

## **Commonwealth Bank of Australia, Tokyo Branch**

### **Privacy Policy Statement**

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#### **◆ How we handle your personal information**

Personal information is information about a living individual that includes name, address, date of birth, Social Security and Tax Number (referred to as 'My Number') or any other description that identifies an individual. The Tokyo Branch of Commonwealth Bank of Australia (Branch) will act to protect your personal information in compliance with all laws and ordinances and guidelines of the Financial Services Agency as well as other standards that relate to Personal Information Protection.

We value your trust and aim to help you manage and build wealth over a long period. The protection of your personal information is a vital part of this relationship. It is supported by our long experience of keeping personal information confidential.

The information in this document details what we must do and what we must tell you to comply with the requirements of laws, ordinances and guidelines of the Financial Services Agency as well as other standards about Personal Information Protection. We publicly announce this Policy Statement by placing copies of this document on our Branch website.

### **1. Collection of Personal Information**

#### **◆ Why we collect personal information**

The Branch is engaged in banking business (deposits, money transfer, exchange, lending, foreign exchange and auxiliary businesses) and Registered Financial Institution business (OTC Derivatives). We collect personal information to execute and manage the transactions that you request, and to perform the checks required by the Japanese law. More specifically, we collect personal information to the extent necessary to accomplish the following:

- to accept your request for a financial product or service such as account opening and overseas remittance;
- to check your identification pursuant to Japanese laws and regulations such as Customer Identification Law and Foreign Exchange and Foreign Trade Law;
- to confirm your competence as representative or agent upon entering into agreements including deposits, loans, foreign exchange and derivative transactions;
- to check various conditions required for a transaction;
- to administer our customer relationships;
- to provide information on the products and services offered by the Branch and other members of Commonwealth Bank Group;
- to take measures to detect and prevent frauds and credit loss; and
- to exercise our rights and obligations either through contractual binding agreements with you or under the provisions of the law;
- 'My Number' is limited to collection for use in the account opening process, creation or submission of legal documents relating to transactions of financial products by individuals and tax inspection, assets investigation in the social security.

Personal information collected for the purposes listed above shall only be used as far as necessary to carry out business activities and shall not be used for purposes other than the intended purpose.

## **What personal information we collect**

Personal information collected by the Branch generally comprises name, address, date of birth, My Number and contact details (including phone, fax and e-mail). In some circumstances, we collect additional personal details such as nationality and account number in connection with a transaction being offered.

We are required by law to identify you if you are initiating a transaction with the Branch, entering into a cash transaction over Yen 2 million, or applying for an overseas remittance. If you are an individual customer, we are required to check and record your full name, address, date of birth and My Number on certain official documents (e.g. driver's license, passport, My Number card etc.).

Where it is necessary to do so, we also collect information about individuals such as company directors, officers (where a company is our customer) as well as customers' agents and persons dealing with our Branch on a 'one-off' basis.

We do not collect sensitive information (your political or religious beliefs, ethnic background etc.). Any sensitive information stated on a copy of official identification document such as domicile of origin will be blacked out before filing.

### **◆ How we collect your information?**

We may collect your personal information by asking you to complete an application form, or to present ID documents, as well as by contacting you via mail, phone and fax etc.

When we collect personal information that is written on an application form etc., we will notify you of the purpose of collecting that information in writing.

### **◆ What if you provide incomplete or inaccurate information?**

We may not be able to provide you with the products or services you are seeking.

## **2. Disclosures**

### **◆ Other members of the Commonwealth Bank Group**

Your personal information collected by Branch may be shared with other members of the Commonwealth Bank Group for the purposes of providing you with financial services and to manage any affiliated risks.

'My Number' will not be disclosed by the Branch to any other members of the Commonwealth Bank Group with or without your consent.

### **◆ Outsourcing contractors and auditors etc.**

The Commonwealth Bank of Australia (including Tokyo Branch) outsource IT services. We sometimes seek advice from external specialists and auditors. In all circumstances where personal information may become known to contractors and agents, there are confidentiality agreements in place.

The Commonwealth Bank of Australia takes its obligations to protect customer information very seriously and we make every effort to deal only with parties who share and demonstrate the same attitude.

## **Sending personal information overseas**

We send personal information (excluding My Number) overseas in order to supply you with products and services. For example, to comply with "FATF Special Recommendations on Terrorist Financing" which require us to include your personal information (name, address, and account number) in the payment instructions send to other financial institutions when processing remittance requests.

### ◆ **Third party disclosure**

Except for the circumstances specified above, we do not disclose personal information we hold to a third party without obtaining your consent in advance. 'My Number' will not be disclosed by the Branch to any 3<sup>rd</sup> party with or without your consent. However, we may disclose your information (including My Number) if it is required by law or if it is necessary to protect the interests of yourself or general public.

## **3. Personal Information Quality**

### ◆ **Personal information quality**

Our goal is to ensure that the personal information we hold is accurate, complete and up-to-date. Please contact the Inquiries Desk below if any of the details you have provided to us change.

## **4. Personal Information Security**

We are committed to ensure the security of your personal information. We take all reasonable precautions to protect the personal information we hold about you from loss, damages and leakage.

We have a range of security policies in place to provide a robust security environment. We ensure the ongoing adequacy of these measures by regularly reviewing them.

Our security measures include but are not limited to:

- restricting access to our computer systems and physical records to authorized persons and preventing users from accessing information they have no need to access;
- requiring employees to use unique passwords to gain access to systems. These passwords are changed regularly and their use is independently monitored;
- employing firewalls, intrusion detection systems and virus scanning tools to prevent unauthorized persons and viruses from entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- practising a clean desk policy in all of the Group's premises and providing secure storage for physical records; and
- detecting and preventing unauthorized access to buildings by employing physical and electronic means such as alarms, cameras, and guards as required.

Where information we hold is identified as no longer needed for any purpose, we ensure it is effectively and securely destroyed. For example, by shredding or pulping in the case of paper records or by degaussing and other means in the case of electronic records and equipment.

## **5. Telephone**

We monitor and record telephone calls for deal confirmation and security purposes.

## 6. Direct Marketing

The personal information (excluding My Number) collected from you may be used to provide you with information on products offered by or through the Branch and other members of the Commonwealth Bank Group. However, you may, if you wish, indicate that you do not want to receive information on products offered by or through the Branch by contacting Branch staff or the Inquiries Desk below.

Please note that if you provide your information to more than one member of the Commonwealth Bank Group, you will need to tell each member should you wish to 'opt out' of receiving information from them.

## 7. Access to Personal Information

You can request us to provide you with access to the personal information we hold about you. Unless there is a particular reason, we will respond to your access request as soon as possible after your personal identity has been checked. Additionally, we will correct any inaccurate information upon your request. Please contact the Inquiries Desk detailed below. Kindly note that there may be costs applied to for granting you access to your personal information.

### ◆ Requests may be denied or limited

If particular circumstances apply, we have the right under the laws and ordinances about Personal Information Protection to deny your request for access, or to limit the access we provide to your personal information. We will provide you with the reason why a request is denied or limited.

We will respond 'Yes' or 'No' to a request on whether we are in possession of your 'My Number'.

### ◆ Jointly held information

Where we hold your personal information in conjunction with that of another individual or individuals (e.g. where you jointly conduct an account with other persons), we will allow each individual access to his or her own personal information as well as the joint information (e.g. account balances and transaction details) but not to any other personal information belong to other individual(s).

## 8. Changes to our Privacy Policy Statement

We may make changes to this Privacy Policy Statement from time to time for any reason. This document is dated 1 January 2016. For the latest version, please apply at the Inquiries Desk.

## 9. Inquiries Desk about the Privacy Policy Statement

If you have any questions, complaints or would like to obtain further information about our Privacy Policy Statement, please contact us by:

- E-mail: [Takao.Uehara@cba.com.au](mailto:Takao.Uehara@cba.com.au)
- telephone: 03-5400-7857
- mailing to the address below:  
Commonwealth Bank of Australia, Tokyo Branch  
Toranomom Waiko Building 8<sup>th</sup> Floor  
12-1 Toranomom 5-chome, Minato-ku,  
Tokyo 105-0001

◆ **Making a privacy complaint**

We recognize that even with the best practice organizations things can go wrong. Should you have a privacy complaint, please notify us because it gives us the opportunity to fix the issue. We will take all the necessary steps to investigate the complaint, answer your questions and do all we can to regain your confidence.

1 January, 2018

Martin Spann  
Country Manager and Head of Tokyo Branch  
Commonwealth Bank of Australia