

# Privacy Policy for non-banking activities

Effective date: 5 May 2026



## 1. Your right to information privacy

Heritage and People's Choice Limited ABN 11 087 651 125 ('we', 'us', 'our') provides or distributes a wide range of banking and financial services. We operate under the following business names:

- People First Bank
- Heritage Bank

We are also a controlling entity of:

- People First Foundation Limited as trustee for People First Bank Foundation ABN 79 297 317 699 (**People First Bank Foundation**)
- People's Choice Community Foundation Ltd ACN 154 717 987 trading as People First Community Lottery (**People First Community Lottery**)

### When this Policy applies

This Privacy Policy sets out how we manage personal information in relation to activities that are not directly related to our banking and financial services including promoting those services. This includes:

- recruitment;
- engaging contractors and entering into contracts;
- administering the People First Bank Photographic Awards and other competitions not related to our banking and financial services including the promotion of those products and services;
- providing sponsorships and undertaking community engagement activities (this excludes grant activities undertaken by People First Bank Foundation); and
- surveys and research projects that are not directly related to your banking relationship with us.

This Privacy Policy also applies to People First Bank Foundation in relation to any recruitment activities they may undertake.

This Privacy Policy applies to how we and People First Bank Foundation manage current and former employees' personal information except when directly related to their employment relationship with us.

### Our other Privacy Policies

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

Your relationship with us	Privacy Policy
You are a customer or potential customer for our banking services, including if you have visited our website or subscribed to our newsletter.	People First Bank Privacy Policy for customers and potential customers
You bought a ticket in the People First Community Lottery, or your community group registered to sell People First Community Lottery tickets.	People First Community Lottery Privacy Policy
You donated to or are a supporter of the People First Bank Foundation, or your charity or community group applied for or received a People First Bank Foundation grant.	People First Bank Foundation Privacy Policy

### Changes to this Policy

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

## 2. How do we collect and hold your personal information?

We will generally collect your personal information directly from you. This may be through your interactions with us, including when you:

- submit any forms (including applying for a job);
- communicate with us whether via email, phone or in person;
- enter into a contract with us;
- provide us with feedback through surveys and research projects;
- attend our functions, events or meetings; and
- CCTV Surveillance.

Depending on the nature of your relationship with us, we may collect your personal information through third parties.

Types of activity	Examples of third parties
Recruitment and contracting	<ul style="list-style-type: none"><li>• Recruitment agencies who approach us on your behalf.</li><li>• Third party websites and platforms (e.g. Seek, LinkedIn) through which you may submit your details.</li><li>• Your employer or recent employers who may provide us with references or conduct history details.</li><li>• Service providers who provide background including criminal history, bankruptcy and professional history checks on our behalf.</li></ul>
Survey and research projects	Third party providers who facilitate survey and research projects on our behalf.
Running the People First Bank Photographic Awards	Third party platforms which may facilitate the management of the photographic awards.
Community engagement and sponsorships	If you hold a position of responsibility at an organisation with which we enter into a community or sponsorship arrangement, then we may obtain your detail from another person on behalf of that organisation.

## 3. What personal information do we collect?

We only ask you for personal information that is relevant to our relationship with you. This is set out in more detail in Section 4 – Why we collect, hold, use and share your personal information.

Depending on the nature of your relationship with us, we may collect the following types of personal information. You don't necessarily have to give us all of these types of personal information.

Types of personal information	Examples of personal information
Identity information and contact details	<ul style="list-style-type: none"><li>• Name</li><li>• Date of birth</li><li>• Mailing or residential address</li><li>• Telephone numbers</li><li>• Email addresses</li></ul>
Government related identifiers and identity documents	<ul style="list-style-type: none"><li>• Tax File Number (TFN) or Tax Identification Number (TIN) and country of tax residency</li><li>• Medicare card, passport or driver's licence details</li><li>• Citizenship, birth certificates or Visa status details</li></ul>
Employment Information	<ul style="list-style-type: none"><li>• Employment status and history</li><li>• Your qualifications</li><li>• Income, salary and bonus information</li><li>• Reference checks and other conduct information</li></ul>
Financial information	<ul style="list-style-type: none"><li>• Banking details</li><li>• Superannuation details</li></ul>

Types of personal information	Examples of personal information
Background check information	<ul style="list-style-type: none"> <li>• Criminal history details</li> <li>• Employment reference and eligibility details</li> <li>• Historical bankruptcy and credit details</li> <li>• Other financial and regulatory checks</li> </ul>
Digital information	<p>We collect information from you electronically when you visit our websites. This includes information such as:</p> <ul style="list-style-type: none"> <li>• the time and date of the visit;</li> <li>• location information (if enabled on your device);</li> <li>• internet protocol (IP) details of the device used to access the site;</li> <li>• information about the electronic devices (computers, mobile phones or tablets) you use to access our platforms and how you use them, including details relating to your devices, their operating systems, browsers, other installed applications and settings; and</li> <li>• information or documentation that you download.</li> </ul>
Camera surveillance	<p>For the safety of our staff and customers, we use camera surveillance, such as CCTV, to monitor our premises.</p>
Sensitive information	<p>On occasion, we collect and handle sensitive information. This may include:</p> <ul style="list-style-type: none"> <li>• health information e.g. physical or mental conditions where it is relevant to your ability to perform a role;</li> <li>• diversity and inclusion information e.g. gender identity, race or ethnicity, disability information; and</li> <li>• criminal history and political affiliation, where it is relevant for our regulatory and/or legal obligations.</li> </ul>
Biometric information	<p>We collect behavioural and analytical biometric information which may include things like screen movement and information related to how you use and interact with our online applications and websites. If we collect your physical biometric data, such as your facial image or fingerprint we will only do so after requesting and receiving your explicit consent.</p>
Publicly available information	<p>We may collect and handle information that is in the public domain, such as:</p> <ul style="list-style-type: none"> <li>• forums, websites, social media (for instance, if you use social media to make a complaint); and</li> <li>• information available on public registers (for example, from Australian Securities and Investments Commission or Land Registry Services).</li> </ul>

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

The purposes for which we collect, hold, use and disclose your personal information depends on the nature of your relationship with us. In addition to the below, we may also use your personal information for secondary purposes such as audits.

If you don't give us all or some of your personal information, depending on the nature of our relationship with you, we may be unable to:

- process your employment application or your engagement as a contractor;
- properly administer or manage the activities we have agreed to;
- meet our contractual obligations; and
- accept your participation in our survey or research project.

Your relationship with us	Why we collect your personal information
Recruitment candidates and Contractors	<p>We use your personal information to undertake our recruitment activities including:</p> <ul style="list-style-type: none"> <li>• assessing your eligibility and suitability for the role for which you have applied or other potential roles;</li> <li>• assessing your eligibility and suitability to provide the contracted services;</li> <li>• communicating with you regarding the role or other potential roles;</li> <li>• where we wish to make a formal offer of employment, preparing and issuing a contract of employment;</li> <li>• for contractors entering into a contract for your services;</li> <li>• complying with our legal and regulatory obligations;</li> <li>• resolving any disputes that we may have.</li> </ul>

Your relationship with us	Why we collect your personal information
Service providers	<p>We use your personal information to undertake a range of operational and administrative tasks in connection with your engagement. This includes:</p> <ul style="list-style-type: none"> <li>• complete due diligence activities to assess your eligibility and suitability to provide the contracted services;</li> <li>• entering a contract for your services;</li> <li>• arranging payment for your services and any reimbursement of costs; and</li> <li>• managing our working relationship with you including communicating with you and overseeing the services you provide to us.</li> </ul>
Entrant in People First Bank Photographic Awards and other programs and competitions	<p>We use your personal information to administer programs and competitions including People First Bank Photographic Awards, including:</p> <ul style="list-style-type: none"> <li>• assessing your eligibility to enter the programs, competitions and awards;</li> <li>• communicating with you in relation to the programs, competitions and awards;</li> <li>• market our products and services to you;</li> </ul> <p>If you consent, we may use your personal information for marketing purposes.</p>
Charity or community group with which we have community engagements or sponsorships arrangements (excluding grant activities undertaken by People First Bank Foundation)	<p>We use your personal information to manage our relationship with you, including:</p> <ul style="list-style-type: none"> <li>• Communicating with you regarding the parties' obligations under any agreements we have entered into</li> <li>• Administering any community grants and sponsorship arrangements</li> <li>• Assessing your eligibility and suitability for the community engagement or sponsorship arrangement.</li> </ul>
Attendees at our functions, events and meetings	<p>We may collect personal information including images or videos of you when you attend our functions, events or meetings including:</p> <ul style="list-style-type: none"> <li>• For use on our websites</li> <li>• For use on our social media platforms</li> <li>• For use in internal training materials.</li> </ul>
Participant in survey and research projects	<p>We collect your personal information to enable us to understand your experiences with both us and/or other financial institutions, including products, services, and the offerings provided by other financial institutions in general, to improve our customer experience, products and services.</p>

## 5. Disclosing your Personal Information

We may use your personal information for the purposes described in this Privacy Policy. In doing so, we may disclose your personal information with a range of third parties.

The extent to which your personal information is disclosed with these third parties depends on the nature of our relationship with you.

Type of third party	Details about the third party
Heritage & People's Choice Limited (including its employees) (HPC)	<p>If you apply for a job with or are a contractor to People First Bank Foundation then your personal information may be shared with HPC under this Privacy Policy. This is because HPC provides operational and administrative services to its controlled entities. Unless you have expressly agreed, HPC will not use the information shared under this Privacy Policy to market its products and services to you.</p>

Type of third party	Details about the third party
Our service providers	<p>This includes:</p> <ul style="list-style-type: none"> <li>• Companies that undertake employee due diligence (e.g. background, criminal history, bankruptcy checks) on our behalf.</li> <li>• Companies that undertake psychometric assessments on our behalf.</li> <li>• Companies that provide survey and research related services on our behalf. This includes survey data analysis.</li> <li>• Providers who maintain, review and develop our business systems and infrastructure (including IT platform providers).</li> <li>• Professional service providers e.g. legal, tax, audit and accountancy advisers.</li> <li>• Other financial institutions, merchants, and payment organisations.</li> <li>• Companies who may administer prizes or rewards for competitions.</li> </ul>
Regulatory authorities, law enforcement and other government entities	<p>We may be required to share information with regulatory authorities, law enforcement agencies and government agencies if required or permitted by law. These may include:</p> <ul style="list-style-type: none"> <li>• Office of the Australian Information Commissioner (OAIC)</li> <li>• Australian Securities and Investments Commission (ASIC)</li> <li>• Australian Taxation Office (ATO)</li> <li>• SafeWork SA</li> <li>• WorkSafe Qld</li> </ul> <p>This may include for the purposes of preventing or managing the risks associated with a communicable disease. In these circumstances, personal information (including sensitive information) may be used or disclosed.</p>
Other third parties	<p>This includes:</p> <ul style="list-style-type: none"> <li>• For job applicants and contractors, recruitment agencies who may have put you forward for a role.</li> <li>• If you are a competition entrant or other promotion participant and you consent, we may publish your personal information on our website or our social media channels.</li> </ul>

### Overseas recipients

Your personal information may be sent outside Australia where, for example:

- You have requested or consented that we send your personal information.
- We outsource a function or service to an overseas contractor with whom we have a contractual arrangement.
- We need to undertake international employee due diligence checks because you have worked outside of Australia in the prior 10 years.

We will only send your personal information outside Australia if we are satisfied that the recipient of the personal information has adequate data protection arrangements in place.

Overseas organisations may be required to disclose information we share with them under a foreign law. Where personal information has been disclosed overseas, there is a possibility the recipient may be required to disclose it under a foreign law. Where this occurs, such disclosure is not a breach of the Privacy Act.

The countries to which we are likely to disclose your personal information (including credit information and credit eligibility information) are: Countries within the European Union (e.g. Germany, Ireland, the Netherlands, Poland and Romania), India, Malaysia, Philippines, Singapore, United Kingdom, United States of America.

## 6. Protecting your personal information

We may hold your personal information in either electronic or hard copy form. This may be stored on our behalf by trusted third party providers.

We use many physical, administrative, personnel and technical measures to protect the confidentiality and integrity of the personal information we hold about you. Ways we do this include:

- Confidentiality requirements for employees.
- Document storage security policies.
- Security measures for access to our systems and physical locations.
- Electronic security systems, such as firewalls, virus software and data encryption on our websites.

We will also only keep your personal information for as long as it is needed (including when we are no longer required by law to keep such records). When your personal information is no longer needed, we will take reasonable steps to ensure that it is destroyed or permanently de-identified.

## 7. Accessing and updating your personal information

You have the right to access, update or request us to correct your personal information at any time. You will need to provide us with sufficient identification for us to make sure it's you before we can process your request.

In limited circumstances we can deny you access to your personal information. If we do, we will tell you the reason for our refusal, unless we are prohibited from doing so. You can contact us if you would like to challenge our decision to refuse access.

It's important that you let us know as soon as possible if your personal information such as your contact details change. You can ask us to correct any personal information we have about you at any time.

## 8. We're here to help

If you would like to talk to us or make a complaint about how we handle your personal information, or you think we have failed to comply with our obligations under the Privacy Act, please contact us:

Our relationship	Direct contact
Entrant in People First Bank Photographic Awards and other competitions	photographicawards@heritage.com.au
Community engagements and sponsorships (excluding grant activities for People First Bank Foundation)	info@heritage.com.au
Recruitment candidates and contractors	hr.recruitment@heritage.com.au careers@peopleschoice.com.au
Vendors and service providers	procurement@heritage.com.au

You can also:

- Write to us at: People First Bank, GPO Box 1942, Adelaide SA 5001
- Call us on 13 11 82
- Direct message us via Facebook, Instagram, LinkedIn or any other social media channels on which we are active.

### What happens when you make a complaint?

We try to resolve most complaints within 30 days. However, it may take longer if we need more information or if your complaint is complex.

In all cases, we'll keep you updated on the progress of your complaint.

If you have entered into a contract with us which sets out a dispute resolution process applicable to your complaint, then we will comply with the terms of that contract.

### What if I'm not satisfied?

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

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

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

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