



CONSUMER DATA RIGHT POLICY.

Version 6 | Effective date: 12 April 2023

WHAT IS THIS POLICY ABOUT?

This policy explains how Virgin Money Australia, a division of Bank of Queensland Limited ABN 32 009 656 740 (together, 'we', 'us', 'our' and 'Virgin Money') manages your data under the Consumer Data Right (CDR).

The CDR was introduced by the Federal Government to allow consumers to safely share their data with providers of a wide range of services. These services could include product comparison services, a single view of your finances or smart budgeting apps. CDR is governed by strict rules (the CDR Rules) which give you specific rights and protections in relation to your data, including the way your data is accessed, shared and corrected.

Our Privacy Policy explains how we collect, use, hold and disclose your personal information more generally. If you are interested in our Privacy

Policy, please download it here: [Privacy Policy](#)

WHAT CAN YOU DO UNDER THE CDR?

Under the CDR, you can authorise us to share your CDR data with other accredited organisations, including banks and financial services organisations who are accredited by the Australian Competition and Consumer Commission (ACCC).

CDR data includes your contact details, account information, transaction records and specific information about the banking products you have. You can decide when to share your CDR data, what CDR data you share, and with whom.

Virgin Money acting as a holder of CDR data.

VOLUNTARY DATA

The CDR initially applies to certain types of products for certain types of consumers. Over time, the CDR will expand to cover a broader number of products and consumers.

At the moment, the CDR applies to 'required' and 'voluntary' types of data:

- Required Data: information that we are required to provide.
- Voluntary Data: is other information that we may choose to provide.

We do not currently accept requests for Voluntary Data.

HOW CAN YOU ACCESS YOUR CDR DATA?

You can share your CDR data with any accredited organisation of your choice. Data sharing is arranged through the accredited organisation's app or web site. They will give you the choice to select your Virgin Money data for sharing. You will then be securely connected to Virgin Money to authorise the sharing using your Virgin Money Customer ID and a one-time password. Note that you will never be asked to share your Internet banking password.

You can see your sharing arrangements in your Data Sharing Dashboard and you are able to revoke those arrangements at any time from that dashboard, or by contacting us.

When you are sharing joint accounts, you will see notifications related to the joint account (such as when another joint account holder shares the account data or a consent expires) in your Data Sharing Dashboard.

HOW CAN YOU CORRECT YOUR CDR DATA?

If you believe your CDR data is inaccurate, out of date, or incomplete, you can request that we correct it. We will confirm that we have received your request as soon as possible, verbally or in writing.

We will let you know in writing whether we corrected your CDR data or not within 10 business days. If we don't agree that the information is inaccurate, we'll tell you why – and what you can do if you're not satisfied with our response. We will not charge a fee for this.

If you are an individual, you also have the right to access and correct personal information we hold about you. You can do this by contacting us via any of the methods listed below at 'How can you contact us?' Refer to our Privacy Policy at [Privacy Policy](#) for more information.

Virgin Money acting as a recipient of CDR data – Virgin Money app.

SHARING YOUR DATA FROM ANOTHER BANK WITH US

You can share account and transaction data from your other banks with us so we can support you taking control over your financial goals by allowing you to see your account and transaction details from other banking providers conveniently in one place through the Virgin Money app.

We also use this information to provide you with insights about your money and to optimise tools to help you manage your money more effectively. Details of the data you can give consent for sharing include:

Personal and account balance details

- Name of account
- Type of account
- Account balance
- Account number
- Interest rates
- Fees
- Discounts
- Account terms
- Account mail address

You may also be able to share with us your personal details including your name and contact details.

TRANSACTION DETAILS

- Incoming and outgoing transactions
- Amounts
- Dates
- Descriptions of transactions
- Who you have sent money to and received money from

You'll receive a consent receipt at the time of providing consent or after you've withdrawn your consent or it expires. We will also notify you as soon as practicable after we have collected your CDR data from another banking provider, and we may remind you regularly on the consents you provided to us.

MANAGING THE DATA YOU SHARE

At any time, you can access both the consents provided, in terms of its scope and duration, and a summary of data retrieved from the nominated bank account in a dashboard available in the Virgin Money app under the 'Manage Data Sharing' section of your settings. You will be able to change the consents you provided or communicate any changes through this dashboard.

You can also withdraw any of your consents provided at any time within the 'Manage Data Sharing' section of our app. When you withdraw your consent, we will stop collecting and using CDR data from the relevant banking provider and we will be deleting data we previously received from this banking provider. Withdrawing your consent will limit the way we can help you track your budget. For example, if you stop sharing transaction details, we will no longer be able to update you on your spending habits.

The information we hold is stored securely within Australia in line with the requirements set out by the ACCC under the CDR legislation and in line with our information security standards which we apply to our own banking data. We do not store your CDR data outside Australia.

We will not make available your CDR data to anyone outside Virgin Money Australia or its service providers unless required to do so by law or a court order.

Virgin Money has a general policy of deleting redundant data. We will delete all banking data collected and held under your consent in accordance with the CDR Rules within 24 hours from when:

- your consent for us collecting and using CDR data expires or you withdraw relevant consent
- the authorisation you gave to your external banking provider to share CDR data with us expires
- your external banking provider notifies us that you cease to be an eligible consumer with them
- you close your account with us
- you close an account at another bank that you have shared with us

You should note that we will generally perform this through a daily process. We will not be able to delete data if certain Australian laws require us to retain such data.

Data is held in backup systems (which Virgin Money and partners maintain for business continuity and risk management purposes) but cannot be directly used by Virgin Money and will be deleted in line with normal backup refresh procedures.

This means that your data contained in backup systems is not accessible to anyone without invoking business continuity procedures, which may occur during a significant disaster or cyber security event.

Virgin Money will notify you via email:

- when you consent to collect, hold, use and/or disclose your CDR data
- when you amend or withdraw a consent
- when we disclose to any accredited persons
- when we disclose to any non-accredited entities such as a trusted advisor
- every 90 days for each active consent
- when you request a correction of your data
- in the event of a data breach e.g. someone gaining unauthorised access which results in loss of CDR data, we would notify you as soon as practical in order to take appropriate action if required

PARTNERS WE WORK WITH IN COLLECTING AND MANAGING YOUR CDR DATA

To help us provide the best experience to you we work with leading Australian partners to collect and manage your data.

When you choose to share your data held with your other banking providers with us, we will use the services of Frollo Australia Pty Ltd ABN 49 613 113 269, an ACCC Accredited Data Recipient, to assist us collecting, aggregating, and holding your CDR data described above.

Information relating to Virgin Money as both a holder and recipient of CDR data.

HOW CAN YOU MAKE A COMPLAINT?

We are committed to resolving any complaint you may have about the management of your CDR data. You can make a complaint in several different ways:

- by telephone
- by email
- in writing
- via Virgin Money's website

Our contact details are listed at 'How can you contact us?' below.

To help us resolve your complaint, you will need to provide us with information such as your name, contact details, and the nature of your concern.

One of our representatives will be in contact with you within one business day regarding your complaint. Our representative will let you know who will be assisting you, their contact details and the expected resolution date of your issue. We aim to resolve all complaints related to CDR data within 30 days.

The kind of resolution we provide will depend upon the nature of your issue or complaint. Resolution options could include correction of data, deletion of data, and issue of an appropriate complaints resolution as per our standard complaints policy.

If the issue is a more complicated one, we may ask you for additional documentation to help resolve the issue. In turn, we will keep you updated on the progress of your complaint. We will also provide you with information on how to contact an external dispute resolution scheme.

For more details on our complaint handling process, please refer to our complaint handling guide in Appendix A.

OPTIONS FOR REDRESS

The remedy for a complaint will depend entirely on the nature of the complaint and will be provided to best address the particulars of the situation. Remedies could include an apology, correction or deletion of data, an explanation of the circumstances giving rise to the complaint, provision of assistance or support or an undertaking to set in place improvements to systems, procedures or products.

INTERNAL REVIEW

If you are not satisfied that the matter has been resolved, we can forward the complaint to our Customer Relations Team. This team will review the complaint and take further action in an attempt to resolve it.

Customers may contact the Virgin Money Customer Relations Team by any of the following means:

Phone (Aust): 1800 574 766

Email: customer.relations@virginmoney.com.au

Mail: Virgin Money Customer Relations,
Reply Paid 2258, Brisbane Qld 4001

EXTERNAL REVIEW

In the unlikely event that your complaint remains unresolved to your satisfaction through the internal procedures outlined above, you may elect to refer your complaint to external dispute resolution. To do this, you can contact the Australian Financial

Complaints Authority at:

Australian Financial Complaints Authority Limited

Phone: 1800 931 678

Website: www.afca.org.au

Mail: GPO Box 3, Melbourne, VIC 3001

Or if your complaint is in relation to our handling of your CDR data, you may contact the Office of the Australian Information Commissioner (OAIC) at:

www.oaic.gov.au

Online form: [Consumer Data Right Complaint](#)

Phone: 1300 363 992

Mail: OAIC, GPO Box 5218, Sydney, NSW 2001

HOW CAN YOU OBTAIN A COPY OF THIS POLICY?

You may obtain a copy of this policy, free of charge, in either electronic or paper form as follows:

- Download an electronic copy using the following link: [CDR Policy](#)
- Download an electronic copy from the links on our web site and in our CDR consumer dashboard
- Obtain a paper copy by contacting us as detailed below and requesting a copy

HOW CAN YOU CONTACT US?

If you have any further questions or concerns about the way we manage your CDR data, please contact us:

Phone: 13 81 51 (24 hours a day, 7 days a week)

Email: customer.relations@virginmoney.com.au

Mail: Virgin Money Customer Relations, Reply Paid
2258, Brisbane, QLD 4001

Appendix A – VMA complaint handling guide.



VIRGIN MONEY COMPLAINT GUIDE

May 2022

IF YOU'RE NOT HAPPY WITH OUR SERVICE, WE WANT TO FIX IT

We're always looking for ways to improve our service, and hearing from customers is a key part of that.

If we don't meet your expectations, we want you to tell us what happened and how we can improve what we do. By hearing your complaint and working with you to resolve it, we'll learn how to prevent it happening again.

What happens when you make a complaint

If you make a complaint we'll take you through a simple process. Throughout this process we will:

- acknowledge your complaint promptly
- apologise if we've done something wrong
- listen and try to understand your concerns
- treat you with respect, sensitivity and compassion
- consider your complaint fairly and objectively
- act with integrity.

We're happy to help you at any time during the process with any specific needs you may have (see *Extra support* below).

Asking someone to represent you

You can ask another person to manage your complaint for you, such as a family member, lawyer or financial counsellor. You'll need to give them a written authorisation so they can prove that they're acting for you. In some cases we may still need to contact you directly.

You can locate the Authority Form at www.virginmoney.com.au/complaints.

HOW TO MAKE A COMPLAINT

1. Tell us what happened

Contact us using any of the methods and tell us:

- your full name and address (or if someone is representing you, their contact details)
- what went wrong
- what you'd like us to do to fix it.

You can:



Call our local Customer Care Team on **13 81 51** between 8:00 am – 8:00 pm AEST, Monday to Friday or between 9:00 am – 5:00 pm AEST on Saturday.



Send an email to one of the below:

Home Loans and Home Loan Companion account
service@virginmoney.com.au

Transaction and Savings accounts
ask@virginmoney.com.au



Send a letter to
Virgin Money Customer Relations
Reply Paid 2258, Brisbane Qld 4001

2. We'll acknowledge your complaint and try to resolve it

If we receive your complaint over the phone, we'll acknowledge your complaint and try to resolve it immediately.

If we receive your complaint in writing, we will:

- acknowledge it within 1 business day
- give you the name and contact details of the person handling your complaint.

If we can't resolve your complaint immediately, we'll tell you:

- who will be handling your complaint
- their contact details
- when you can expect us to resolve it.

How we'll review your complaint

We'll aim to find a fair solution to your complaint using all relevant information and common sense. We'll consider your conduct, our conduct and the contract between us. During our review we may need to ask you for more information.

How long it will take

If your complaint is about financial hardship or a default notice, we'll try to resolve it within 21 days. All other complaints we aim to resolve within 30 days.

If we need more time, we'll explain why and tell you when you can expect our response. We'll also tell you about your right to take your complaint to the Australian Financial Complaints Authority.

How we confirm the result

We'll confirm any resolution of your complaint in writing if:

- the complaint was about financial hardship, or
- it takes more than five business days to resolve, or
- you ask us to.

If you're satisfied with how we've resolved your complaint, that's the end of the process.

3. If you're not satisfied with our response

If you're not satisfied with how we've resolved your complaint, you can ask our internal Customer Relations team to review our decision or you can take it to the independent, external dispute resolution scheme provided by the Australian Financial Complaints Authority (AFCA).

Contacting Customer Relations

You can contact our Customer Relations team on **1800 574 766** between 8:30 am – 5:00 pm AEST, Monday to Friday or send an email to customer.relations@virginmoney.com.au.

Contacting AFCA

If you're not satisfied with our response, you can ask the Australian Financial Complaints Authority (AFCA) to review it. AFCA provides a free, independent external dispute resolution process.

To contact AFCA:



Call them on **1800 931 678** (free call)



Send an email to info@afca.org.au or go to www.afca.org.au

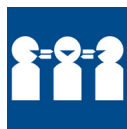


Send a letter to
Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

You can find out more about AFCA at www.afca.org.au

EXTRA SUPPORT

If English isn't your first language



Interpreter services

If you'd rather speak to us in another language we can arrange an interpreter to help you when you call us. The interpreter services are available free of charge.

Translation services

This document is available at www.virginmoney.com.au/complaints in Mandarin, Vietnamese, Arabic, Korean and Cantonese.

If you have vision impairment or low vision

Braille version

Please contact us if you need a Braille version of this document. We'll arrange to have it sent to you free of charge.

If you're deaf, hard of hearing or have a speech impairment

We welcome calls through the National Relay Service. To contact them:

- Telephone Typewriter (TTY), call **133 677**
- Speak and Listen (Voice Relay), call **1300 555 727**
- NRS Chat (Internet Relay), connect to the NRS website or app.

When you get through, ask to be connected to Virgin Money Customer Care Team on **13 81 51**. We're available between 8:00 am – 8:00 pm AEST, Monday to Friday or between 9:00 am – 5:00 pm AEST on Saturday.

The NRS relay officer is present throughout the call to ensure smooth communication, but doesn't change or interfere with what the parties say.

You can find information about which type of call is right for you, and information about their privacy policy on the NRS website:

Website: www.relayservice.gov.au

Email: helpdesk@relayservice.com.au

SMS: **0416 001 350**

Voice: **1800 555 660**

TTY: **1800 555 630**

If you would like a simplified version of this guide

We know that our customers have a diverse range of communication needs and by providing an Easy English guide on how to make a complaint, we are providing a different way for you to access this important information. You can download the Easy English guide at www.virginmoney.com.au/complaints.



virginmoney.com.au