



ING DIRECT Privacy Policy

Issued August 2009

Privacy Policy

This Privacy Policy applies to the ING Bank (Australia) Limited (ABN 24 000 893 292) (trading as "ING DIRECT"). The terms "we", "us" or "our" means ING DIRECT.

ING DIRECT is committed to ensuring the confidentiality and security of your personal information. We are bound by the Privacy Act and the National Privacy Principles (NPPs) regulated by the Federal Privacy Commissioner to guide us in our responsible handling of personal information

1. WHAT IS PERSONAL INFORMATION?

The Privacy Act and the NPPs apply to the collection, use and disclosure of an individual's personal information by private sector organisations. Under the Privacy Act, personal information is broadly defined. In simple terms it means any information related to an individual which is held in a record by an organisation such as ING DIRECT. It includes credit information obtained from an individual or a third party and, for individuals applying for our home loans or guarantors, includes anything about credit worthiness, standing, history and capacity.

In certain circumstances, we may also collect personal information about you which is sensitive. Sensitive information includes information about your health, religious or philosophical beliefs, membership of professional or trade associations, or a criminal record. Unless the collection of sensitive information is required or permitted by or under law, we will obtain your consent to its collection.

The Privacy Act and the NPPs do not apply to the handling of information related to companies or to businesses.

2. HOW AND WHY WE COLLECT YOUR PERSONAL INFORMATION

There are a number of reasons why ING DIRECT may collect your personal information. One reason is to provide you with a particular financial product or service. A second reason is to provide you with further information about other ING DIRECT products and services - this is further outlined in Section 8, "Receiving information about our financial products and services". Thirdly, ING DIRECT has an obligation to identify customers under the Anti-Money Laundering and Counter-Terrorism Financing Act, 2006 (AML/CTF Act).

The collection of information can occur via our Contact Centre, when you complete an application form for a product or in response to a request for additional information. We collect such information as it is necessary for us to assess your application for a particular product and to manage and administer the product. If you do not provide us with the requested information we may not be able to provide you with ING DIRECT products or services.

We seek your consent to our handling of your personal information via our application forms, our administration processes and other methods by which we capture information.

2.1 Customer surveys

ING DIRECT may also collect your personal information through customer surveys or questionnaires for the purpose of obtaining your feedback on our products and services and providing further information to you about ING DIRECT or ING products or services. In this case, the completion of the questionnaire is entirely your choice and we will inform you of the purpose of the survey or questionnaire. The collection of such information will only occur with your consent. Survey information assists us in understanding your needs for financial products and services and in the development of future products and services.

2.2 Use of the Internet (including cookies)

Many of our customers choose to use the ING DIRECT website to receive information about ING DIRECT products and services. Customers may also access their account or undertake certain transactions through the ING DIRECT website. All customers will receive a Client Number and Access Code to access their account and personal information online. Your Client Number and Access Code are unique identifiers for you and it is a condition of your account to keep your Access Code and any other codes confidential and secure at all times and that you do not disclose them to any other person. The complete terms and conditions relating to the use of the ING DIRECT Interactive Service are outlined in the relevant terms and conditions of your account.

If you believe or suspect that your codes may have been disclosed to another person or you want to change your Access Code, please contact us immediately by calling one of our Direct Associates, available 24 hours a day, 7 days a week on 133 464.

Use of Internet Cookies

ING DIRECT, like most major websites, use cookies to record aggregated statistics on the number and source of visitors to our website. Cookies are files that web servers place on a user's computer and are designed to store basic information such as how you found our website. We never store any personal customer information in cookies.

If you have any concerns about this technology and do not wish to accept cookies, you can set the browser on your PC to not accept them or to prompt you every time they are about to be stored on your PC. The choice is yours.

3. HOW WE USE YOUR PERSONAL INFORMATION

The primary reason that we collect, use or disclose your personal information is to assess your application, including the verification of your identity (an AML/CTF Act obligation) and then administer and maintain your financial product or provide a financial service. For example, ING DIRECT maintains records of the products each client holds and provides account statements to each client.

ING DIRECT maintains the confidentiality and security of your personal information by restricting access to those staff and service providers required to provide management and administrative services.

A range of security measures are in place and are designed to prevent the misuse, unauthorised access, modification or disclosure of your personal information.

We may use your information to provide you with further information about other ING DIRECT and ING products and services.

4. DISCLOSURE OF YOUR PERSONAL INFORMATION TO OTHER PARTIES

It may be necessary for ING DIRECT to disclose your personal information to certain third parties in order to assist us in providing, managing and administering the products you have with us. These include:

- Other Financial Institutions
- Other financial institutions, such as banks, credit unions, building societies and payment services such as VISA, in order to set up and manage your account and manage banking transactions.
- Other Organisations
- Other ING Group entities and third parties, such as:
- Other ING Group entities in order to service other products you may have within the Group and portfolio analysis;
- Other ING Group entities located overseas for account administration and security purposes;

- ING Group entities for marketing purposes;
- Mortgage intermediaries, your financial adviser, your power of attorney, or your appointed solicitor;
- Organisations undertaking reviews of the accuracy and completeness of our information;
- Our solicitors, valuers and insurers for loan products;
- Organisations providing mailing services, document storage services, marketing bureau services (eg, telemarketing) and printing our standard documents and correspondence;
- Organisations maintaining our information technology systems and providing information technology services;
- Credit reporting or information verification agencies in order to obtain and provide details of credit history or status or to verify other information about you including your identity;
- Organisations providing analysis and research regarding our products, services and customer relationships;
- Organisations undertaking identity verification services to verify information about you including your identity;
- Organisations involved in securitisation arrangements. These organisations include trustees of those arrangements, investors and their advisers; and
- Organisations who perform services or functions on our behalf.

We only disclose your personal information to such organisations for the provision of the specified services. Organisations performing services on our behalf are required to comply with our confidentiality requirements and privacy law.

Personal information will only be disclosed to other third parties if we are permitted, authorised or required to do so by law; you have authorised us to do so, or it is necessary to assist with law enforcement.

4.1 Financial Advisers and Mortgage Intermediaries

Many of our customers have sought the advice of a financial adviser or mortgage intermediary to select their financial products or services. The term “mortgage intermediary” also includes mortgage brokers and mortgage managers.

In this case, your initial application form may be completed in consultation with your financial adviser or mortgage intermediary. Information relating to your financial product will be provided to your financial adviser or mortgage intermediary where you authorise them to receive such information on your behalf. This sort of information may include account statements and other correspondence relating to your financial product.

Your application or instructions may include an authorisation permitting your financial adviser or mortgage intermediary to receive your personal information and to review your account through a website link.

You may appoint or change your financial adviser or mortgage intermediary, or change their authority by contacting ING DIRECT directly.

5. HOW TO ACCESS YOUR PERSONAL INFORMATION

You may request access to information that we hold about you and your ING DIRECT financial products or services by contacting ING DIRECT on 133 464 or writing to the ING DIRECT Privacy Officer at GPO Box 4094, Sydney NSW 2001. Requests for access to your personal information may only be made by you.

We may seek reimbursement for providing access to this information to recover any expenses incurred in retrieving and collating the requested information. Please refer to your product documentation or contact ING DIRECT for details of any reimbursement costs. We may request that you specify the information you wish to access, to help us quickly identify and retrieve that information for you. ING DIRECT will advise you at the time of your access request how long it will take to provide the information. This will usually be in less than 21 days.

We may exercise our right to deny access to particular information in certain situations, for example where access may involve commercially sensitive decision processes (eg, criteria for loan approvals) or where legal proceedings have commenced. If we deny you access to your personal information, we will explain the reason it has been denied.

6. PROTECTION AND QUALITY OF YOUR PERSONAL INFORMATION

We are committed to protecting your personal information from misuse and loss and from unauthorised access, modification or disclosure. We limit access to those staff and service providers who manage your financial product, provide you with a financial service, or supply you with further information on ING DIRECT products or services. We have in place a range of security measures designed to prevent unauthorised access or disclosure of your personal information.

ING DIRECT relies on the correctness of the information that you supply to us. Please assist ING DIRECT by contacting us if any of your personal information is incorrect or requires updating.

7. HOW LONG IS YOUR PERSONAL INFORMATION KEPT?

Your personal information is kept as long as the information is required to manage your financial product, provide you with a financial service, or to deal with your enquiry. It is generally kept for a further period of at least seven years.

8. RECEIVING INFORMATION ABOUT OUR FINANCIAL PRODUCTS AND SERVICES

ING DIRECT does not sell or rent its customer information to any unrelated third parties for the purpose of those third parties marketing their products or services to you.

ING DIRECT may supply customer information to marketing bureau services (e.g telemarketing) or other ING Group entities for the sole purpose of those companies contacting you about ING DIRECT or ING products and services. ING DIRECT may also send you information about products and services provided by ING DIRECT or ING Group entities directly. You may notify the marketing bureau service of your decision not to receive any further contact at the time of their call or you may notify us directly.

Alternatively, you may place your phone number on the Do Not Call Register established under the Do Not Call Register Act, 2006. You may contact the Register on its website <https://www.donotcall.gov.au/> or by calling 1300 792 958.

9. TAX FILE NUMBERS

ING DIRECT is required to request the collection of your Tax File Number (TFN) under certain legislation. The handling of TFNs is also regulated under the Privacy Act through Guidelines issued by the Federal Privacy Commissioner. The continued confidentiality and security of your TFN will be maintained in accordance with these Tax File Number Guidelines.

10. RECEIPT OF FURTHER ING GROUP INFORMATION

We, or other ING Group entities, may provide you with further information about ING products and services.

If you have provided an e-mail address to us, we may contact you using that e-mail address, including to provide you with information about ING DIRECT or our products. You may elect not to receive further information about us, our products, or ING and its products by contacting us online, calling or writing to us.

11. CHANGES TO THIS POLICY

ING DIRECT continually strives to improve the standard of the service we provide to you, so from time to time we may update this policy.

If you wish to obtain further copies of this policy please contact ING DIRECT or download the policy from www.ingdirect.com.au.

12. HOW TO CONTACT ING DIRECT ABOUT PRIVACY

If you have any further questions about privacy at ING DIRECT, please contact us:

- By calling us on: 133 464
- By e-mailing us: customer.service@ingdirect.com.au
- By writing to :
ING Privacy Officer
GPO Box 4094
Sydney NSW 2001

13. WHAT TO DO IF YOU HAVE A PRIVACY COMPLAINT

ING DIRECT is committed to resolving your privacy complaint as quickly as possible and has procedures in place to help resolve any problems or complaints efficiently. Our aim is to assist you by reaching a satisfactory solution as soon as possible.

If you have a complaint or a concern about privacy at ING DIRECT, please contact us straightaway by calling 133 464 or +61 2 9028 4077 (when you're overseas).

If you need to put your concern or complaint in writing, please address it to:

ING DIRECT – Complaints Resolution
GPO Box 2682
Sydney NSW 2001

In the unlikely event that your complaint cannot be resolved directly with ING DIRECT you can seek assistance from the Financial Ombudsman Service (FOS). You can contact them by:

- calling 1300 780 808;
- going to www.fos.org.au;
- faxing 03 9613 6399; or
- writing to:
Ombudsman Service
GPO Box 3
Melbourne VIC 3001.