

# Westpac Institutional Banking (WIB) Privacy Statement (United Kingdom, Germany and Singapore customers)

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# Westpac Institutional Banking (WIB) Privacy Statement (United Kingdom, Germany and Singapore customers)

Protecting our customers' privacy is fundamental to the way we do business. We are committed to earning and maintaining your trust by carefully and respectfully managing your personal data.

This Privacy Statement provides important information about how we collect and handle your personal data, including the purposes for which we collect and use your data and the types of organisations we share it with (some of which are located outside of the country in which we collect it). It also explains how you can access and correct the personal data we hold about you, and how you can make a complaint about our handling of your personal data.

## How does this Privacy Statement apply where you are engaging with us in relation to a business, corporate and institutional customer?

Where you engage with us in relation to products and services for our business, corporate or institutional customers (for example as a representative, director, corporate officer, signatory, beneficiary or shareholder of one of our customers) this Privacy Statement is relevant to you where we process your personal data, such as our collection and handling of your personal data. For example, this Privacy Statement applies where we collect your personal data to verify your identity or collect your signature as a signatory on a corporate account.

## 1 About this Privacy Statement.

This Privacy Statement includes information about our collection and handling of your personal data for our products and services; explaining how our businesses handle and manage personal data.

Depending on your circumstances, including the product or service applied for, or that is obtained from us, some or all of this Privacy Statement may be relevant to you. On occasion, we will need to provide you with additional information specific to a collection of personal data, in which case we will provide you with a supplementary privacy notice. Please read this Statement, and any supplementary privacy notice provided to you, and contact us if you have any questions.

You can download a copy of our full Privacy Statement, view the full Privacy Statement online at [westpac.com.au/privacy/privacy-statement/](https://westpac.com.au/privacy/privacy-statement/) or contact us for a free printed copy using the contact details set out below.

In this Statement, **“we”, “us” and “our” means Westpac Banking Corporation, Westpac Europe Limited, Westpac Europe GmbH** and individual companies who are part of the Westpac Group, which are data controllers (companies who determine the ways in which your personal data is processed and why) and are responsible for this Statement.

Westpac Group is made up of Westpac Banking Corporation and its related bodies corporate includes:

- Westpac Banking Corporation
- Bank of Melbourne, BankSA, St.George Bank and Xylo – each a part of Westpac Banking Corporation
- Altitude Rewards Pty Limited
- Asgard Capital Management Limited
- BT Funds Management Limited
- BT Funds Management No. 2 Limited
- BT Portfolio Services Limited
- BT (Queensland) Pty Limited
- BT Securities Limited
- Capital Finance Australia Limited
- GIS Private Nominees Pty Limited
- Qvalent Pty Limited
- RAMS Financial Group Pty Limited
- Sallmoor Pty Limited
- St.George Finance Limited
- St.George Motor Finance Limited
- Value Nominees Pty Limited
- Westpac Administration Pty Limited
- Westpac Administration 2 Pty Limited
- Westpac Administration 3 Pty Limited

- Westpac Administration 4 Pty Limited
- Westpac Capital Markets LLC
- Westpac Debt Securities Pty Limited

## Australia

Where you are interacting with the Westpac Group in Australia, the privacy statement for Australia is available [here](#) and may be applicable to you, along with any other applicable privacy notices provided to you.

## New Zealand

Where you are interacting with the Westpac Group in New Zealand, the privacy policy for New Zealand is available [here](#) and may be applicable to you, along with any other applicable privacy notices provided to you.

## European Union (EU)

Where you are interacting with the Westpac Group in the EU, you will find additional information on the processing of your personal data below.

# Important information about our collection of your information

## 2 What is personal data?

Personal data means any information relating to an identified or identifiable individual. What personal data do we collect and hold about you?

The personal data that we collect and hold about you will depend on:

- the products and services we are offering or providing;
- the nature of your interactions with us.

In the table below we list the types of personal data we collect and hold about you, with some examples of what this may include:

Type of personal data	Examples of what this may include
Personal and contact details	Your name, date of birth, gender, signature, mailing and residential address details, telephone numbers, email addresses, citizenship and/or residency details, foreign tax residency status, employment details.
Government issued identification (copies) and identifiers	Your health card number, passport details, driver's licence number and copies of government identification documents.
Photographs, video or audio recordings	Call recordings and security camera recordings when you contact or visit our offices. Call recordings when you call our treasury, institutional sales and trading and corporate sales business representatives.
Special or sensitive categories	Information relating to your citizenship, residency status and biometric data (to verify your identity and authorise transactions). In addition, we may collect sensitive information about your racial or ethnic origin (for example, when we collect your passport details). We may collect information from third party providers of screening services which may include details relating to criminal convictions or your criminal record.
Transactional data	Records of transactions, for example where you are an account holder.
Digital (or electronic information)	The date and time of your visits to our webpages, geographical information, information about the device used to visit our website (including your tablet or mobile device) such as device IDs and IP addresses, the date and time of accessing online banking and other digital services, and geolocation where you provide permission in your device settings.  We may also collect information from third party websites, applications or platforms containing our interactive content or that interface with our own websites and applications including financial information research services.

Type of personal data	Examples of what this may include
Publicly available information	<p>Searches of corporate banned and disqualified persons register, insolvency registers and bankruptcy registers, government websites, company registers and civil registers, regulatory registers and websites, stock exchange registers and websites, shareholder registers, financial information research services, online search engines, social media websites, your company website, product prospectuses, annual reports and news media websites.</p> <p>We may collect information about you from Westpac pages on social media platforms if you publicly comment but we will never ask you to supply personal data publicly over any social media platform on which we have a presence and use, such as Facebook or Twitter.</p>

### 3 How and when do we collect your personal data?

We collect personal data directly from you, whether in person, on the phone or electronically via our websites, our online platform(s) and email or indirectly from other sources, including publicly available sources (see 'Collecting your personal data from others' Section below).

For example, we collect your personal data from you when you interact with us to:

- register interest in, enquire about or are involved in the application for one of our products and/or services or programs;
- provide us with feedback or make a complaint;
- use online services or use our mobile or tablet applications;
- visit our websites; or
- talk to us (including by us recording certain of your telephone calls with us), email us, do business with us or otherwise interact with us.

We may also collect your personal data if we infer or generate information about you based on your transactions, preferences, and behaviours (including through the use of data analytics).

### 4 Collecting your personal data from others.

From time to time we may collect personal data about you from others. Refer to Section 12 for the type of personal data we may collect from each of the entities listed below. For example, we may collect your information from:

- our business, corporate and institutional customers, where you are a representative, director, shareholder, corporate officer or signatory, beneficiary or shareholder of one of our customers, or otherwise give instructions on behalf of a customer;
- other Westpac Group companies;
- publicly available sources of information public insolvency registers and registers of banned and disqualified persons, government websites, company registers and civil registers, regulatory registers and websites, stock exchange registers and websites, shareholder registers, financial information research services, online search engines, social media websites, your company website, product prospectuses, annual reports and news media websites for the purpose of reviewing applications for our products and services;
- your representatives (including your legal adviser, financial adviser, executor, administrator, guardian, trustee, or those holding your power of attorney) for the purposes of assessing an application for a product with us, managing a product or for reviewing an investment account;
- our representatives authorised by us who introduce or facilitate products and services on our behalf;
- other organisations we jointly provide products or services with or have an arrangement with to provide our products or services;
- service providers engaged by us or another member of the Westpac Group to provide financial, administrative or other services to the Westpac Group, including companies or individuals who provide services to us such as financial crime (including fraud) information and reporting (including to confirm your identity and/or to assess if you are eligible for the relevant product or service) and data analytics;
- participants in payment and settlement systems and other parties who are involved with the processing of transactions such as transaction settlement and clearing agents and services; and
- law enforcement, dispute resolution, statutory and regulatory bodies and industry complaints resolution bodies.

## 5 Why we collect your personal data

We collect and hold your personal data, as permitted by law, to help us run our business and serve you better, including to:

Purpose	Examples of why we collect and hold your personal data
<b>Provide our products and services and serve you as a representative of a customer</b>	<ul style="list-style-type: none"><li>• provide and manage products, services and programs to our business corporate and institutional customers;</li><li>• answer your questions and resolve your complaints;</li><li>• assess an application (including eligibility) for a product or service or in relation to participation in any of our programs or initiatives; and</li><li>• understand your interests and preferences so we can tailor our digital content and products and services for you.</li></ul>
<b>Security, verification and prevention of fraud/ criminal activity</b>	<ul style="list-style-type: none"><li>• verify your identity;</li><li>• verify aspects of your financial situation in connection with assessing an application of a business or corporate customer; and</li><li>• prevent, detect and investigate suspicious, fraudulent, criminal or other activity that may cause you, us or others harm, including in relation to our products and services.</li></ul>
<b>Legal and regulatory compliance</b>	<ul style="list-style-type: none"><li>• comply with our legislative and regulatory requirements (both in Australia and in other countries); and</li><li>• share information with law enforcement, regulators and government agencies, including foreign government agencies.</li></ul>

## 6 Additional reasons why we hold, use and disclose your personal data.

In addition to the specific reasons we provide for collecting your personal data in Section 5 'Why is your personal data being collected', we also hold, use and disclose your personal data for additional purposes set out below.

Purpose	Examples of why we use your personal data
<b>Improve our products and services, enhance customer relationships and manage risks</b>	to prepare your personal data for data analytics processes, conduct data analytics and generate insights from that data analysis for the benefit of Westpac, to improve the delivery and development of our products, services and programs, enhance our customer relationships and effectively manage risk and adherence to our policies and procedures.
<b>Assist our Business Partners and other third parties with our and their products and services</b>	to prepare your personal data for data analytics processes, conduct data analytics and generate insights from that data analysis for the benefit of third parties (noting that the outputs of these activities will not be disclosed to third parties unless they have been subject to a de-identification process or the disclosure is otherwise agreed with you or permitted by applicable laws).

**If you are in the UK or EEA, there is additional information on the purpose of processing your personal data from Section 21 onwards.**

## 7 You do not have to provide us with your personal data.

You do not have to provide us with personal data. If you don't, we may not be able to process an application made by a business, corporate or institutional customer for a product or service, assist with your enquiries, provide all of the features available for a product or service, or respond to any complaint you make to us.

## 8 Who we disclose your personal data to and why.

The table below explains who we may disclose your personal data to:

*For most products and services*

Entity description	We may share your information with:
<b>Westpac Group entities</b>	other companies within the Westpac Group to manage products and services including offering new products and services and risk management.
<b>Westpac's professional advisers</b>	our professional advisers such as our financial advisers, auditors, insurers, and legal advisers for the purposes of obtaining their professional services (in the case of our legal advisers, these services will include assessing our legal obligations and defending any legal claims or potential claims).
<b>Associated entities, service providers and agents that help us run our business</b>	<p>other organisations that help us run our business, including:</p> <ul style="list-style-type: none"> <li>• businesses that we partner with to provide products or services or which we have arrangements with to provide products and services;</li> <li>• our agents, contractors and service providers such as mailing houses, insolvency practitioners, quote providers, vendors and systems associated with transaction reporting and cloud storage providers for the purposes of: <ul style="list-style-type: none"> <li>– administering products;</li> <li>– varying a loan or other credit products; and</li> <li>– helping us with our marketing activities;</li> </ul> </li> <li>• to help us develop insights, conduct surveys and data analysis to improve the delivery of products and services, enhance our customer relationships, provide hosting services and effectively manage risk and regulatory obligations;</li> <li>• screening and vetting services who help us verify your identity;</li> <li>• our representatives authorised by us who sell or arrange products and services for you on our behalf; and</li> <li>• organisations that support us to identify, investigate or prevent fraud or other misconduct.</li> </ul>
<b>Dispute resolution and regulatory authorities</b>	<ul style="list-style-type: none"> <li>• external dispute resolution schemes and complaints bodies that assist to resolve any complaints that have been made to them; and</li> <li>• regulatory bodies, government agencies such as tax authorities (including the Australian Tax Office, His Majesty's Revenue and Customs (HMRC), Bundesfinanzministerium (the Federal Ministry of Finance, Germany) and law enforcement bodies in any jurisdiction where required or authorised by law to do so.</li> </ul>
<b>Investors and prospective purchasers of Westpac businesses</b>	companies or other persons who purchase or invest in, or may purchase or invest in, a part or all of our business or assets (including their advisers and representatives).
<b>Financial services organisations, payment system operators and other institutions that facilitate transactions and payment services</b>	<ul style="list-style-type: none"> <li>• other financial services organisations, including other banks, stockbrokers, custodians, fund and investment managers, and service providers who process your transactions and provide other payments and settlement services;</li> <li>• payment and settlement systems operators for the purpose of managing transactions through those payment and settlement systems (for example, settlement agents, trustee service providers, custodians and clearing houses);</li> <li>• market operators and providers of clearing and settlement platforms, stock exchanges and quote providers;</li> <li>• participants in payment and settlement systems and other parties who are involved with the processing of transactions.</li> </ul>

## 9 Do we use or disclose your personal data for direct marketing?

We may use your personal data to offer you products and services we believe may be of interest and value to you. The products and services offered may be provided by us or by one of our third-party partners. We may offer you products and services by various means, including by telephone, email, online chat functions or other electronic means and in person meetings.

## Particular circumstances that may apply to you

### 10 If we ask for, or collect, a personal tax identification number or an Australian Tax File Number.

This section applies (*in addition* to the rest of this Privacy Statement) if we ask for, or collect, your personal tax identification number, which could include your Australian tax file number (**TFN**) if applicable to you. Please see the Section 21 'Accessing and correcting your personal data and/or credit information' and Section 22 'Resolving your privacy complaints' to find out how to access your personal tax identification number or TFN, correct your details, or complain about our handling of your personal tax identification number or TFN or other personal data.

#### **Why we collect your TFN.**

We are authorised to collect the personal tax identification numbers or TFNs of:

- account holders, where the account you open earns interest, and investors under the *Income Tax Assessment Act 1936* (Cth) as applicable; and
- superannuation fund members, under the *Superannuation Industry (Supervision) Act 1993* (Cth) as applicable.

We only collect your personal tax identification number or TFN for purposes required or authorised by law, including for the purpose of reporting information to the relevant tax authorities in a relevant jurisdiction, including the Australian Taxation Office (**ATO**). If you are a superannuation fund member and you provide your permission for us to do so, we may also use your TFN to search for funds held by you with other superannuation or retirement savings providers for the purpose of consolidating your super.

#### **Who we share your personal tax identification number or TFN with.**

We are required to report details of interest or dividend income earned, withholding tax deducted and personal tax identification numbers or TFNs and exemptions recorded in connection with the accounts and investments you hold with us to the ATO.

In addition, if you are a superannuation fund member and you provide your TFN, we may provide your TFN to another super plan or retirement savings provider if your benefits are transferred, unless you request in writing that your TFN not be disclosed to anyone else.

Otherwise, your personal tax identification number or TFN will be kept confidential and only shared where permitted by law.

### 11 If you give us personal data about someone else.

Before you provide another person's personal data to us (for example, a person who is a director, shareholder or employee of a business, corporate or institutional customer) you must make them aware:

- that you will be doing this;
- of the contents of this Privacy Statement and any other relevant privacy notices; and
- that we will collect, use and share their personal data in accordance with this Privacy Statement and any other privacy notices we give you.

Where you provide us with another person's sensitive or special category information (or in Singapore, any personal data about another person) you must first obtain their consent to sharing it with us and their consent to us collecting, using and disclosing their sensitive information in accordance with this Privacy Statement and any other relevant privacy notices.



## 12 Use of Cookies.

Cookies are small pieces of information stored on your device hard drive or in memory. We use cookies to collect personal data directly from you when you interact with us through our public and secured websites, mobile or tablet applications. We collect limited personal data about you via cookies for the following purposes:

Purpose	Description
<b>Security</b>	Cookies can help secure a user's experience by simplifying login, maintaining session integrity or validating content entered into form fields. We do this to: <ul style="list-style-type: none"><li>effectively manage our business risks.</li></ul>
<b>Personalise and improve your customer experience</b>	Cookies can be used to remember user preferences or understand traffic or webpages. We do this to: <ul style="list-style-type: none"><li>help us to remember you the next time you visit our websites;</li><li>help us identify products and services that may be of interest and value to you;</li><li>tailor digital content to your likely interests; and</li><li>improve the pages or sites visited by making them faster or more efficient.</li></ul>
<b>Measurement and analysis</b>	Cookies can be used to collect data (including location) about users who interact with our public and secured websites, mobile or tablet applications. This data is stored and analysed by us. We do this to measure effectiveness of our marketing, including via third parties, to improve our services to you.
<b>Marketing and communication</b>	Cookies can be used to launch segment targeted marketing campaigns, promote new services or websites and send segment or targeted messages to you. We do this to: <ul style="list-style-type: none"><li>determine which products or services may be of interest and value to you and to tell you about them;</li><li>advise you of new services or website or app features; and</li><li>send relevant messages to you.</li></ul>

**If you are in the UK or EEA, there is additional information on the purpose of processing your personal data in Section 21 below.**

## 13 How we protect your personal data.

We take a range of physical, electronic and other security measures, to protect the security, confidentiality and integrity of your personal data (including your sensitive and credit-related information). For example:

- access to our information systems is controlled through identity and access management controls;
- employees and our authorised representatives are bound by internal information security policies and are required to keep personal data secure;
- all employees and our authorised representatives are required to complete training about privacy and information security;
- we monitor and review our compliance with internal policies; and
- we regularly assess our security measures against industry best practices.

## 14 Transferring your personal data overseas.

### ***For most products and services.***

We may share or transfer your personal data outside of the country where it was collected to some of the types of recipients and for the purposes noted above, including:

- organisations operating overseas with whom we partner to provide goods and services to you and our contracted service providers operating overseas, which are likely to be located in Australia, New Zealand, United States, Canada, India, the Philippines, UK, Malaysia and Brazil;
- Westpac Group companies located in Australia, Germany, Hong Kong, Singapore, New Zealand, UK, United States, and Papua New Guinea to help us deliver or support the provision of our products and services to you; and
- for international transactions, such as currency exchanges, we will disclose your information to the corresponding international party and their financial services organisations in order to process the transaction. The countries where we disclose your information will depend on the details of the transaction you ask us to carry out.

Where required by law, we will obtain your consent for the transfer of personal data and we will take steps to ensure that your personal data continues to be protected as required under applicable law.

**For further details on where we transfer, store and process your personal data, refer to Section 24.**

## 15 Accessing and correcting your personal data.

You can request access to the personal data that we hold about you in accordance with local laws. You can also ask for corrections to be made to it in accordance with those laws. To do so, please contact us using the contact details provided below.

We will seek to verify your identity and authority before we allow access, or make changes, to your personal data.

There is no fee for requesting corrections to your personal data or for us to make those corrections. In some circumstances, we may, in accordance with applicable laws, charge you a reasonable amount for providing you with access to your personal data to cover the costs of locating the information, copying it and supplying it to you. If this applies, we will inform you of the fee in writing before processing your request.

If you are in Singapore, we will respond to your request as soon as reasonably possible. We endeavor to respond to requests within thirty (30) days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing of the time by which we will be able to respond to your request.

We are not required to provide you with access to your personal data in certain limited circumstances, for example where an exemption applies under applicable law.

If we refuse to give you access to or to correct your personal data, we will give you a notice explaining our reasons (except to the extent it would be unreasonable or unlawful for us to do so) and provide you with information on how you can complain about our refusal.

**If you are in the UK or EEA, please see Section 26 below for specific rights under applicable laws.**

## 16 Retention of personal data.

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your personal data or remove how the data can be associated with you as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected and is no longer necessary for legal or business purposes. If you are in the UK / EEA, please see Section 25 for more information on retention of your personal data.

## 17 Resolving your privacy complaints and concerns.

If you have a question or complaint about how your personal data is being handled by us, our affiliates or service providers, please contact us by using the contact details provided below.

### **Delivering on our service promise.**

We are constantly striving to provide the best possible service, and we will do our best to efficiently and fairly resolve any concern you have.

### **Our commitment to you.**

If you are ever unhappy about something we have done – or perhaps not done – please give us the opportunity to put things right.

Our aim is to resolve your complaint within five (5) business days, and where possible we will resolve your complaint on the spot. If we need additional time to get back to you, we will let you know. Should we be unable to resolve your concern at your first point of contact, we will then refer the complaint to our dedicated Customer Managers in our Customer Solutions team.

Our Customer Solutions Customer Managers are here to find a solution for you and will ensure that you're regularly updated about the progress we are making to resolve your complaint.

**If you are in the UK or EU, you may lodge a complaint with the relevant data protection authority, listed in Section 19 below.**

## 18 Contact us.

### **Westpac Banking Corporation London Branch or Westpac Europe GmbH.**

- calling; + 44 (0) 20 7621 7000;
- visit or mail: Camomile Court, 23 Camomile Street, London EC3A 7LL, United Kingdom.

### **Westpac Banking Corporation Singapore Branch.**

- calling; +65 6530 9898
- visiting our branch: Westpac Banking Corporation, 12 Marina View, #27-00, Asia Square Tower 2, Singapore 018961
- emailing: [singapore.enquiries@westpac.com.au](mailto:singapore.enquiries@westpac.com.au)

### **Westpac Banking Corporation in Australia.**

**Westpac** customers can contact us:

- over the phone on 1300 130 467 or 132 032 – our call centres are open 8am – 8pm, 7 days a week except Public Holidays from anywhere in Australia. If you are overseas, please call +61 2 9155 7700, 24 hours a day, 7 days a week;
- in person – at any branch;
- online at [westpac.com.au](http://westpac.com.au) – using our secure [feedback form](#) to provide feedback, share your suggestions, provide a complaint or compliment;
- by email – [westpaccustomersolutions@westpac.com.au](mailto:westpaccustomersolutions@westpac.com.au); or
- by writing to us – at Reply Paid 5265, Sydney NSW 2001.

### **For all Westpac Group customers – Privacy Officer**

- Our Privacy Officer can be contacted in relation to privacy concerns by writing to Reply Paid 5265, Sydney NSW 2001. For further information go to our website and search 'Feedback and Complaints'.

## 19 If you are still unhappy.

If you are not satisfied with our response to, or handling of, your complaint, you can contact the applicable data protection authority for your jurisdiction.

### For our UK Customers:

Financial Ombudsman Service

Phone: 0800 023 4567

Email: [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)

Online: [financial-ombudsman.org.uk/consumers/how-to-complain](https://financial-ombudsman.org.uk/consumers/how-to-complain)

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

Phone: 0303 123 113

LiveChat: [ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/](https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/)

Online: [ico.org.uk/make-a-complaint/](https://ico.org.uk/make-a-complaint/)

### For our EEA customers:

FIN-NET

Online: [finance.ec.europa.eu/consumer-finance-and-payments/retail-financial-services/financial-dispute-resolution-network-fin-net\\_en](https://finance.ec.europa.eu/consumer-finance-and-payments/retail-financial-services/financial-dispute-resolution-network-fin-net_en)

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit

Postfach 3163

65021 Wiesbaden

Phone: +49 611 1408-0

Email: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)

Online <https://datenschutz.hessen.de/service/beschwerde-uebermitteln>

### For our customers located in Singapore:

Personal Data Protection Commission (PDPC)

10 Pasir Panjang Road

#03-01 Mapletree Business City

Singapore 117438

Phone: +65 6377 3131

Fax: +65 6577 3888

Online: [www.pdpc.gov.sg/Complaints-and-Reviews](https://www.pdpc.gov.sg/Complaints-and-Reviews)

## 20 Changes to this Privacy Statement.

We may update this Privacy Statement from time to time and communicate those changes as appropriate. An up-to-date version of this Privacy Statement is available at any time at [westpac.com.au/privacy/privacy-statement/](https://westpac.com.au/privacy/privacy-statement/)

This Privacy Statement was published on August 2023.

# Additional information for individuals located in the United Kingdom (UK) and European Economic Area (EEA)

## 21 Why is your personal data being collected and processed?

We collect and hold your personal data to help us run our business and serve you better, including to:

Purpose for collecting your personal data	Our grounds for processing your personal data	Examples of our legitimate interests
<b>To verify your identity</b>	<ul style="list-style-type: none"> <li>To comply with EU and/or UK law</li> <li>Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To comply with our legal obligations outside the UK and EU</li> </ul>
<b>To check eligibility for a product or service</b>	<ul style="list-style-type: none"> <li>To comply with EU and/or UK law</li> <li>Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To effectively manage our business risks</li> <li>To comply with our legal obligations outside the UK and EU (for example, anti-money laundering regulations)</li> </ul>
<b>To provide our requested products and services</b>	<ul style="list-style-type: none"> <li>To comply with EU and/or UK law</li> <li>To fulfil our contract with our business, corporate or institutional customers</li> <li>Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To ensure you are satisfied with the products and services we deliver on your request</li> <li>To improve the products and services we offer</li> <li>To develop new products and services</li> <li>To understand your needs as a consumer and which further products and services could benefit you</li> <li>To effectively manage our business risks</li> <li>To obtain insurance</li> </ul>
<b>To improve the delivery of products and services to you</b>	<ul style="list-style-type: none"> <li>Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To comply with our legal obligations outside the UK and EU</li> <li>To contact you to ask for your consent</li> <li>To ensure our records of your information are accurate</li> <li>To understand your needs as a consumer and which further products and services could benefit you</li> <li>To determine the types of customers which would be interested in new or existing products or services</li> </ul>
<b>To improve our relationship with you</b>	<ul style="list-style-type: none"> <li>To comply with EU and/or UK law</li> <li>Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To comply with our legal obligations outside the UK and EU</li> <li>To contact you to ask for your consent</li> <li>To ensure our records of your information are accurate</li> </ul>
<b>To prevent and report on financial crime</b>	<ul style="list-style-type: none"> <li>To comply with EU and/or UK law</li> <li>Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To comply with our legal obligations outside the UK and EU</li> </ul>

Purpose for collecting your personal data	Our grounds for processing your personal data	Examples of our legitimate interests
To communicate directly with you in relation to products and services we offer	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• You have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>• To contact you to ask for your consent</li> <li>• To inform you of products and services that may be of interest to you</li> </ul>
To communicate with you on behalf of our partners and third parties	<ul style="list-style-type: none"> <li>• You have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
To communicate with you via our partners or third party organisations in relation to products and services we offer	<ul style="list-style-type: none"> <li>• You have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
To share information with companies within Westpac Group	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• You have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>• To provide requested products and services</li> </ul>

## 22 Why and on what grounds is your information being collected via cookies?

Our purpose for using of cookies, outlined in Section 21 above, is based on the grounds set out in the table below.

Purpose	Description	
<b>Security</b>	<ul style="list-style-type: none"> <li>• To comply with EU and/or UK law</li> <li>• To provide you with our services</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with our legal obligations outside the UK and EU</li> <li>• To effectively manage our business risks</li> <li>• To carry out other essential security checks to offer you a secure and reliable online service</li> </ul>
<b>Personalise and improve your customer experience</b>	<ul style="list-style-type: none"> <li>• To comply with EU and/or UK law</li> <li>• You have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>• To help us to remember you the next time you visit our websites</li> <li>• To help us identify products and services that may be of interest and value to you</li> <li>• To tailor digital content to your likely interest</li> </ul>
<b>Measurement and analysis</b>	<ul style="list-style-type: none"> <li>• To comply with EU and/or UK law</li> <li>• You have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with our legal obligations outside the UK and EU</li> <li>• To effectively manage our business risks</li> <li>• To measure effectiveness of our marketing, including via third parties, in order to improve our services to you</li> </ul>
<b>Marketing</b>	<ul style="list-style-type: none"> <li>• You have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>• To determine which products or services may be of interest and value to and to tell you about them</li> </ul>
<b>Communication</b>	<ul style="list-style-type: none"> <li>• To comply with EU and/or UK law</li> <li>• To communicate with you</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with our legal obligations outside the UK and EU</li> <li>• To effectively manage our business risks</li> <li>• To send relevant messages to you</li> </ul>

## 23 When do we use your personal data to make automated decisions?

To provide an efficient and effective customer experience, in some circumstances we may make a decision based on information that we have about you that does not involve any human intervention. This is known as an automated decision. In most circumstances, we make automated decisions about a business or customer entity, rather than you as an individual.

For example, we may use automated decisions for the following reasons:

Type of automated decision	Reason for automated decision making
<b>Detect and prevent fraud</b>	To prevent and report on financial crime. If financial crime is detected or we notice suspicious activity on an account we may stop activity on the account or contact you for further information.
<b>Detect and prevent money laundering</b>	Based on transactional behaviours, we screen payments made to entities that are or may be: <ul style="list-style-type: none"><li>• subject to legal sanctions;</li><li>• deemed to be at risk of money laundering; or</li><li>• made for illegal purposes.</li></ul> We may identify such activities and block these transactions from proceeding until such time we have investigated the issue.
<b>Marketing</b>	Based on the type of products and services with us and your online activity, we tailor marketing messages to you.

You have rights over automated decisions we make about you using your personal data. Where you are subject to an automated decision you can:

- ask that we do not make our decision based on automated processing alone;
- express your point of view; and
- object to an automated decision, and ask that a person reviews it, although your rights may be limited in circumstances where our automated decisions do not have a significant impact on you.

If you would like more information about your rights regarding automated decisions, please contact us using the contact details set out in this Policy see 'Contact Us' section.

## 24 Where do we transfer, store and process your personal data.

We will transfer your personal data outside of the UK and/or EEA:

- When you instruct us to do so;
- To comply with the law; and
- To work with our companies within the Westpac Group, partners and third parties who help us deliver our products and services.

Most of the personal data we hold about you will be stored electronically in secure data centres which are located in Australia and the United Kingdom and are owned by either the Westpac Group or contracted service providers (including cloud storage providers).

Where we disclose your personal data to a recipient located outside of the UK and/or EEA, these recipients may include the following:

- Westpac Group companies located in Australia, Singapore, New Zealand, United States, Fiji and Papua New Guinea;
- our contracted service providers operating in Australia, New Zealand, Canada, United States, India, the Philippines, UK, Malaysia, Brazil and China;
- organisations with whom we partner to provide goods and services and who are likely to be located outside of the UK or EEA, including, for example, in Australia and the United States; and
- for international transactions, such as currency exchanges, where we consider it necessary we may disclose your personal data to the corresponding international party in order to process the transaction. The countries we disclose your personal data to will depend on the details of the transaction you ask us to carry out.

Where we disclose and store your personal data outside of the UK and/or EEA, we will require it to be protected to an equivalent or higher standard than GDPR. In order to do this, we will:

- complete a transfer risk assessment;
- enter into standard contractual clauses with the recipient of your personal data outside of the UK and/or EEA in accordance with Art. 46(2) GDPR. For transfers outside of the UK a copy of the international data transfer agreement and addendum to the European Commission's standard contractual clauses is available at the following link: [ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance). For transfers outside the EEA, the standard contractual clauses are available at the following link: [commission.europa.eu/publications/standard-contractual-clauses-international-transfers\\_en](https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en); and
- ensure that your personal data is transferred to recipients in jurisdictions that the UK government and/or European Commission has determined to offer adequate protection for your personal data. A list of countries for which the European Commission has issued a so-called adequacy decision according to Art. 45 GDPR is available at the following link: [ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

## 25 How long do we keep your personal data?

We will keep your personal data for as long as the customer the personal data is associated with is a customer of the Westpac Group. We also generally retain your personal data for at least seven years after the customer stops being a customer. This is in order to comply with our legal obligations and so that we can respond to any questions or complaints regarding our interactions with you or the customer.

We may also need to keep your personal data for a longer period, where required for legal, regulatory or other reasons. We will continue to safeguard your personal data for as long as we hold it.

If we no longer need to use your personal data for the purposes set out in this policy, we will take reasonable steps to destroy or permanently alter your personal data so that your identity cannot, by any reasonable means, be revealed from the data that we hold about you.

## 26 What are your rights?

You have the following rights with respect to the personal data we hold about you:

- Where we rely on your consent to process your personal data, you have a right to withdraw such consent at any time. If you withdraw your consent, we will, where required by law, stop the processing activities relevant to your consent. Please note that the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- You can ask us for more information on how we have balanced legitimate interests and privacy and further can object to us using your personal data where we are relying on our legitimate interests to do so. However, in those circumstances we may have the opportunity to challenge your objection, which we would do in communication with you and in accordance with our legal obligations. For example, we may process your personal data if, and to the extent we can demonstrate compelling legitimate interests for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. You can also object to us using your personal data for the purposes of direct marketing. In such case, we will no longer process your personal data for direct marketing purposes.
- You can request confirmation of whether we hold your personal data, and where we do, access to the personal data we hold about you (for example, by receiving a copy of it).
- You can request details about where we obtained your personal data from.
- You can ask us to return the personal data which you gave to us in a structured, commonly used and electronic (machine-readable) format, to allow you to pass it on to someone else. Where technically feasible, you have also the right to have your personal data transmitted directly from us to another controller.
- You can ask for corrections to be made to any inaccurate or incomplete personal data.
- You may ask us to stop or to restrict our processing of your personal data if, for example, the accuracy of your personal data is contested by you, or if our processing is unlawful and you oppose the erasure of your personal data and request the restriction.
- You can ask us to erase or remove your personal data if, for example, they are no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed or if your personal data have been unlawfully processed.



- You can lodge a complaint with us or the relevant data protection authority, in particular in the EU Member State of your habitual residence, place of work or place of the alleged infringement. For data processing operations relating to the UK, you can lodge a complaint with the Information Commissioner's Office using their contact details set out in this statement.

We will communicate any requests to correct, erase or restrict the use of your personal data to a third party that we have disclosed your personal data.

If you have any questions about these rights, or you would like to exercise any of them, please contact us (see 'Contact Us' section above). We will endeavour to provide the information that you have requested within one month of your request and we will provide you with reasons if we are unable to meet this timeframe.

You will not generally be charged a fee. However, a reasonable fee may only be charged where your request is manifestly unfounded or excessive.

There may be legal reasons that exempt us from complying with your request. If this is relevant to you, we will discuss the reason.





# We're here to help

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📍 Visit us in branch

## Accessibility support.

At any time, you can inform us how you would prefer to be contacted. If you are deaf and/or find it hard hearing or speaking with people who use a phone, you can reach us through the National Relay Service (NRS). To use the NRS, you can register by scanning the QR Code or visiting [infrastructure.gov.au/national-relay-service](https://infrastructure.gov.au/national-relay-service)



Visit [westpac.com.au/web-accessibility](https://westpac.com.au/web-accessibility) for further information on our accessible products and services for people with disability.

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