

WEBSITE PRIVACY STATEMENT AND PRIVACY POLICY

WEBSITE PRIVACY STATEMENT

This Website Privacy Statement applies to this website, which is operated on our behalf by a service provider under the domain name "www.smartypig.com.au" ("the SmartyPig website"). References to "we" "us" or "our" in this Website Privacy Statement mean Australia and New Zealand Banking Group Limited (ANZ) and its related bodies corporate.

We understand and appreciate that you, as a SmartyPig website visitor, are concerned about your privacy and we are committed to protecting your privacy.

This Privacy Statement explains how your personal information will be treated by the service provider as you access and interact with this website and the measures that are taken by the service provider in relation to your personal information.

As the SmartyPig website develops and as technology evolves, we will continue to strive to provide you with better and more customised services and with a more effective website. We encourage you to review the Website Privacy Statement periodically because it may change from time to time.

Information Collection

Personal information that is collected, such as your name, address, financial information, tax file number, email address and date of birth is safeguarded and made secure. The security and integrity of personal information is protected through procedures and technology designed for this purpose. For example:

- maintaining policies and procedures covering the proper physical security of workplaces and records.
- ensuring physical, electronic, and procedural safeguards are in place regarding the protection of customer information.
- requiring independent contractors and outside companies to adhere to strict privacy standards.
- using technological means (such as backup files, virus detection and eradication software, firewalls, and other computer software and hardware) to protect against unauthorised access or alterations to personal information.

Use of Personal Information That is Collected

Certain areas and features of the SmartyPig website are available to you without registration or the need to provide personal information. However, there are times when personal information is collected and is listed below:

- In order to setup a SmartyPig User Profile and SmartyPig Account and benefit from the full functionality of the SmartyPig website, you are required to provide personal information including your name, residential address, telephone number, e-mail address, tax file number, gender and date of birth. This information is used to verify your identity and communicate with you regarding the services requested and other account related activities. Once registered you may choose to open a SmartyPig Savings Goal and fund that Savings Goal with a personal funding source. In doing so, you will provide personal information including BSB and account numbers.
- In order to contribute funds to a SmartyPig Users Public Savings Goal / to purchase a SmartyPig Gift Card, you are required to provide personal information including your name, billing address, credit card information, phone number, and email address. This information is used to process your order.

Profile Information

Once a SmartyPig User, you may provide additional information about your transaction and savings account(s), including what you are saving for, the savings category, if this is a public or private savings goal, how much you wish to save, how much you have saved to date and when you wish to meet your SmartyPig Savings Goal.

Public Accounts

In order to invite others to contribute to your savings goals, you must designate a SmartyPig Savings Goal as being "public." By doing so, you can then send e-mails to family members and friends inviting them to contribute to your public savings goal, or family and friends can locate your public savings goal by searching for your goal using your e-mail address. The names and e-mail addresses of people whom you invite will be used only to send your invitation and reminders. SmartyPig Users can control the amount of information that is displayed on their public savings goal-landing page, but it will not include more than the User's profile image, first name, last name, description of what they are saving for, the total goal amount, the current balance of the SmartyPig Savings Goal, the percent needed to reach the Goal and SmartyPig "friends." All information that you enter or upload about your contacts will be covered by the same terms of this Website Privacy Statement.

Cookies & Log Files

The SmartyPig website uses cookies and Web log files to track site usage. Due to the communications standards on the Internet, when you visit the SmartyPig website, the URL of the site from which you came is automatically received by the service provider, as is the site to which you are going when you leave the SmartyPig website. Also received is the Internet Protocol (IP) address of your computer (or the proxy server you use to access the World Wide Web), your computer operating system and type of Web browser you are using, as well as the name of your Internet Service Provider (ISP). This information is used to analyse overall trends to improve the SmartyPig experience and the service to you. The link between your IP address and your personal information is never shared with third-parties without your permission, unless required by law. Log files are not tied to personal information. Cookies are tied to personal information in order to perform authentication into the website.

Google Analytics and Omniture is utilised, which are third-party tracking services, which uses cookies to track non-personal information about visitors to the SmartyPig website in the aggregate to capture usage and volume statistics. Business partners of the service provider (e.g., Google Analytics, Omniture) may use cookies on the SmartyPig website. The service provider has no access to or control over these cookies. This Privacy Statement covers the use of cookies by the service provider only and does not cover the use of cookies by any third-party.

Information About Your Friends

In order to invite others to your "friends" list, you will initiate a request from the SmartyPig website that they be added as a friend to your account. This information will be used to send your one-time invitation. Your friend can then accept or deny the request. The names and e-mail addresses of people that you invite will be used only to send your invitation and will not be stored.

Testimonials

Permission is received to post testimonials prior to posting.

Blog

To post a comment, a SmartyPig User must include their name and email address. If you use a bulletin board, blog, or chat room on the SmartyPig website, you should be aware that any personal information you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We nor the provider are not responsible for the personal information you choose to submit in these forums.

Communications

You will receive communications through e-mail and notices posted on the SmartyPig website. Please be aware that you will always receive certain e-mails related to the proper function and activity of your account.

Customised Content

Information you provide at registration or in your Profile section may also be used to customise your experience on the SmartyPig website.

Security

The security of your personal information is important to us. When you enter personal information during registration, information is encrypted using secure socket layer technology (SSL). Generally accepted industry standards are followed to protect the personal information that is submitted by you, both during transmission and once it is received. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure and there is no guarantee of absolute security.

Communications Between Users

Registered SmartyPig Users are able to send automated e-mail notifications to their family members and friends. Automated e-mails you send to a family member or a friend will come from support@smartypig.com.au.

The e-mail will include the following statement:

"The following e-mail was sent to you on behalf of John Doe at <johndoe@example.com>"

Accessing and Changing Your Account Information

You can review the personal information you provided and make any desired changes to the information, or to the settings for your SmartyPig User Profile, at any time by logging onto the SmartyPig website and editing the information on your Profile page.

Links to Other Sites

This website contains links to other sites that are not owned or controlled by us or the service provider. Please be aware that we nor the service provider are responsible for the privacy practices of such other sites. This privacy statement applies only to information collected on the SmartyPig website

Acceptance and Changes Privacy Statement

You acknowledge and accept that your use of the SmartyPig website indicates your acceptance of the Website Privacy Statement.

This is the current Website Privacy Statement. It replaces any other Website Privacy Statement for the SmartyPig website published on the website to date. We may at any time vary the Website Privacy Statement by publishing the varied Website Privacy Statement on the SmartyPig website. You accept that by doing this, we have provided you with sufficient notice of the variation.

PRIVACY POLICY

When you deal with us, we are likely to collect and use some information about you. We explain in this Privacy Policy when and how we may collect and use your information. References to “we” “us” or “our” in this privacy policy mean Australia and New Zealand Banking Group Limited (ANZ) and its related bodies corporate.

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we do business.

As a banking and financial services organisation, we are committed to handling personal information confidentially. We treat very seriously the ongoing trust you have in us to protect your personal information.

We have systems and procedures in place to protect your privacy whenever we collect, store, use or disclose your personal information. You can request details about the information we hold about you and you have a right to ask us to correct this information.

How we collect your personal information

We collect most personal information directly from you. For example, your personal information will be collected when you fill in an application form, deal with us over the telephone or visit our web site.

The type of personal information we collect may include your name, residential address, telephone number, e-mail address, tax file number, gender and date of birth.

There may be occasions when we need to source personal information about you from a third party.

How we use your personal information

We will tell you the purposes for which we intend to use your personal information. We only collect personal information about you that is necessary to perform our functions and activities. If you do not provide this information, we may not be able to deal with you, or provide you with a product or service.

- We may use personal information for several purposes. We may collect your personal information:
- to assist in providing information about a product or service;
- to consider your request for a product or service;
- to enable us to provide a product or service;
- to tell you about other products and services that may be of interest to you;

- to assist in arrangements with other organisations (such as loyalty partners) in relation to the promotion and provision of a product or service;
- to perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, and market or customer satisfaction research);
- to prevent or investigate any fraud or crime (or a suspected fraud or crime); and
- as required by relevant laws, regulations, Codes and external payment systems.

We may disclose personal information to third parties when we contract out some of our functions and activities. For example, we may provide names and addresses to a mailing house to mail account statements to you and other customers. In these situations, we prohibit third parties from using your personal information except for the specific purpose for which we supply it.

Do we use your tax file number or other government identifier?

We do not use your tax file number (TFN), pension number, Medicare number or any other government agency identifier as your account, policy or application number. We only use and disclose these numbers for the purposes required by law, such as disclosing your TFN to the Australian Taxation Office. You may use a government identifier for example, a pension number or Medicare number, to prove your identity when you deal with us.

What about sensitive information?

We will not collect, use or disclose sensitive information about you unless it is necessary to provide you with a product or service and we have your consent or, unless we are legally required to collect, use or disclose that information.

Sensitive information, as defined by law, is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information. We will always explain the purpose for collecting sensitive information.

Your consent is important

Personal information is usually used or disclosed only after obtaining your consent. Your consent can be express or implied. Your express consent can be verbal or written. You imply consent when we can reasonably conclude that you have given consent by some action you take, or when you decide not to take action.

If you do not give us consent to certain uses of personal information we may not be able to deal with you, or provide you with a particular product or service.

The circumstances where we may use or disclose personal information without your consent are very limited. They include where we are required by law, for the investigation of an offence or for court proceedings.

Disclosing to third parties

Subject to any general duties of confidentiality towards our customers and subject to the Privacy Act, we may need to disclose your personal information to:

- your referee(s);
- credit reporting or debt collecting agencies;
- an organisation that is in an arrangement or alliance with us for the purpose of promoting or using their respective products and services (and any agents used by that organisation in administering such an arrangement or alliance);
- any service provider we engage to carry out our functions and activities, including SmartyPig LLC;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- other parties we are authorised or required by law to disclose information to;
- other financial institutions (such as banks);
- participants in the payments system (including payment organisations and merchants) and other financial institutions (such as banks);
- any person who introduces you to us;
- your authorised agents or your executor, administrator or legal representative.

Marketing and privacy

Serving customers well is fundamental to our business. As part of this service we may use personal information we have collected to identify a product or service that may benefit you. We may contact you from time to time to let you know about new or existing products or services.

You can contact us at any time on 1800 267 808 if you do not want to receive marketing information from us. We will process these instructions as soon as practicable.

We keep your personal information up-to-date

If we have accurate information about you, it enables us to provide you with the best possible service. We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing the information.

We will correct personal information

If you learn that current personal information we hold about you is inaccurate, incomplete or out-of-date, you should contact us. We will promptly update any

personal information that is inaccurate, incomplete or out-of-date. You also have the right to request that a statement be attached to your personal information if we disagree with your request to correct the information.

You can request details about your personal information

Subject to some exceptions, you can find out what personal information we hold about you.

How to request details

You should contact us if you wish to find out about the personal information we hold about you. We will need to verify your identity before giving you access.

Depending on the complexity of your request, we may charge a fee for processing the request. In a limited number of circumstances, we may not be able to tell you what personal information is held about you including where:

- it will threaten the privacy of other individuals;
- the information relates to anticipated legal proceedings;
- the information would reveal our commercially sensitive decision making process; or
- the law prevents us from disclosing the information.
- If we are unable to tell you what personal information is held about you, we will give you the reasons why and attempt to find alternative means to enable you to access your information.

Need more information?

If you have a query relating to our Privacy Policy, call us on 1800 267 808.