

## KEYCORP PRIVACY POLICY

Keycorp Limited and its associated companies (Keycorp) are committed to protecting your privacy in accordance with the National Privacy Principles ("NPPs") set out in the amendments to the Privacy Act 1988. The amendments apply specifically to the protection of personal information except for employee records which are exempt from the provisions. However, as a provider of secure electronic transactions, Keycorp understands and respects the importance of protecting the privacy of your personal information, whether you are an individual customer, an individual involved with a customer organisation, or a Keycorp employee or contractor.

This Privacy Policy explains how Keycorp will protect your privacy, including:

- how we collect personal information;
- the categories of personal information that we may hold;
- the importance of consent in the use or disclosure of personal information;
- our storage and security arrangements for personal information;
- how we handle requests for access to personal information; and
- how we resolve privacy complaints.

### **What type of personal information does Keycorp collect?**

The type of information that Keycorp collects varies according to the circumstances, but in most cases will include your name and business contact details (organisation, business title, telephone number, e-mail address, etc). If you are conducting a business or financial transaction with Keycorp or using a system managed by Keycorp on behalf of another organisation such as a bank or a merchant, we may collect additional information to enable the transaction to be completed. This may include, for example, your credit card number and your bank account details and we may need to pass these on to another party to the transaction.

We collect personal information about our customers, our own and perhaps our customers' staff and other individuals for legitimate business purposes including:

- providing secure electronic transactions;
- business development and exploring business opportunities with potential customers;
- contract and relationship management;
- engagement and management of suppliers;
- administration of our internal business processes, such as travel management, cost reporting, internal technology support, obtaining security clearances etc;
- recruitment of employees and contractors;
- personnel performance management and professional development;
- other purposes required by law.

In certain circumstances, we may be required to collect sensitive information such as health details for recruitment or insurance purposes and, for instance, criminal record information for the purpose of obtaining a security clearance. We will only collect sensitive information where you have given your express or implied consent, or the collection is required by law or in other circumstances permitted by NPP 10.

### **Collecting your personal information**

Normally, Keycorp would collect personal information directly from you and information may be collected over the telephone, via the internet, by the submission of an application or an electronic form, or by visiting our website.

However due to the nature of our business, there may be instances where we need to collect personal information about you from a third party. For example, if you are a potential employee of the company or a supplier/subcontractor that we are considering engaging, we may seek to confirm your qualifications or experience with a referee.

## Cookies

When conducting business over the internet, Keycorp uses session cookies for parts of certain transactions. These are deleted at the completion of each session and are not otherwise recorded or stored.

## Using or disclosing your personal information

If you are a Keycorp customer we may collect your personal information in order to provide you with a particular product or service. If you are an employee or contractor, collection occurs for the purpose of your employment or engagement as well as to comply with our legal obligations to you (for example paying your salary, or making superannuation and taxation contributions on your behalf).

In some circumstances, we may use or disclose your personal information for related or secondary purposes, in which case we will comply with NPP 2. Secondary purposes might include, for example:

- carrying out our business with you (for example, in completing a secure financial transaction on your behalf, we may need to pass on your details to a bank or a merchant).
- internal business administration; and
- legal and regulatory compliance.

If we need to use your personal information for a secondary purpose (that is, a different purpose from the one for which we first collected it from you), we must get your consent unless

- getting your consent is impractical, or
- it is reasonable for us to assume that you would have expected us to use your personal information for the secondary purpose when you gave it to us, or
- we can reasonably conclude from your actions, or from your failure to act, that you have consented.

You may give us your consent verbally or in writing. You should also be aware that, if you do not consent, we may be unable to provide you with a particular product or service.

There may be circumstances where Keycorp subcontracts or outsources a Keycorp function or activity. For example, where we may subcontract product maintenance services and a user problem requires an on-site fix, Keycorp must provide its nominated subcontractor with the relevant user's name and business contact details so that on-site repairs can be done. We may also outsource a non-core business function, such as personnel training and development administration or payroll processing, to a third party service provider. In these situations, the subcontractor or third party service provider may only use the personal information supplied for the specific purpose for which Keycorp supplies it.

Keycorp does not sell or disclose personal information to third parties for the purpose of allowing them to direct market their products or services to you. Except where required by our contract with you or your organisation or by law, Keycorp will not disclose personal information to third parties except with your implied or express consent.

## Accuracy

Keycorp takes reasonable steps to ensure that any personal information held about you is accurate. We will do our best to ensure that your personal information is accurate, complete and up-to-date whenever we use or collect it. If you find that any personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately so that we can correct it. Our contact details are at the end of this document.

To enable us to verify your identity and entitlement to the relevant personal information, please send us a completed Keycorp Privacy – Request for Access or Correction form (See Appendix 1 for the Keycorp Privacy Access or Correction Policy and Appendix 2 for the Keycorp Privacy Access or Correction Form). There will be no charge for lodging a request for correction, although we reserve the right to levy a reasonable charge for the administrative effort involved in complying with the request.

## Storage and Security

Keycorp protects any personal information that it holds from misuse or loss and from unauthorised access, modification and disclosure. Your personal information may be stored in hardcopy documents, electronically or in databases, software or computer systems. Keycorp maintains physical security (such as locks and keys and security monitoring systems) over paper and electronic data records containing personal information. We also maintain computer and network security, for example firewalls, encryption, multi-level password controls and other security protection over our computer systems. We do our best to ensure that only authorised personnel will have access to your personal information.

Also, Keycorp maintains comprehensive internal security policies and procedures. These may be specific to your organisation or covered by our general internal security arrangements.

Keycorp will take reasonable steps to destroy or permanently de-identify your personal information when it is no longer needed for the purpose for which it was collected or required by law. In many cases, our contract with you will govern the length of time that records are to be kept.

## Access and Correction

On request Keycorp will give you access to any personal information we may hold about you provided that such access may lawfully be given to you under NPP 6.1. Where this is not the case, we will explain the basis for our decision. Under certain circumstances, it may be possible to use intermediaries to allow you sufficient access to meet your needs.

Should you establish that the information we hold about you is not accurate, complete and up to date, we will take reasonable steps to correct it.

To enable Keycorp to verify your identity and entitlement to the relevant personal information, please send us a completed Keycorp Privacy – Access or Correction form (See Appendix 1 for the Keycorp Privacy Access or Correction Policy and to Appendix 2 for the Keycorp Privacy Access or Correction Form). There will be no charge for lodging a request for correction, although we reserve the right to levy a reasonable charge for the administrative effort involved in complying with the request.

## Unique Identifiers

To comply with NPP 7, Keycorp will not adopt or use as its own any government-issued identifiers (such as tax file numbers, Medicare numbers or drivers licence numbers) unless required or authorised by law to do so. For example, tax file numbers are required for the purpose of complying with our taxation obligations, but we will not use your tax file number to identify you or the information we hold about you.

## Anonymity

Wherever lawful and practicable, Keycorp will take reasonable steps to ensure that you have the option of remaining anonymous in your dealings with us. However, we expect that there will be instances in the provision of secure financial services and our other contacts with you where anonymity will be impractical and may prevent us from providing services to you.

## Transfer of personal information overseas

Because of the nature of the internet and the global financial structure, it is inevitable that some of the personal information that we collect will be transferred to overseas databases in the course of particular transactions. For example, credit card companies maintain their client records in centralised databases in other countries and all credit card transaction details must be transferred to these databases. We will only permit the transfer of personal information overseas in accordance with NPP 9, where:

- Keycorp has obtained your express or implied consent;
- Keycorp reasonably believes that the overseas recipient is subject to comparable privacy laws;

- the transfer is necessary for Keycorp to perform its contract with you or a contract where you receive the benefit of the contracted services ; or
- the overseas recipient is employed or engaged by an offshore part of the Keycorp organisation.

**If you have a complaint**

You may raise a privacy complaint if you have an issue or problem related to Keycorp's handling, use, disclosure or disposal of your personal information. We will investigate all privacy complaints brought to our attention and we will try to resolve the complaint to the satisfaction of all parties.

A privacy complaint may be raised by sending us a completed Keycorp Privacy Complaint form, with all necessary supporting documentation, at the address provided on the form. (Refer to Appendix B for the Keycorp Complaints Handling Process and to Appendix C for a copy of a Keycorp Privacy Complaint form.)

**Need more information?**

If you have a query on how your personal information is collected or used, or any other query relating to Keycorp's Privacy Policy and procedures, please contact the Keycorp Privacy Officer on:

Telephone: 02 9415 2900

Facsimile: 02 9414 5460

Email: [privacy@keycorp.net](mailto:privacy@keycorp.net)

Postal Address:

Privacy Officer

Keycorp Limited

PO Box 199

CHATSWOOD 2067