## Enforceable Undertaking offered to the Australian Information Commissioner

Summary and Timetable of Agreed Work Plan 15 May 2020	Year 1 – June 20	Year 2 – June 21	Year 3 - June 22	Year 4 – June 23
Policy, Privacy Procedures and Retention Standard Update CBA's internal privacy policy, procedures and retention standard. Ensure the policy, procedures and retention standard are implemented across CBA Banking Services,* provide training, and implement an annual review of compliance.				
Privacy Impact Assessments Update CBA's privacy impact assessment process. Ensure the privacy impact assessment process is implemented across CBA Banking Services* and ensure employees undertake privacy impact assessments as required by internal procedures.				
CBA Key Applications  For key applications, review access controls and implement annual review of access profiles to ensure continued eligibility for access to personal information. Review & improve data logging and apply internal user behavioural analytics to key applications.				
Contractors (Third Party Suppliers) Review privacy risk management and monitoring processes for contractors, including ensuring that contractors undertake to provide privacy training to their employees.				
Data Tapes Identify magnetic data tapes and determine whether personal information on the tapes should be retained, de-identified or destroyed.				
CBA Customer Systems and Applications An Independent Expert will review all CBA IT Services that collect or hold customer personal information and prepare an action plan. CBA to implement the Independent Expert's recommendations.				

<sup>\*</sup>CBA Banking Services means any business conducted by CBA, or by a subsidiary of CBA, that provides banking or financial products and services to consumers in Australia, excluding any financial planning services not provided under the Commonwealth Financial Planning brand or any products or services provided by, or operations conducted under, the 'Bankwest' brand; and any products or services provided, or operations conducted, by a CBA Excluded Subsidiary\*\*

<sup>\*\*</sup>any CBA subsidiary incorporated outside Australia; CBA subsidiary not 100% owned by CBA; Residential Mortgage Group Limited & subsidiaries; Australian Investment Exchange Limited; and AHL Holdings Pty Ltd & subsidiaries.

