

## DOCUMENT CONTROL

### Endorsement

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## Version Control

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CHG 068	Credit Reporting Policy	2	04/2018	Makayla Major

# CREDIT REPORTING POLICY

## GENERAL

We respect your privacy and are committed to protecting it. We are bound by the Privacy Act 1988 and the Privacy (Credit Reporting) Code 2014 (Version 1.2) (the CR Code).

Our Credit Reporting Policy applies to:

- Lion Finance Pty Ltd (as an acquirer and credit provider) ;
- ThinkMe Finance (in processing an application for credit);
- Safe Horizons Pty Ltd (in assessing financial hardship assistance);
- Collection House Limited Pty Ltd;
- CLH Lawyers;
- CLH Business Service Pty Ltd;
- Collective Learning and Development Pty Ltd, and
- Midstate CreditCollect Pty Ltd.

## PURPOSE

The purpose of the CLH Group companies' Credit Reporting Policy is to inform you about how companies of the CLH Group manage your credit information and credit eligibility information.

## CREDIT INFORMATION AND CREDIT ELIGIBILITY INFORMATION

“Credit information” includes personal information such as:

- **identification information** such as your name, address, date of birth and employer.
- **consumer credit liability information** which is information about your consumer credit accounts.
- **repayment history information** which is information about whether or not you made your monthly repayments on time.
- a note that an **information request** has been made with a credit reporting body to access your credit file.
- the type of consumer credit or commercial credit, and the amount of credit, sought in a loan application by you.
- **default information** which is a credit default that may be included on your credit file if you have a payment that is more than 60 days overdue.
- **payment information** which is a notation added to your credit default that it has been paid.
- **new arrangement information** which is a notation added to your credit default indicating that the terms and conditions around the repayment of the amount due has been varied.
- **court proceedings information** which is a judgment or order that has been made against you.

- **personal insolvency information** which is whether you are bankrupt or subject to a personal insolvency agreement.
- **publicly available information** about you:
  - i. that relates to your activities in Australia or the external Territories and your credit worthiness; and
  - ii. that is not court proceedings information about your or information that is entered or recorded on the National Personal Insolvency Index; or
- the opinion of a credit provider that you have committed a **serious credit infringement** in relation to consumer credit.

“Credit eligibility information” means information such as credit information that is disclosed to a credit provider by a credit reporting body, as well as information that is derived from this information.

## **KINDS OF CREDIT INFORMATION COMPANIES OF THE CLHGROUP COLLECT AND HOLD,**

The kinds of credit eligibility information we collect and hold about you include:

- identification information;
- consumer credit liability information;
- repayment history information;
- information request;
- default information;
- payment information;
- new arrangement information;
- court proceedings information;
- personal insolvency information;
- publicly available information; and
- serious credit infringement information.

## **HOW COMPANIES OF THE CLHGROUP COLLECT CREDIT INFORMATION**

Companies of the CLH Group collect this information from:

- you or your authorised representative during the course of our dealings with you, which includes the transactions you make (or do not make) with us and actions that we may take such as initiating legal action;
- from your credit providers when we purchase a debt from them (or are considering purchasing a debt from them);
- from a potential credit provider when we are assisting you with a financial solution such as assisting with a loan application; and
- credit reporting bodies.

## **CREDIT REPORTING BODIES AND YOUR PERSONAL INFORMATION – NOTIFIABLE MATTERS**

This statement complements our Credit Reporting Policy and provides information on the credit reporting bodies to whom we may disclose your credit information as well as information on certain rights you have in relation to your credit information.

Our handling of credit information is regulated by the Privacy Act 1988 (Cth) ('Privacy Act') and the Privacy Credit Reporting Code.

### **Credit Reporting Policy**

Our Credit Reporting Policy is available on the Privacy section of our website, [www.collectionhouse.com.au](http://www.collectionhouse.com.au). This policy provides information on our management of your credit information, including:

- your right to access the credit information we hold on you;
- your right to seek the correction of credit information that we hold on you;
- your right to complain about a breach by us of the credit reporting provisions of the Privacy Act or the CR Code and how we will deal with such a complaint; and
- entities outside Australia to which we are likely to disclose your credit information and the countries where they are located.

### **What is credit information?**

Credit information is personal information that has a bearing on credit that has been provided to you or that you have applied for. This includes credit for personal, domestic or household purposes and credit in connection with a business. It can also cover information about you as a guarantor of a loan or as an insured party under a credit related insurance policy.

### **Credit reporting bodies and your personal information**

Credit reporting bodies are allowed under the Privacy Act and the Credit Reporting Code to handle personal information relating to credit. If you apply for any kind of credit or offer to act as guarantor, we may disclose your personal information to, or collect personal information about you from, a credit reporting body. This information is used for the purpose of determining your eligibility for credit, and we may process the information to create an unsuitability assessment or other ratings of your suitability for credit.

Credit reporting bodies may include your personal information in reports that they provide to credit providers to assist those providers in assessing your credit worthiness (such as when you have applied for a loan from the provider).

The credit reporting bodies we deal with are:

- Equifax - [www.equifax.com.au](http://www.equifax.com.au);
- Dun & Bradstreet/Illion - [www.dnb.com.au](http://www.dnb.com.au);
- Experian - [www.experian.com.au](http://www.experian.com.au).

For contact details and information on how credit reporting bodies manage credit related personal information, please see their privacy policies available at the links above. Credit reporting bodies offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called "credit prescreening".

You have the right to request that the credit reporting bodies do not use your information for this purpose. To opt out of credit pre-screening, contact the credit reporting body, using the contact details on their websites noted above. You can also ask a credit reporting body not to use or disclose your personal information for a period if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

The Privacy Act and the Credit Reporting Code limit what we can do with the information we obtain from a credit reporting body. Generally, it can only be used in relation to the consumer

credit products you hold through us. For example, if you fail to meet your payment obligations in relation to consumer credit, or commit a serious credit infringement, we may be entitled to disclose this to a credit reporting body.

## **KINDS OF CREDIT ELIGIBILITY INFORMATION COMPANIES OF THE CLHGROUP HOLD**

The kinds of credit eligibility information CLH Group companies hold about you includes credit information (of the kind listed above) that is disclosed to the CLH Group companies by credit reporting bodies.

## **HOW CLHGROUP COMPANIES HOLD YOUR CREDIT INFORMATION AND CREDIT ELIGIBILITY INFORMATION**

We understand that the security of your credit information and credit eligibility information is important to you so the CLH Group companies take steps to protect it from misuse, interference, loss and from unauthorised access, modification or disclosure that include:

- training all the CLH Group companies' staff on the appropriate handling of personal information; and
- restricting access to the CLH Group companies computer systems, physical records and premises to authorised persons; and
- protecting the CLH Group companies technology environment with appropriate security measures such as firewalls and encryption.

Companies of the CLH Group take steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose. If CLH Group companies inadvertently come into possession of credit information and credit eligibility information that is not relevant to CLH Group companies' functions or activities, companies of the CLH Group will destroy that information.

## **THE KINDS OF INFORMATION CLHGROUP DERIVE FROM CREDIT REPORTING INFORMATION**

The kinds of information CLH Group derive from credit reporting information are your updated identification information such as your name, address and employer, and information about whether or not you have met your obligations with credit providers.

## **PURPOSES THAT CLHGROUP COLLECT, HOLD, USE AND DISCLOSE CREDIT INFORMATION AND CREDIT ELIGIBILITY INFORMATION**

Companies of the CLH Group collect, hold, use and disclose your credit information and credit eligibility information so that companies of the CLH Group can undertake CLH Group companies functions and activities efficiently and effectively.

CLH Group companies' functions and activities include purchasing debts from creditors such as banks and utility providers, recovering debt, and offering financial solutions such as credit products.

## **ACCESSING YOUR CREDIT ELIGIBILITY INFORMATION CLHGROUP HOLD**

You can request access to your credit eligibility information by submitting a completed Credit Information Request Form and a copy of your driver's licence or another form of government identification document to CLH Group companies' Resolutions Team. The Credit Information Request Form is available on CLH Group companies' website or by contacting CLH Group companies' Resolutions Team. Companies of the CLH Group will provide you with a copy of your credit eligibility information within a reasonable period after the request is made, usually within 30 days.

In some cases, companies of the CLH Group may charge a reasonable fee to provide access to your credit eligibility information, but CLH Group companies will never charge you to make a request. If a fee will apply, CLH Group companies will advise you before companies of the CLH Group provide access.

In certain circumstances companies of the CLH Group are permitted to withhold or limit access to your credit eligibility information. If this happens, companies of the CLH Group will inform you of the reasons for this where possible.

## **SEEKING CORRECTION OF YOUR CREDIT INFORMATION OR CREDIT ELIGIBILITY INFORMATION**

Companies of the CLH Group will take reasonable steps to ensure that your credit information and credit eligibility information is accurate, up-to-date, complete and relevant. If you believe the credit information and credit eligibility information companies of the CLH Group hold about you is not correct, please contact CLH Group companies' Resolutions Team. Companies of the CLH Group will provide you with a written response to your correction request within a reasonable period after the request is made, usually within 30 days.

If we are unable to correct your credit information and credit eligibility information, we will advise you of this in writing and provide the reason.

## **MAKING A COMPLAINT AND HOW COMPANIES OF THE CLHGROUP WILL DEAL WITH A COMPLAINT**

If you have any concerns about how companies of the CLH Group have managed your credit information and credit eligibility information, you can:

- speak with the customer service officer managing your matter; or
- request to speak with a manager or CLH Group companies' Resolutions Team at any time; or
- contact CLH Group companies' Resolutions Team directly; or
- contact the relevant External Dispute Resolution scheme (if applicable); or
- contact the Office of the Australian Information Commissioner.

Companies of the CLH Group take complaints seriously, and will provide a written response within 30 days.

## **RESOLUTIONS TEAM – CONTACT DETAILS**

**Email:** resolutions@collectionhouse.com.au  
**Phone:** 1800 173 355  
**Fax:** (07) 3831 6655  
**Mail:** CLH Group  
Collection House Limited  
PO Box 2247  
Fortitude Valley BC QLD 4006

## **EXTERNAL DISPUTE RESOLUTION SCHEMES**

For Lion Finance Pty Ltd, the applicable External Dispute Resolution scheme is Credit Ombudsman Service Limited:

**Website:** [www.cio.com.au](http://www.cio.com.au)  
**Phone:** 1800 138 422

For ThinkMe Finance, the applicable External Dispute Resolution scheme is Credit and Investment Ombudsman:

**Website:** [www.cio.org.au](http://www.cio.org.au)  
**Phone:** 1800 13 84 22

## **OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER**

**Website:** [www.oaic.gov.au](http://www.oaic.gov.au)  
**Phone:** 1300 363 992

Most (if not all) organisations will disclose information overseas at some point. Companies of the CLH Group take the necessary steps to protect your credit information or credit eligibility information when it is disclosed overseas. Companies of the CLH Group may disclose your credit information and credit eligibility information to our overseas subsidiaries in New Zealand and the Philippines. Companies of the CLH Group may disclose your personal information to CLH Group companies' contractors or service providers in overseas countries including the United States, New Zealand and the Philippines.

## **CHANGES TO THE COMPANIES OF THE CLH GROUP CREDIT REPORTING POLICY**

From time to time we may review and update companies of the CLH Group Credit Reporting Policy. Companies of the CLH Group will publish the current version on the CLH Group companies' website.