



Cuscal

Consumer Data Right Policy

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Sensitivity: Confidential



1. Introduction

Cuscal Limited (ABN 95 087 822 455) is an Authorised Deposit-taking Institution ("**ADI**") and Australian Financial Services Licensee that provides payment and regulated data services to banks, corporates, and Fintech and 'PayTech' enterprises, enabling those clients to provide services to their end customers. Cuscal has been operating since the 1960s (through its earliest predecessor) and has evolved from its origins as an aggregator of services for mutual ADIs to a manufacturer of products and services in its own right and a trusted payments and regulated data solutions provider across a diverse client base.

Cuscal provides a software service called "myCDR" that allows consumers to access their own consumer data under the Consumer Data Right and is accredited as a data recipient under the *Competition and Consumer (Consumer Data Right) Rules 2020* (the "**CDR Rules**").

For more information about Cuscal, visit us at cuscal.com/about-us.

2. Consumer Data Right (CDR)

The Australian government introduced the Consumer Data Right ("**CDR**") to give consumers greater access and control over their data, and the ability to share this data with service providers. Under the Consumer Data Right, specified data that relates to a consumer is termed as "**CDR Data**" and is held by organisations who are known as "**Data Holders**". For example, in the case of banking sector, a Data Holder is the bank that provides a consumer with banking services. The CDR provides consumers the right to authorise Data Holders to share their CDR Data with authorised accredited third parties known as "**Accredited Data Recipients**".

3. About this policy

As an Accredited Data Recipient, Cuscal is subject to strict controls under applicable CDR legislation and privacy laws.

This policy explains when and how Cuscal collects, uses, holds and/or discloses your CDR Data in accordance with the consent you provide and the CDR Rules. This policy also explains how you can manage your CDR Data and associated consents, resolve concerns and lodge complaints.

If you would like more information on how Cuscal manages personal information generally, please refer to Cuscal's privacy policy [here](#).

4. Privacy and security of the CDR Data

Protecting Consumer privacy is important to us. Cuscal has robust systems, policies, and procedures to keep information safe and meet its legislative obligations under the Australian Privacy Law. We maintain strict procedures and standards and take all reasonable care to prevent unauthorised access to, and modification and disclosure of, your CDR Data.

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5. What CDR Data can we collect?

You can share the following types of CDR Data with us:

Personal Information:

- ☐ Name
- ☐ Occupation
- ☐ Phone Number
- ☐ Email address
- ☐ Mail address
- ☐ Residential Address

Account Balance and details:

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

Transaction Details:

- ☐ Incoming and outgoing transactions
- ☐ Transaction amounts
- ☐ Transaction dates
- ☐ Transaction descriptions
- ☐ Who you have sent money to and received money from

Direct Debit and Schedule Payment Information:

- ☐ Direct debit details
- ☐ Scheduled payment details

Saved Payee Details

- ☐ Names and details (e.g. BSB / Account Number, BPay reference number and biller code, NPP PayID) of payee accounts you have saved

6. How we collect CDR Data

As an Accredited Data Recipient, Cuscal can only collect CDR Data when a valid CDR Data collection consent is made by the consumer. When that consent is given, Cuscal collects your CDR Data directly from your bank or other financial institution via an application programming interface (API).

Cuscal is obligated to apply a data minimisation principle which only allows data that is required to provide the agreed services to be collected.

7. What do we do with your CDR Data

Cuscal ensures that CDR Data collected is handled securely and only used for the product or service being provided to you.

Cuscal will use the CDR Data only for the purpose agreed when you provide a CDR consent and authorised under the CDR Rules. For Cuscal's "myCDR" product, that purpose is sharing the collected CDR Data with you.

CDR Data collected by Cuscal is stored within Australia. Cuscal will not disclose your CDR Data to any third party. For further information on how long your data is stored, see section 9 below (Deleting the CDR Data we have collected).

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8. Managing your CDR Data

If you share CDR Data with Cuscal, we will give you access to a secure dashboard where you can review, modify or withdraw any CDR consent you have provided ("**Consumer Dashboard**"). You can also withdraw your consent by contacting us in writing or via the Data Holder's consent dashboard (provided by your bank or other financial institution).

You can go to the Consumer Dashboard at any time to withdraw consent and we will stop collecting and using your CDR Data. If you withdraw your consent, you will no longer be able to use the "myCDR" product to view your CDR Data.

9. Deleting the CDR Data we have collected

Cuscal will only use your data for the purpose you agreed to. Cuscal's general policy is to delete CDR Data once it becomes redundant, and we will delete the CDR Data collected under the consumer consent immediately when the data is successfully shared with the consumer. Accordingly, no further election needs to be made by the consumer for their redundant CDR Data to be deleted.

You are in control of what data you share with Cuscal and can at any time choose to revoke the consent by updating the Consumer Dashboard. As an Accredited Data Recipient, Cuscal must delete CDR Data it holds, unless the data is required to be kept under Australian law. When Cuscal deletes CDR Data, we will do so in accordance with the CDR data deletion process set out in the CDR Rules.

Cuscal does not de-identify CDR Data or retain any redundant CDR Data.

10. Notifications provided to Consumers

We will send notifications via email or SMS to the email address or the phone number, you use to log in to Cuscal's "myCDR" product.

We will notify you:

- ❑ when you consent to collect, hold, use and/or disclose your CDR Data;
- ❑ when your consent expires;
- ❑ when you make any other updates to your consent via the Consumer Dashboard; and
- ❑ if you provide an ongoing consent, every 90 days to remind you that consent is current.

We will also notify you:

- ❑ in the event of a data breach affecting your CDR Data if it is likely to result in serious harm to you;
- ❑ in response to a request for the correction of your CDR Data (see section 12 below); and
- ❑ in response to a complaint (see section 13 below).

11. Outsourced service providers

Cuscal does not rely on any outsourced service providers to provide you with the "myCDR" product.

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12. How to correct your CDR Data

If any of the collected CDR Data is incorrect you can contact Cuscal to investigate the matter. Please note that it may not be possible for Cuscal to satisfactorily address your request, because Cuscal is only able to correct CDR Data that is held in Cuscal systems. As noted in section 9 of this policy, Cuscal deletes your CDR Data shortly after it is shared with you.

In circumstances where the source of the CDR Data is incorrect, you will be referred to your designated Data Holder for investigation and subsequent correction of the CDR Data. Once the Data Holder corrects the CDR Data, you can notify Cuscal to collect the corrected CDR Data from the Data Holders to update the systems if your consent is still active and current.

13. Complaint Handling

How to make a complaint?

If you have a complaint or concern regarding your CDR Data or the service offered by Cuscal, please email us at CDRsupport@cuscal.com.au.

What information do I need to provide when making a complaint?

To enable us to review and address your concern, please provide the following information when submitting your complaint:

- your name and preferred contact details
- details of your complaint or query
- Any supporting documentation

What happens after Consumer makes a complaint?

We will acknowledge receipt of any CDR complaints within 2 business days or as soon as reasonably practicable after receiving the complaint. We will assess the information received and investigate the matter, and will endeavour to resolve your complaint within 30 days. If unable to find a resolution within 30 days, we will inform you and continue to update you on the progress.

The kind of resolution we provide will depend on the nature of your concern or complaint. Generally, where possible we will provide you with an explanation of the circumstances that may have caused your complaint in the first place and undertake any system/process improvements as reasonably practical to resolve your concerns.

If you are not happy with the resolution of your complaint

We will make every effort to resolve your complaint internally. If we do not resolve the complaint to your satisfaction of the complainant, you may wish to escalate the complaint to the external dispute resolution service free of charge.

You can engage the Australian Financial Complaints Authority (AFCA) and their contact details are as follows:

- Website: www.afca.org.au
- Email: info@afca.org.au
- Phone: 1800 931 678 (free call)
- Mail: GPO Box 3, Melbourne VIC 3001

You may also raise your concern directly with the Office of the Australian Information Commissioner:

- Website: [Contact us | OAIC](#)

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Time limits may apply to complain so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to their circumstances expires.

14. Changes to the CDR policy

We encourage you to periodically review our CDR Policy for any changes as it may change from time to time as we introduce new services. Our CDR Policy is available free of charge on the Consumer Dashboard, our public website or by emailing CDRsupport@cuscal.com.au.

15. More Information

If you have any questions regarding this Policy or would like more information about the way Cuscal manages personal information, write to the Privacy Officer, email CDRsupport@cuscal.com.au

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