct marketing can be delivered by a range of methods including mail, telephone, email or SMS.

We may use and disclose your personal information for the purpose of direct marketing to you where:

- you have consented to us doing so; or
- it is otherwise permitted by law.

You can unsubscribe from our direct marketing, or change your contact preferences, by contacting us (our contact details are in section 16 of this policy).

## 11. Do we send information to overseas recipients?

Judo generally avoids offshore hosting and servicing of customer information and does not generally disclose your personal information and credit information to overseas recipients.

However, we may do so if we have taken reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to that information.

Further, we are not required to take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to that information if:

- we reasonably believe that:
  - the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way the Australian Privacy Principles protect the information; and
  - you can take action to enforce that law or scheme; or
- you have consented to such an arrangement; or
- it is otherwise required or authorised by law.

## 12. How does Judo hold your personal and credit information?

The security of your personal and credit information is important to us.

We store your personal information in different ways, including in paper-based, electronic and other formats. We may use cloud computer storage facilities to store the personal and credit information we hold about you.

We take reasonable precautions to protect the personal information and credit information we hold from:

- misuse, interference and loss; and

- unauthorised access, modification or disclosure.

These include electronic and physical security measures and ensuring all our staff are trained to respect the security and confidentiality of our customers' information.

If we no longer need your personal or credit information and are not required by law to keep it, we will take reasonable steps to delete, destroy or de-identify it.

### **13. How can you access and correct your personal and credit information?**

Judo takes reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. Accuracy depends on the information provided to Judo.

You have the right to seek access to your personal information held by Judo and to request correction of the information. If you wish to do so, you may contact us at [privacy@judo.bank](mailto:privacy@judo.bank) or by phone on **13 JUDO**.

We may require evidence of your identity as part of the process of providing you with access to your personal information or correcting your personal information.

There are no fees associated with making a request to access or correct your information. However, we may charge a reasonable fee for processing an access request, to account for locating the information and supplying it to you.

We may refuse to give you access to the personal information we hold about you if we reasonably believe that giving you access would pose a serious threat to the life, health or safety of an individual, if giving access would have an unreasonable impact on the privacy of other individuals, or if the request is frivolous or vexatious. Other grounds for refusal to give access may also apply under the Privacy Act.

### **14. Complaints**

If you are not satisfied with how we manage your personal or credit information in accordance with the Privacy Act or Credit Reporting Code, you can register a complaint directly with Judo's Privacy Officer in the first instance.

Judo will follow these steps to address and manage your complaint:

- make a record of your complaint;
- within one business day of receiving a complaint, acknowledge your complaint in writing; and
- within 30 calendar days of receiving a complaint, investigate the complaint and provide a response to you in writing.

If you wish to make a complaint, please contact us on:

**Phone:** **13 JUDO**

**Email:** [privacy@judo.bank](mailto:privacy@judo.bank)

**Mail:** Privacy Officer

PO BOX 636 South Melbourne Vic 3205

**Website:** <https://www.judo.bank/>

If you are not satisfied with how a complaint has been handled, you can lodge a complaint directly with the Office of the Australian Information Commissioner (OAIC):

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Phone:** 1300 363 992



**Fax:** 02 9284 9666  
**Mail:** GPO Box 5218  
Sydney NSW 2001  
**Website:** [www.oaic.gov.au](http://www.oaic.gov.au)

or you can lodge a complaint directly with the Australian Financial Complaints Authority (AFCA), of which Judo Bank is a member, our external dispute resolution scheme:

**Phone:** 1800 931 678  
**Email:** [info@afca.org.au](mailto:info@afca.org.au)  
**Fax:** 03 9613 6399  
**Mail:** GPO Box 3  
Melbourne VIC 3001  
**Website:** [afca.org.au](http://afca.org.au)

[Time limits](#) to make a complaint to AFCA apply.

## 15. Changes to this policy

We may modify or replace this policy at any time. We will publish any modified or replacement policy on our website at [www.judo.bank](http://www.judo.bank). Any changes come into effect upon publication.

By continuing to access or use our products or services after those changes become effective, you agree to the changed policy.

This version of this policy applies from 1<sup>st</sup> June, 2021.

## 16. Further information

For more information about any issue relating to this policy, please contact us at:

**Phone:** 13 JUDO  
**Email:** [privacy@judo.bank](mailto:privacy@judo.bank)  
**Mail:** Privacy Officer  
PO BOX 636 South Melbourne Vic 3205  
**Website:** <https://www.judo.bank/>

For information in relation to privacy in general, you can visit the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).