

Privacy Policy for customers and potential customers

Effective date: 6 November 2025

**People's
Choice**

Banking for life

1. Your right to information privacy

Key points

- Read this Privacy Policy to understand how we manage our customers' and potential customers' personal information. This Privacy Policy applies to all our brands: People First Bank, Heritage Bank and People's Choice Credit Union.
- To understand how we manage personal information in other circumstances, please refer to "Our other Privacy Policies" section below.
- We may change this Privacy Policy as necessary for our business, or as required by law. The latest version will always be available online and through our branches.

Heritage and People's Choice Limited ABN 11 087 651 125 ('we', 'us', 'our') provides banking and financial services under several business names:

- People First Bank
- People's Choice Credit Union
- Heritage Bank

This Privacy Policy sets out how we manage personal information (including your credit-related information) which we collect to provide banking and other financial services. This includes circumstances where you may not have a banking relationship with us, but you have interacted with us or consented to your personal information being given to us. For example:

- You visit our website
- You subscribe to our newsletter
- You no longer hold any products with us, but we are required by law to continue to hold your information.

Our other Privacy Policies

If you have given us personal information in other circumstances, please see our other privacy policies:

Your relationship with us	Privacy Policy
• You applied for a job with us or you are a contractor working with us • You have entered the People First Bank Photographic Awards and other competitions not related to the promotion of our banking and financial services • We sponsored or had other community engagement activities with your charity or community group (this excludes grant activities undertaken by People First Bank Foundation) • You've participated in one of our surveys or research programs	People First Bank Privacy Policy for non-banking activities
You bought a ticket in the People First Community Lottery, or your community group registered to sell People First Community Lottery tickets	People First Community Lottery Privacy policy
You donated to or are a supporter of the People First Bank Foundation, or your charity or community group applied for or received a People First Bank Foundation grant.	People First Bank Foundation Privacy Policy

Changes to this policy

We may update this Privacy Policy from time to time to reflect any changes in the way we handle personal information. For the latest version of this privacy policy, head to our website or visit one of our branches.

2. How we collect your personal information

Key points

- We generally collect your personal information directly from you, through our interactions. This includes when you use our websites, digital applications, or our in-branch Wi-Fi services.
- We may also collect your personal information through other sources. For example, joint account holders and joint borrowers, guarantors for any loans you have with us, and third parties who have authorised you to operate their accounts.
- We may also collect your personal information from marketing agencies, credit reporting bodies and other service providers.

When you give us personal information

We will generally collect your personal information directly from you when you interact with us. This includes when you:

- submit any forms (including applying for membership or a product)
- visit us in a branch
- when you call us or we call you
- give us instructions in relation to your account
- perform a transaction on your account
- use our websites, digital applications or our in-branch Wi-Fi services
- provide us with feedback through surveys and research projects related to your banking relationship with us.

When others may give us your personal information

We also collect your personal information through other sources. These include:

- through our interactions with other individuals who may be your joint account holders or joint borrowers, or who may authorise you to be a third party to their account
- if you apply for a loan with us:
 - your employer, who we may contact to verify your income details
 - credit reporting bodies from which we may obtain your credit history details
- law enforcement and government entities
- marketing agencies, data collection and research organisations
- CCTV surveillance footage

3. What personal information do we collect?

Key points

- We collect customers' and potential customers' personal information that we need to provide our products and services, and to operate our business.
- We may collect a wide range of personal information about you including your identity and contact information, certain Government identifiers, socio-demographic information and credit-related information.
- The types of personal information we collect about you depends on the nature of your relationship with us and the products you apply for.

We only collect personal information that's relevant to our relationship with you and the operation of our business.

The table below gives examples of the types of personal information we may collect about you. We won't necessarily collect all of these types of personal information about you. The extent and nature of personal information we collect about you depends on the accounts and services we provide to you.

We may be required by law to collect some types of personal information. Other types of personal information such as sensitive information and information about your personal circumstances may help us assess whether you need special support because you are a vulnerable person or because you are in hardship.

Types of personal information	Examples of personal information
Identity information & contact details	• Name • Date of birth • Telephone numbers • Email addresses • Mailing and residential address
Government identifier	• Tax File Number (TFN) and country of tax residency • Medicare card, passport, driver's licence, or pension card details • Tax identification number (TIN) and country of tax residency
Credit Information	See Section 6 – Credit Information and Credit Eligibility Information for details
Employment information	• Employment status • Employment history • Income, salary and bonus information
Socio-demographic information	• Marital status • Age • Gender • Number of dependents • Nationality

Types of personal information	Examples of personal information
Sensitive information	• Health information • Race or ethnicity (e.g. if you ask for translation services) • Criminal history and political affiliation
Information about your personal circumstances	• Information about significant life events (including relationship breakdowns and deaths in the family) • Information about family and domestic violence • If you have been impacted by an emergency event or a natural disaster • If you experience unexpected changes to your financial situation (such as losing a job or incarceration) • Details of injury, illness, gambling or addiction
Transaction information	• Credit card transactions • ATM (Automatic Teller Machine) withdrawals • Payee details
Digital information	We collect digital information when you use our online services or access unsecured parts of our website (that is, a public page not requiring you to log on). This includes: • Location information (if enabled on your device) • IP Address • Information about the electronic devices (computers, mobile phones or tablets) you use to access our platforms and how you use them, including details relating to your devices, their operating systems, browsers, other installed applications and settings • The time and date of the visit • Information or documentation that you download • Internet protocol details of the device used to access the site • Data you enter and save on our online calculators • Contents of any emails you send to us (we will only use this content and the email it was received from for the purpose it was sent to us)

Types of personal information	Examples of personal information
Digital information	Our website and mobile device applications use Google Maps features and tools provided by Google. Google's Privacy Policy (see google.com/policies/privacy) applies to your use of such features and tools. Our website also uses cookies. A 'cookie' is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (i.e. pages that you have to provide login details to access) we use cookies for security and personalisation purposes. We use cookies to obtain information about how our website is being used. You may change the settings on your browser to reject cookies, however doing so might prevent you from accessing the secured pages of our website.
Camera surveillance	We use CCTV monitoring at our premises. When you attend one of our premises, we may make a video or audio recording of you.
Publicly available information	• Information you publish on any forums, websites, social media (for instance, if you use social media to make a complaint) • Information available on public registers (for example, from Australian Securities and Investments Commission or Land Registry Services)
Biometric information	We collect behavioural and analytical biometric information which may include things like screen movement and information related to how you use and interact with our online applications and websites. If we collect your physical biometric data, such as your facial image or fingerprint we will only do so after requesting and receiving your explicit consent.

4. Why we collect, hold, use and share your personal information

Key points

- We collect, hold, use and share your personal information so that we can serve you as a customer (or potential customer) and operate our business. In some cases, we may be required by law to collect certain personal information from you.
- Unless you tell us not to, we may use your personal information for marketing purposes.
- You can choose not to share all or some of your personal information, but this may limit how we can help you.

We need your personal information to provide our products and range of services to you. This section sets out our key activities and why we collect your personal information. We also use your personal information for secondary purposes related to the activities outlined below. This includes, for example, audits, law enforcement activities and where we are required to do so by law.

You don't have to give us your personal information. However, if you don't provide us with all or some of your personal information that we request, this may limit how we can help you and what we can discuss with you. In some cases, we may not be able to provide you with our products and services.

Our activities	Why we collect your personal information
Serving you as a customer or potential customer	When serving you as a customer, we may need personal information from you to: • give you information about our products and services that are relevant to you • to make sure it's you • process your application for our products and services. This may include assessing your eligibility for a product • respond to your communications including if you request a service or raise a complaint
Operating our business	This includes activities to: • manage a wide range of security risks including physical security, network controls and data protection • protect you and us from suspicious or fraudulent activities • manage your deposit accounts • manage your loan accounts. This includes taking actions like assigning debts and engaging collection agencies • process transactions on your accounts • manage our prudential requirements, including undertaking securitisation activities

Our activities	Why we collect your personal information
Operating our business	• improve the way we operate. This includes activities for research, training, product and service development, risk assessment, risk modelling, fraud detection and marketing requirements • maintain and develop our business systems • ensure the safety of our staff and customers
Meeting our legal and regulatory obligations	The law requires us to collect and/or verify certain personal information. This includes: • Anti Money Laundering and Counter Terrorism Financing Act 2006 (Cth) • National Consumer Credit Protection Act 2009 (Cth) • State and Territory property laws • Taxation Administration Act 1953 (Cth) and Income Tax Assessment Act 1936 (Cth) • Other countries' taxation laws where we have a legal obligation to do so
Marketing our products and services	We undertake a range of marketing activities, including: • running competitions, promotions and referral projects • sending you information about products or services offered by us or by third parties with whom we have a business relationship • sending customer newsletters and offering you additional customer benefits • sending you updates and important information regarding our brand • sending you information on services and products and tailoring your experience on our website, personalised to your usage and product holding We will not use your personal information for marketing purposes if you ask us not to. Information about how we use cookies is set out under 'Digital Information', in Section 3 – What personal information do we collect?
Survey and Research Projects	We may use personal information we have about you through your banking relationship with us to analyse your response to surveys. This enables us to understand your experiences with us and how we can improve our customer experience, products and services. Any personal information you provide to us that is not relevant to this purpose is de-identified before it is used for any further analysis. If you do not or are unable to provide the information requested in a survey or research project, you will not be able to participate in that survey or research project.

5. Sharing your personal information

Key points

- We share your personal information with a range of third parties who support us in providing our products and services, and operating our business. We may also be required by law to share your personal information with third parties including government agencies, regulators and law enforcement bodies.
- We ensure that our service providers and strategic partners with whom we share your personal information have appropriate data security and protection measures to protect your personal information.
- We share personal information with companies that may hold your data overseas, but we only do so if we are satisfied that the company has adequate data protection arrangements in place. A list of countries to which your personal information may be sent is in the further details below.

We share your personal information with a range of third parties to provide you with our products and services, and to operate our business. However, we only do so if we are satisfied that the third party has adequate data protection arrangements in place to protect your personal information. The third parties with which we share your personal information depends on the nature of your relationship with us and the products you hold or apply for. In some circumstances, these entities may also share your personal information with other entities which support the operations of their business or with which they do business.

For personal information collected for a survey or research project, we will only share it with a third party if it is necessary for the purposes of our research project. For example, we may share the personal information with organisations to whom we outsource functions such as survey data analysis, IT providers, our agents and specialist advisers such as accountants and solicitors.

Here are the types of third parties we may share your personal information with and why.

Types of third parties	Examples of entities we share your personal information with
Our service providers	We rely on a range of service providers to support us in providing products and services to you, and to operate our business. This includes: • companies that provide printing and bulk mail services, facilitators of emails and SMS, statement production providers, market research companies, authorised representatives • technology systems providers and specialists • payment providers and companies involved in the processing of payments (e.g. clearing and settlement facilities, card scheme operators) • our advisers or agents which may include lawyers, mortgage brokers, real estate agents, valuers, auditors, health care providers, financial advisers, insurance companies, executors, administrators, trustees, or attorneys • companies that provide survey and research related services on our behalf • credit reporting bodies, debt collecting agencies, document verification services, your guarantors, or insurers of a security property • lenders' mortgage insurers (if insurance is required because the amount you borrow exceeds a certain percentage of the security property's value) • parties involved in what is known as 'securitisation,' under which we sell a pool of home loans. These third parties include trustees of securitisation arrangements, lenders' mortgage insurers, investors, and their advisers • other financial institutions, merchants, and payment organisations • any investors, agents or advisers, trustees, ratings agencies or businesses assisting us with funding for credit made available to you, or any entity that has an interest in your finance or business • any person considering acquiring an interest in our business or assets • companies who may administer prizes or rewards for competitions If you ask someone to send you money electronically, payment providers and other entities involved in processing the payment may share your name and account match details with the payer as part of the Confirmation of Payee service, unless you are eligible to opt out and have done so.

Types of third parties	Examples of entities we share your personal information with
Strategic partners	From time to time, we may enter into a referral arrangement with other financial services providers including general insurers whose products and services may be of interest to you. We may share your personal information with those providers so they can provide you with their services or products.
Regulatory authorities, law enforcement and other government entities	We may share your personal information with regulatory authorities, law enforcement agencies and other government agencies if required or permitted by law. These include: • Australian Financial Complaints Authority (AFCA), the Office of the Australian Information Commissioner (OAIC) and other relevant external bodies who deal with disputes • Australian and international enforcement bodies such as the Australian Securities and Investments Commission (ASIC), the Australian Taxation Office (ATO), the Australian Transaction Reports and Analysis Centre (AUSTRAC) • Centrelink (also known as Services Australia) • the Courts • Government Health departments, where we are compelled to due to public health orders. In these circumstances, personal information (including sensitive information) may be used or disclosed including tracing individuals, notifying individuals who may have been exposed and advising relevant Government authorities and agencies
Other third parties	We may need to share your personal information with other types of third parties. We will only do so with your consent, or if we are permitted or required to do so by law. These third parties include: • Your current or recent employers where you have applied for a loan and we need to verify your income • Other people associated with accounts you hold with us, such as joint borrowers, joint account holders and guarantors • Signatories and other people you may authorise to operate on your account from time to time

Types of third parties	Examples of entities we share your personal information with
Overseas Recipients	Your personal information may be sent outside Australia where, for example: • You have requested or consented that we send your personal information • Services are provided to us by an overseas contractor with whom we have a contractual arrangement • Where it is necessary to investigate or facilitate a transaction on your behalf We will not send your personal information outside Australia unless we are satisfied that the recipient of the personal information has adequate data protection arrangements in place. Overseas organisations may be required to disclose information we share with them under a foreign law. Where personal information has been disclosed overseas, there is a possibility the recipient may be required to disclose it under a foreign law. Where this occurs, such disclosure is not a breach of the Privacy Act. The countries to which we are likely to disclose your personal information (including credit information and credit eligibility information) are: Countries within the European Union (e.g. Germany, Ireland, the Netherlands, Poland and Romania), India, Malaysia, Philippines, Singapore, United Kingdom and United States of America.

6. Credit information and credit eligibility information

Key points

- This section applies if you apply to be or you are a borrower or guarantor.
- We collect credit information about you to assess and maintain your loan, as well as to operate our business. This includes obtaining a credit check about you from a credit reporting body.
- During the life of your loan, we will give certain information about your loan account, such as your repayment history to credit reporting bodies. This information is included in future reports and may be used by other lenders to assess your credit worthiness.
- The details of the credit reporting bodies we deal with are in the further details below.

Why we collect, hold, use and share your credit information

We collect, hold, use and disclose your credit information and credit eligibility information for a range of activities. The table below sets out our key activities and why we collect your credit information. Details of how we share your credit information are set out in Section 5 – Sharing your personal information.

Our activities	Why we collect your credit information
Serving you as a borrower or guarantor (including potential borrower or guarantor)	This includes activities to: • assess your application for a loan or to be a guarantor for a loan including your ability to make repayments under the loan • helping you manage your loan including identifying if you may be in financial hardship account holders and guarantors
Operating our business	This includes activities to: • manage your loan accounts. This includes taking actions like assigning debts and engaging collection agencies • manage our prudential requirements, including undertaking securitisation activities • share information with credit reporting bodies • share information with insurers, re-insurers and lenders' mortgage insurers
Meeting our legal and regulatory obligations	We may be required by law to undertake certain enquiries and verifications to assess whether a loan is suitable for you before we lend you money (including giving you a credit card) or accept you as a guarantor for a loan. This also applies if you already have a loan or credit card with us and wish to increase the amount you have borrowed or your credit limit.

Our activities	Why we collect your credit information
Meeting our legal and regulatory obligations	There are other laws under which we are required to collect and/or verify certain personal information for further details refer to 'Meeting our legal and regulatory obligations' in Section 4 – Why we collect, hold, use and disclose your personal information.

What credit information and credit eligibility information do we collect?

We collect and hold the following types of credit information and credit eligibility information about you as a borrower or guarantor. This may be during your application, or throughout the life of your loan with us.

Details of other types of personal information we may collect about you as a borrower or guarantor are set out in Section 3 – What personal information do we collect?

Type of credit information	Examples of credit information
Income information	This is information about your sources of income, including: • current and most recent past employers • rental • other investment income
Consumer credit information	This is information about any accounts that you currently have open or may have had in the past, including: • the type of account • the open and close date • credit limit
Repayment history	This includes a history of your repayments, including: • whether you have made payments when due, • if not, when overdue payments have been made.
Financial Hardship Information	This includes information about financial hardship arrangements that you may have with us or elsewhere.
Default information	Details of any defaults or serious credit infringements.
Public information	Public records including: • court judgments • directorship and business details • bankruptcy • debt agreement • personal insolvency information
Other information about credit worthiness	Information including: • credit scores • credit ratings • summaries and evaluations.

Credit reporting bodies

If you apply for a loan or offer to act as a guarantor, we may collect your personal information from a credit reporting body. This information assists us in assessing your eligibility for credit. We use information from credit reporting bodies as well as other credit information to complete our assessment of your eligibility for a loan. If we decline your loan application due to credit eligibility information obtained from a credit reporting body, we will let you know. Please note that an information request made to a credit reporting body may negatively affect your credit score or credit rating as calculated by the credit reporting body.

During the life of your loan, we may share credit information (including financial hardship information) about your loan with credit reporting bodies. Should you fail to meet your payment obligations or commit a serious credit infringement, we may be entitled to disclose this to the credit reporting bodies. Credit reporting bodies include this information in reports to help lenders assess your credit worthiness when you apply for a loan.



What if your identity has been stolen?

If you are a victim of identity fraud or think you are at risk of identity fraud, you can ask credit reporting bodies to put a freeze or a ban on your credit report.

Below are details of the credit reporting bodies we collect information from and share information with. Please note that we may use different credit reporting bodies across our brands. To learn more about how credit reporting bodies handle your information (and to access their credit reporting policies), you can contact the relevant credit reporting body below:

Credit Reporting Body	Website
Equifax	www.equifax.com.au
Experian	www.experian.com.au
Illion (an Experian company)	www.creditcheck.illion.com.au

7. Storing and protecting your personal information

Key points

- We may hold your personal information electronically or in hard copy.
- We only hold your personal information for as long as we need it, or as required by law. Once the information is no longer needed, we will take reasonable steps to destroy or permanently de-identify the information.
- We take a wide range of steps to ensure the security of your personal information. This includes physical and electronic security measures, as well as administrative measures.
- We hold your personal information in safe and secure environments. This includes external environments operated by appropriate third-party suppliers.

How we store your personal information

We store your personal information (including credit information and credit eligibility information) in numerous ways. This includes:

- digital or electronic format (in computer systems or databases including cloud storage)
- hard copy or paper files

Digital files may include audio and visual recordings such as telephone recordings and CCTV footage.

We store these records for as long as we need to operate our business. We may also be required by law to retain certain records for minimum periods of time.

When your personal information is no longer needed, we will take reasonable steps to ensure that it is destroyed or permanently de-identified.

How we protect your personal information

The security of your personal information is important to us, and we take all reasonable precautions to protect it from misuse, interference, loss, unauthorised access, modification, or disclosure. Some of the ways we do this are:

- ensuring confidentiality requirements for employees and contractors
- implementing document storage security policies
- returning documents to you or destroying data when no longer required in a secure manner or by de-identifying
- implementing security measures such as passwords for access to our systems and controlling access to our buildings
- implementing protocols to make sure it's you or an authorised person who is accessing your personal information
- having confidential face-to-face discussions between you and us in a secure environment
- maintaining electronic security systems such as firewalls, virus software, and data encryption on our websites
- taking reasonable steps to ensure that third parties with whom we share personal information or who hold personal information on our behalf have adequate data protection arrangements in place to protect your personal information

8. Accessing and updating your personal information

Key points

- You can ask to access your personal information at any time.
- You can also correct personal information we hold about you by telling us. It's important that you let us know of any changes to your personal information such as your contact details.
- For information about how to contact us, please see Section 9 – We're here to help.

Accessing your personal information

You have the right to access, update or request us to correct your personal information (including your credit information or credit eligibility information) through your digital banking or at any time by asking us through any of the methods listed under Section 9 – We're here to help. You will need to provide us with sufficient identification for us to make sure it's you, before we can process your request. We will respond to your request for access within a reasonable timeframe. Where possible, we will do this immediately. In some cases, we may charge a fee to access your information. We will let you know before charging you any fees. You should refer to your account terms and conditions for full details of the costs involved in accessing your personal information.

In limited circumstances, we can deny you access to your personal information. Unless we're prohibited from doing so, we will tell you our reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can request a review of our decision to refuse access. Please see Section 9 – We're here to help.

Changes to your personal information

It's important that you let us know if your personal information changes, particularly your contact details (e.g. postal address, email address or telephone numbers).

You can ask us to correct any personal information (including credit information and credit eligibility information) we hold about you at any time.

If your request relates to credit related information provided by a credit reporting body, please refer to Section 6 – Credit Information and Credit Eligibility Information for information on how to contact the relevant credit reporting body.

9. We're here to help

Key points

- Please contact us if you have any questions or concerns about your privacy, you wish to access or update your personal information, or to make a complaint.
- You can raise any privacy complaints directly with us, and we will manage it in accordance with our Complaint Management Promise.
- If you're unhappy with our handling of your complaint, you can refer your complaint to the Australian Financial Complaints Authority (AFCA) or the Office of the Australian Information Commissioner (OAIC).

Please contact us if you have any questions or concerns about your privacy including if you wish to access or update your personal information.

You can also contact us if you believe that the privacy or security of your personal information has been compromised, is not adequately protected, or you think we have failed to comply with our obligations under the Privacy Act or the Privacy (Credit Reporting) Code.

Get in touch

People's Choice Credit Union / People First Bank	Heritage Bank
13 11 82	13 14 22
Visit peopleschoice.com.au/contact-us and complete an Online Enquiry Form	feedback@heritage.com.au info@heritage.com.au
Visit any of our branches	Visit any of our branches
GPO Box 1942 Adelaide SA 5001	The Privacy Officer Heritage Bank PO Box 190 Toowoomba QLD 4350
Peopleschoice.com.au Peoplefirstbank.com.au	Heritage.com.au

You can also direct message us on our official Facebook, Instagram, LinkedIn or any other social media channels.

Making a complaint

You can make a complaint about the way we handle your privacy by contacting us through any of the below channels.

Your complaint will be managed in accordance with our Complaint Management Promise. To find out more, head to our website or chat with us.

The Complaint Management Promise includes information about accessibility options, as well as what you can expect from us in managing your complaint.

People's Choice Credit Union/ People First Bank	Heritage Bank
1800 961 687	1800 797 799
complaints@peopleschoice. com.au	complaints@heritage.com.au
Visit any of our branches	Visit any of our branches
People's Choice Credit Union GPO Box 1942 Adelaide SA 5001	Heritage Bank PO Box 190 Toowoomba QLD 4350

What if I'm not satisfied?

If you are not satisfied with our response, you may request a review by the Australian Financial Complaints Authority (AFCA). AFCA provides free and independent financial services complaint resolution:

Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001
Ph: 1800 931 678
Website: www.afca.org.au
Email: info@afca.org.au

You may also obtain further information about privacy or refer a privacy complaint by contacting the Office of the Australian Information Commissioner:

The Office of the Australian Information Commissioner
GPO Box 5288, Sydney NSW 2001
Ph: 1300 363 992
Website: www.oaic.gov.au
Email: enquiries@oaic.gov.au