

Investigation report

Summary	
Entity	Commonwealth Bank of Australia
Australian Company Number	123 123 124
Type of activity	Commercial electronic messaging
Relevant Legislation	<i>Spam Act 2003 (Spam Act)</i>
Findings	<p>For the period from 22 November 2022 to 17 April 2024</p> <p>Up to 34,859,742 contraventions of subsection 16(1) [unsolicited commercial electronic messages must not be sent]</p> <p>Up to 170,678,086 contraventions of subsection 18(1) [commercial electronic messages must contain a functional unsubscribe facility]</p>
Date	14 August 2024

Background

1. The Australian Communications and Media Authority (**ACMA**) commenced an investigation into Commonwealth Bank Australia's (**CBA**) compliance with the Spam Act on 9 January 2024 following a consumer complaint and other intelligence held by the ACMA.
2. The ACMA's findings are based on eight submissions provided by CBA between 9 June 2023 and 29 April 2024, including in response to two ACMA compulsory information gathering notices on 10 January 2024 and 23 February 2024, and a disposition to make contraventions admissions received on 17 April 2024.
3. The commercial electronic messages (**CEMs**) subject to contravention findings are collectively referred to as the 'contravening messages', specifically:
 - a. Up to 271,923 Surepay CEMs sent between 22 November 2022 and 1 June 2023 in contravention of subsection 16(1) of the Spam Act (refer to **Attachment A** to this report);
 - b. Up to 1,506,333 Surepay CEMS sent between 22 November 2022 and 1 June 2023 in contravention of subsection 18(1) of the Spam Act (refer to **Attachment A** to this report);
 - c. Up to 34,587,819 CEMs sent between 1 January 2023 and 17 April 2024 in contravention of subsection 16(1) of the Spam Act (refer to **Attachment B** to this report); and
 - d. Up to 169,171,753 CEMs sent between 1 January 2023 and 17 April 2024 in contravention of subsection 18(1) of the Spam Act (refer to **Attachment B** to this report).
4. The reasons for the ACMA's findings, including the key elements which establish the contraventions, are set out below.

Relevant legislative provisions

Commercial electronic message

5. Under section 6 of the Spam Act, a CEM is an electronic message where, having regard to:
 - a. the content of the message; and
 - b. the way in which the message is presented; and
 - c. the content that can be located using links, telephone numbers or contact information (if any) set out in the message:

It would be concluded that the purpose, or one of the purposes, of the message is:

- d. to offer to supply goods or services; or
- e. to advertise or promote goods or services; or
- f. to advertise or promote a supplier, or prospective supplier, of goods or services; or [...]

Designated commercial electronic message (DCEM)

6. The Spam Act allows for the sending of messages with factual information only that contain the names, logos and contact details of businesses. There is no requirement to have consent or provide an unsubscribe for these types of messages under the Spam Act.
7. Under Schedule 1 to the Spam Act, an electronic message is a DCEM if:
 - a. The message consists of no more than factual information (with or without directly-related comment) and any or all of the following additional information:
 - (i) The name, logo and contact details of the individual or organisation who authorised the sending of the message [...]
 - b. Assuming that none of that additional information had been included in the message, the message would not have been a CEM [...]

Consent – subsection 16(1)

8. Under subsection 16(1) of the Spam Act, a person must not send, or cause to be sent, a CEM that has an Australian link and is not a DCEM.
9. Exceptions apply to this prohibition. Specifically, a person will not contravene subsection 16(1) of the Spam Act where:
 - a. the relevant electronic account-holder consented to the sending of the CEM (subsection 16(2));
 - b. a person did not know, or could not have ascertained, that the CEM has an Australian link (subsection 16(3)); or
 - c. a person sent the message, or caused the message to be sent, by mistake (subsection 16(4)).
10. Clause 6 of Schedule 2 to the Spam Act sets out when a person withdraws consent to receive CEMs. Relevantly, paragraph 6(1)(d) provides:
 - (d) the relevant electronic account-holder, or a user of the relevant account, sends the individual or organisation:
 - (i) a message to the effect that the account-holder does not want to receive any further commercial electronic messages at that electronic address from or authorised by that individual or organisation; or
 - (ii) a message to similar effect.

11. Clause 6 of Schedule 2 to the Spam Act states that withdrawal of consent takes effect at the end of the period of 5 business days beginning on the day the unsubscribe request was sent (if the unsubscribe request was sent as an electronic message).

Unsubscribe function in CEMs – subsection 18(1)

12. Under subsection 18(1) of the Spam Act, a person must not send, or cause to be sent, a CEM that has an Australian link and is not a DCEM unless the message includes a statement to the effect that the recipient may use an electronic address set out in the message to send an unsubscribe message to the individual or organisation who authorised the sending of the first-mentioned message (subparagraph 18(1)(c)(i)).
13. Subsection 18(1) does not apply if:
 - a. the message is a ‘designated commercial electronic message’ (paragraph 18(1)(b)),
 - b. a person did not know, or could not have ascertained, that a CEM has an Australian link (subsection 18(2)),
 - c. including an unsubscribe facility would be inconsistent with the terms of a contract or other agreement (subsection 18(3)), or
 - d. a person sent the CEM, or caused the CEM to be sent, by mistake (subsection 18(4)).

Evidential burden for exceptions

14. Under subsections 16(5) and 18(5) of the Spam Act, if an entity wishes to rely on any of the above exceptions, it bears the evidential burden in relation to that matter. This means that it needs to produce or point to evidence that suggests a reasonable possibility that the exception applies.

Reason for findings

Issue 1: CEMs must not be sent – section 16

15. To determine CBA’s compliance with section 16 of the Spam Act, the ACMA has addressed the following:
 - a. Is CBA a ‘person’ to which section 16 of the Spam Act applies?
 - b. If so, did CBA send or cause the contravening messages to be sent?
 - c. If so, were the messages commercial?
 - d. If so, did the CEMs have an Australian link?
 - e. If so, were the CEMs designated as exempt (DCEMs) from the prohibition on sending unsolicited messages?
 - f. If not, did CBA claim that the CEMs were subject to any exceptions?
 - g. If so, did CBA meet the evidential burden in relation to these claims?
16. If these conditions or elements of the offence are met (and the person has not raised an exception which is supported by evidence) then contraventions are established.

Is CBA a ‘person’ to which section 16 of the Spam Act applies?

17. CBA is a company registered under the *Corporations Act 2001* and is therefore a ‘person’ for the purposes of the Spam Act.

Did CBA send, or cause to be sent, the contravening messages?

18. CBA admitted it sent the contravening messages in its submissions to the ACMA.

Were the messages commercial?

19. Section 6 of the Spam Act broadly defines a CEM as an electronic message where one of the purposes of the message is offering to supply, advertising or promoting, having regard to:
 - a. the content and presentation of the message; and
 - b. the content that can be located using links, phone numbers, or other contact information in the message.
20. For the contravening messages, the ACMA is satisfied that at least one of the purposes of the messages, was to advertise or promote CBA, CBA's products and services or third parties. Examples of messages are at **Attachments A** and **B**.
21. The ACMA assessed 955 unique templates provided by CBA that are used to send messages to its customers. The ACMA is satisfied about the commercial nature of the majority of the templates, and these were used by CBA to send the contravening messages. Some templates were considered commercial on the basis of the content of the template itself, while others were considered commercial based on the content that could be located using a link, telephone numbers, or contact information set out in the message.
22. Therefore, the contravening messages are CEMs.

Did the CEMs have an Australian link?

23. CBA's central management and business registration was in Australia when it sent the contravening messages. Therefore, the contravening messages had an Australian link.

Were the CEMs designated?

24. The contravening messages were not designated CEMs because:
 - a. they consisted of more than mere factual information and were commercial in nature (clause 2 of Schedule 1 to the Spam Act); and
 - b. CBA is not an entity of a type set out in clauses 3 or 4 of Schedule 1 to the Spam Act, i.e., a government body, registered charity, registered political party, or an educational institution.

Did CBA claim that any of the contravening messages were subject to any exceptions?

25. CBA did not satisfy the ACMA that the contravening messages were subject to any exceptions in the Spam Act, including that they were potentially DCEMs and therefore exempt from consent and unsubscribe requirements.

Respondent's submissions

26. CBA has made admissions it sent up to 34,859,742 CEMs to electronic addresses without consent, including more than 5 business days after the electronic account-holders made an unsubscribe attempt in contravention of the Spam Act.
27. CBA stated it sent the messages without consent because it had incorrectly classified some of the messages as 'service non-commercial' or 'compliance' messages. As a result, CBA did not classify some of the messages as CEMs or treated some of the messages as DCEMs which may be sent to consumers regardless of whether they had opted-out from marketing.

Conclusion

28. The ACMA is of the view that CBA has contravened subsection 16(1) of the Spam Act on up to 34,859,742 instances between 22 November 2022 and 17 April 2024, as the elements to establish contraventions are met.

Issue 2: CEMs must contain a functional unsubscribe facility – section 18

29. To determine CBA's compliance with section 18 of the Spam Act, the ACMA has addressed the following:
- a. Is CBA a 'person' to which section 18 of the Spam Act applies?
 - b. If so, did CBA send or cause the contravening messages to be sent?
 - c. If so, were the messages commercial?
 - d. If so, did the CEMs have an Australian link?
 - e. If so, were the CEMs designated as exempt (DCEMs) from the prohibition on sending unsolicited messages?
 - f. If not, did the CEMs include a functional unsubscribe facility?
 - g. If not, did CBA claim that the CEMs were subject to any exceptions?
 - h. If so, did CBA meet the evidential burden in relation to these claims?
30. Where a matter at paragraph 29 has not been considered below, the ACMA considers it has already been established under Issue 1, above.

Did CBA send, or cause to be sent, CEMs without a functional unsubscribe facility?

31. The ACMA obtained information from CBA that it sent up to 170,678,086 CEMs without an unsubscribe facility in contravention of subsection 18(1) of the Spam Act. Specifically, CBA did not include a functional unsubscribe required under paragraph 18(1)(c) of the Spam Act:
- a. a statement to the effect that the recipient may use an electronic address set out in the message to send an unsubscribe message to the individual or organisation who authorised the sending of the first-mentioned message; or
 - b. a statement to similar effect.
32. Due to the use of marketing templates and the scale of the messaging activity, the figures provided cannot be verified as exact.

Did CBA claim that any of the contravening messages were subject to any exceptions?

33. CBA did not satisfy the ACMA that the contravening messages were subject to any exceptions in the Spam Act, including that they were potentially DCEMs and therefore exempt from consent and unsubscribe requirements.

Respondent's submissions

34. CBA has made admissions about having sent up to 170,678,086 CEMs in contravention of the Spam Act.
35. CBA stated it sent the messages without an unsubscribe facility because it had incorrectly classified the messages as 'service non-commercial' or 'compliance' messages. As a result, the messages were treated as DCEMs, which do not have to contain a functional unsubscribe facility when sent. The ACMA further notes that some of the messages included a statement from CBA that the recipient could not unsubscribe.

Conclusion

36. The ACMA is of the view that CBA has contravened subsection 18(1) of the Spam Act on up to 170,678,086 instances between 22 November 2022 and 17 April 2024, as the elements to establish contraventions are met.

Conclusion

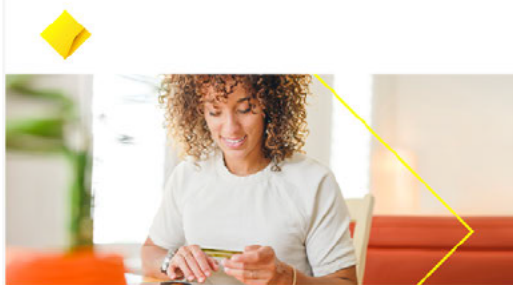
37. The ACMA finds that there are reasonable grounds to believe that CBA has, between 22 November 2022 and 17 April 2024, contravened:
- a. subsection 16(1) of the Spam Act on up to 34,859,742 instances by sending commercial electronic messages without consent; and
 - b. subsection 18(1) of the Spam Act on up to 170,678,086 instances by sending commercial electronic messages without a functional unsubscribe facility.

Attachments

Attachment A – example of CBA Surepay CEM

Attachment B – examples of CBA templates

Attachment A – example CBA Surepay CEM



Don't miss out on taking control of your credit card debt with SurePay® Instalment Plans

Pay down your Low Fee credit card ending in x1440 at 14.00% p.a., compared to your current rate of 19.74% p.a., when you set up a SurePay Instalment Plan by 30 April 2023.

Hi [REDACTED]

Want to reduce your credit card debt? There's still time to set up a SurePay Instalment Plan. SurePay is a feature of your credit card that converts your balance into fixed monthly repayments.

Take control of your debt by repaying in monthly instalments at a reduced rate of 14.00% p.a., over a term of your choice from 12, 24, 36 or 48 months. You can really save money with SurePay. The average Low Fee customer on a SurePay Instalment plan saved \$683 in interest whilst repaying their credit card debt!*

Log on to NatBank or the CommBank app and start your SurePay application to see how much you could save in interest charges with the SurePay savings graph.

[Set up SurePay now](#)

Your current rate 19.74% p.a.

Your discounted rate¹ 14.00% p.a.

SurePay plan Card balance of \$600 or more

Eligible card Low Fee card ending [REDACTED]

Term 12, 24, 36 or 48 months

Offer end date 30 April 2023

Set up a SurePay plan today

To set up a SurePay plan or see the rates available on your cards, log on to:



NetBank > Select credit card > Settings > Set up/manage SurePay plan, or



CommBank app > Accounts > Select credit card > Manage account > SurePay plans

[Set up SurePay now](#)

Making your SurePay repayments

A SurePay plan can help you better manage your debt, but it does not replace your minimum monthly repayments. By making your minimum monthly repayments on time you will avoid late payment fees.

All the details of your plan including your monthly instalment amount and due date, will be shown on your next monthly statement after you set up a SurePay plan.

We know that your circumstances can change. At any time, you can pay off or cancel your plan early with no penalty.

Other ways we can help



Switch your card – If you're unsure your credit card is suitable for your needs and would like to change to a different card, find out how [here](#). Compare our credit cards using our card comparison tool [here](#) or speak with us to discuss your options.



Financial assistance – If you're in need of financial assistance we can help. Request assistance online [here](#).



Discover your financial wellbeing – Answer 10 quick questions to help you understand your current financial wellbeing and see steps you can take to improve it [here](#).

Yours sincerely,
The CommBank Team

Things you should know:

You won't be able to apply for a SurePay plan if you don't meet our criteria (e.g. have currently exceeded your limit or are in default). SurePay plans are not available on CommBank Neo Cards, StepPay, non-Awards Business Cards, for balance transfers or Great Rate transactions.

*Interest savings based on \$7,000 SurePay card balance plan at 14% p.a. compared to the standard APR of 19.74% p.a. over 36 months on Low Fee or Low Fee Gold cards, this is an example and indicative figure only.

¹The 14.00% p.a. interest rate offer is available when you convert your card balance from \$600 or more into a SurePay plan for 12, 24, 36 or 48 months before 30 April 2023 and make the instalment payment each month. The 14.00% p.a. interest rate is only available for card balance plans and not Purchase or Cash Advance plans.

The terms of the Credit Card Conditions of Use relating to SurePay plans (section 5) will apply. While you have a SurePay plan, we apply your credit card payments first to your current monthly instalments. This will apply even when you have other card balances with a higher interest rate, such as cash advances and purchases not on a plan.

Any interest-free period on purchases will no longer apply once the purchase is put on a plan.

You can cancel your SurePay plan at any time. When a cancellation is processed, the outstanding instalment balance will be transferred to your purchases balance (or cash advances balance for cancelled cash advance plans) and accrue interest from the transfer date at the standard purchase or cash interest rate applicable on your account.

If you miss a monthly payment your plan won't be cancelled and you can continue to make any remaining monthly payments due up to the end of your chosen term. However, if you miss an instalment payment in a statement period, the unpaid amount will be transferred to your purchases balance (or cash advances balance if the instalment plan was a cash advance plan). It will then accrue interest at the purchases (or cash advance) rate.

This email contains important information or updates about your service and as such you cannot unsubscribe from these types of messages.


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Attachment B – examples of CBA templates

CBA.0108.0009.0120

[View online](#)



Missing out on CommBank Yello benefits? That's a shame

%%=(@Salutation)=%%

You know when you turn the brightness right down on your phone, and everything looks a bit grey? Well, it looks like you've done exactly that with your banking. You see, you're no longer eligible for CommBank Yello benefits - the bright side of banking.

Maybe you didn't realise. Or maybe you're just in the dark about all of the great benefits you could get with CommBank Yello. Check them out [here](#).

The good news is you can put the brightness back into your banking by regaining eligibility and completing 5 transactions per month from one of your eligible CommBank accounts or credit cards (pending transactions don't count - sorry!).

So come back to the bright side.

CBA.0108.0009.0120_0001

Yours brightly,
The CommBank Yello Team

Just a reminder...there are some important things you should know: %%[IF @Var_Value_1 == "" THEN]%%

- We have to publish your first initial, surname & state (e.g. A. Citizen NSW) on our website if you win the cash prize draw.
- Cashbacks and prize draw winnings will be paid into a joint account, if you don't have an eligible single account.
- To opt out of CommBank Yello (which would make us sad), please message us in the [CommBank app](#) or visit your local branch.

For more information (including tax considerations) please visit our Terms and Conditions [here](#).

%%[ENDIF]%% %%[IF @Var_Value_1 == "Y" THEN]%%

- We have to publish your first initial, surname & state (e.g. A. Citizen NSW) on our website if you win the cash prize draw.
- Cashbacks and prize draw winnings will be paid into a joint account, if you don't have an eligible single account.
- To opt out of CommBank Yello (which would make us sad), message us in the [CommBank app](#) or contact your Broker.

For more information (including tax considerations) please visit our Terms and Conditions [here](#).

%%[ENDIF]%%

Things you should know:

This email contains important information or updates about your service and as such you cannot unsubscribe from these types of messages.

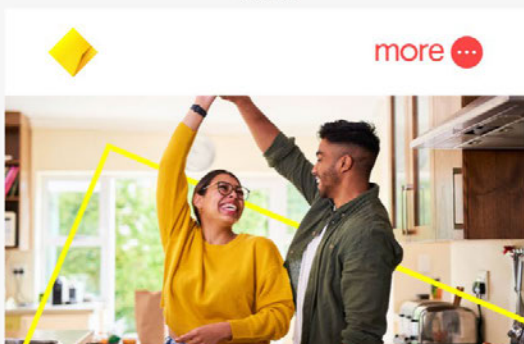
This email was sent from an address that cannot accept incoming email. To contact us, please visit the [Contact Us](#) section of our website.

To see how we protect your information, view our [Privacy Policy](#).

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%%[if
_messageContext != %%[endif]%%
"VAWP" then]%%
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An offer to help you celebrate your new property.

%%=v(@Salutation)=%%

Congratulations on the settlement of your home loan.

To say thanks for choosing us we're giving you a free nbn™ plan for 3 years. That's up to \$2,772 of value for free with our partner More.

Your unique offer code is %%=v(@Var_Value_1)=%%. Claim by %%=v(@Var_Value_7)=%%.

[Claim offer](#)


Things you should know:


*Offer of \$77/mth off the More XL Speed Boost nbn™ plan standard price for 3 years is for customers with conditional pre-approval of an eligible home loan who then find a property and fund \$250,000 or more between 31 May 2022 and %%=v(@Var_Value_5)=%%. Offer is not available for Construction Loans. Offer must be claimed by %%=v(@Var_Value_7)=%%. Customers may upgrade to a faster More nbn™ plan at any time, in which case the customer must pay the additional plan fees above the \$77/mth discount. If a customer wishes to select a cheaper plan, they will pay \$0/mth for 3 years but will not receive a cashback for the difference. If the More XL Speed Boost nbn™ or any plan of the customer's choosing has its features or pricing changed, customers will be notified. In the event that the customer's plan of choice is no longer available, they will be notified and switched over to a comparable More nbn™ plan with terms and pricing closest to their existing plan and the offer will be applied to that plan. The offer may not apply in conjunction with other offers or discounts. Limit of one offer code per borrowing entity (e.g. individual, joint borrowers, company) and per customer. Limit of one offer code per joint application. Customers must maintain their home loan with CommBank and have a CommBank credit card or debit card to use the discount. This offer does not have to be used at the property that is being funded, the customer can choose to use the discount at any address where a More nbn™ service is confirmed as available. The promotional period commences from the day that your nbn™ service is activated on the nbn™ network. After 3 years the cost of your plan will revert to the Recommended Retail Price (RRP) current at that time. The RRP of More nbn™ plans are subject to change. The offer does not apply in relation to any modem charges, nbn™ New Development Fee or nbn™ New or Subsequent Copper Line charges or any fees in respect of additional services or usage. If you sign up, More will be your service provider for your nbn™ and will handle all technical enquiries, complaints and servicing. The provision of your nbn™ will be subject to More's standard terms of service and policies, which are available [here](#) on the More website. We reserve the right to withdraw or substitute this offer at any time.


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The details

 XL Speed Boost nbn™ plan (usually \$77/mth standard price but reduced to \$0/mth for 3 years with this offer)

 Includes a free standard connection, unlimited data and no lock-in contract

 If you wish to upgrade to a bigger nbn™ plan, you still get the \$77/mth discount and will only need to pay the difference

 If you wish to select a cheaper plan, you'll pay \$0/mth for 3 years but won't receive a cashback for the difference

How to activate your free nbn plan

1. Click 'Claim Offer' in this email
2. Select the nbn™ plan of your choice and your unique offer code will reduce the cost by \$77/mth
3. Complete the online sign up by linking your CommBank debit card or credit card

[Claim offer](#)

Yours sincerely,
The CommBank Team

more 

Proud partner



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Points balance:
member

Points balance:
%

Your points balance value:



Myer & Flight Centre value



Gift Card value



Cash back value

Balance as at

Balance as at

Salutation

"Diamond Awards" OR "Ultimate Awards"

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Yours sincerely,

The CommBank Awards Team

Pay with your points at Myer's Mid-Season Sale

Pay with your points at Myer's Mid-Season Sale



Shop the Myer Mid-Season Sale and save up to 40% off selected home decor along with other great offers. Valid from Wednesday 8 March to Sunday 2 April 2023 or until stocks last. You can even use your points to pay.

It's easy to pay with points

Pay with Points online

1. Visit Myer.com.au
2. Select your items and add to bag
3. Select CommBank Awards on the payment page and follow the prompts

Pay with Points in-store

1. Choose your purchase from any Myer store
2. Present your Awards credit card to a Myer team member when you pay at a register, and ask to pay with points.

Don't have enough Awards points?

Use the points you have and pay the rest with your Awards credit card.

[Shop now](#)

"Diamond Awards" OR "Ultimate Awards"

Yours sincerely,
The CommBank Awards Team

"Diamond Awards" AND "Ultimate Awards" AND "Weekly"

Save 5% on AmpolCash for a limited time



Last chance to get 5% off when you redeem your points for \$25, \$50 or \$100 AmpolCash physical Gift Cards between 15 March and 31 March 2023.*

[Log on to redeem](#)

Yours sincerely,
The CommBank Awards Team

%%[ENDIF]%% %%[IF @Var_Value_10 != "Diamond Awards" AND @Var_Value_10 != "Ultimate Awards" AND @Var_Value_3 != "Weekly" THEN]%%

Don't forget, you can get 10,000 bonus Awards points



Over the phone by calling 1300 165 033 or



In-store at Flight Centre

Yours sincerely,
The CommBank Awards Team

%%[ENDIF]%%

Things you should know:

The earning and redemption of CommBank Awards points are subject to the CommBank Awards Program Terms and Conditions. Awards and the number of points required for Awards are subject to change at any time without notice.

%%[IF @Var_Value_3 == "Weekly" THEN]%%

*Awards member points balance and Flight Centre, Myer and Gift Card dollar values converted from points balance value are correct as at %=@Var_Value_6=% and are subject to change without notice. Gift Card dollar value cannot be applied to Westfield Gift Cards.

%%[ELSE]%%

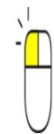
*Awards member points balance are correct as at %=@Var_Value_6=% and are subject to change without notice.

%%[ENDIF]%% %%[IF @Var_Value_10 == "Diamond Awards" OR @Var_Value_10 == "Ultimate Awards" THEN]%%

*Mastercard and the circles design are registered trademarks of Mastercard International Incorporated. Mastercard Travel Rewards are only available through participating merchants outside Australia. To receive the advertised cashback, pay with your eligible Mastercard at a participating overseas merchant and meet the offer's terms and conditions. You must pay in the overseas currency of the offer - transactions made in Australian dollars are not eligible. Cashbacks may take up to 30 days to appear



If you haven't already booked your next adventure, get in today and earn 10,000 bonus Awards points with new Flight Centre bookings over \$4,500 between 1 March and 4 April 2023.*



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on your statement. Visit mtr.mastercardservices.com for a list of participating merchants and to find out more.

%%[ENDIF]%% %%[IF @Var_Value_10 != "Diamond Awards" AND @Var_Value_10 != "Ultimate Awards" AND @Var_Value_3 == "Weekly" THEN]%%

***Ampol Gift Cards:**

Offer only valid on Gift Cards redeemed between 15 March and 31 March 2023 inclusive. We reserve the right to close the offer prior to 31 March 2023. For full partner terms and conditions see commbankawards.com.au/partnerTermsConditions.

%%[ENDIF]%% %%[IF @Var_Value_10 != "Diamond Awards" AND @Var_Value_10 != "Ultimate Awards" AND @Var_Value_3 != "Weekly" THEN]%%

***Flight Centre 10,000 Bonus Points offer:**

A minimum spend of \$4,500 applies, not including any points redeemed. Offer is only valid for new bookings made online at flightcentre.com.au, in-store at Flight Centre or over the phone by calling 1300 165 033 between 1 March and 4 April 2023. 10,000 Bonus Points is limited to one per booking. Customer must use their CommBank Awards credit card online at flightcentre.com.au, in-store at Flight Centre or over the phone by calling 1300 165 033 to qualify for Bonus Points. If the transaction/booking results in a refund or is cancelled, no Bonus Points will be earned.

%%[ENDIF]%%

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