

Strategic Collections Credit Reporting Policy

This credit reporting policy provides information about how we collect, store and manage your credit information and credit eligibility information that you might give us in the course of applying for credit with Strategic Collections. Credit information is a type of personal information covered by Part IIIA of the *Privacy Act 1988*. It includes information that identifies you, about the amount you've borrowed, repayments, and defaults. Credit eligibility information is your credit report and credit score, and any further information that we derive from them. In this policy, we refer to credit information and credit eligibility information as "credit information". Our aim is to ensure that we manage credit information in an open and transparent way, in accordance with our obligations under the *Privacy Act 1988*, the Credit Reporting Code and the Australian Privacy Principles.

This policy should be read in accordance with our Privacy Policy, available at <https://strategiccollections.com.au/privacy-policy/> or by contacting us.

The kinds of credit information we collect and hold

When you apply for a loan, or provide a guarantee, we may collect and store the following kinds of credit information to assess (or have a related party of ours assess) your application for credit and manage your credit product:

- your identification information, such as name, address and date of birth;
- consumer credit liability information;
- financial information, including details about your income (from all sources and including government benefits), current employment status and recent history, assets, expenses and debts;
- repayment history information;
- default information;
- payment information;
- court proceedings information;
- personal insolvency information;
- a statement that an information request has been made in relation to you by a credit provider, mortgage insurer or trade insurer;
- the type of consumer credit or commercial credit, and amount, sought in an application to a credit provider and for which the provider has made an information request in relation to you;
- publicly available information about you that relates to your activities in Australia and your creditworthiness (excluding court proceedings information or other information about you that is entered or recorded on the National Personal Insolvency Index); and
- the opinion of a credit provider that you have committed a serious credit infringement in relation to consumer credit.

We may also hold credit reporting information about you that was disclosed to a credit provider under Part IIIA of the *Privacy Act 1988* or information that has been derived from that credit reporting information by a credit provider, including information about your creditworthiness such as credit scores.

How we collect your credit information

As far as practicable, we collect your credit information directly from you or from persons acting on your behalf, including when you complete our forms, call or email us or in our ongoing dealings with you. For example, we will collect information internally from your transactions in connection with credit, such as when you make payments to us. We may also collect credit information about you from publicly available sources, and in some cases, from third parties including:

- a credit reporting body;
- someone authorised by you, such as an agent, broker, accountant, solicitor, or financial counsellor;
- an employer;
- a government body;
- another financial institution; and
- our agents or related entities, in providing our products and services.

How we hold your credit information

To secure your credit information and protect it from unauthorised disclosure we:

- maintain a secure environment for storage of information in both hard copy and electronic form;
- use technology such as encryption and password protection to secure any information kept in electronic form; and
- only permit access to such information to authorised personnel only.

The purposes for which we collect, hold, use and disclose your credit information

In providing our products and services, we may collect, hold, use and disclose your credit information to:

- assess your credit application and that of any proposed guarantors of your credit;
- provide you with our products or services, or those of related entities and affiliated product and service providers;
- manage your credit contract, which may involve the use of external service providers;
- consider any application for variation of your payments whether or not on the grounds of hardship;
- collect any debt or otherwise enforce any rights whether by court proceedings or otherwise arising under your credit contract;
- participate in the credit reporting system and provide information to a credit reporting body;
- report repayment history information, which includes whether or not you have made payments when they fall due, and if not, when any overdue payments have been made.
- report financial hardship information, including information about an agreed financial hardship arrangement that you may have in place with us, which is recorded in place of repayment history information for the duration of the financial hardship arrangement.
- manage complaints and disputes;

- meet our legal requirements, including those under Australian privacy law and other laws, regulations or codes that bind us;
- assist other credit providers with the same purposes as permitted by Australian privacy law, such as disclosing credit information to them with your consent or where you have committed a serious credit infringement; and
- otherwise communicate with you for the purposes outlined above.

We may disclose your credit information to other parties as part of a process of merger, acquisition, sale of our business or our other assets and, before doing so, will give you notice and an opportunity to opt out of the provision of such information in that instance. We may also share your credit information with other related entities. If we disclose your credit information to any supplier of services to our business or to any prospective purchaser of our business, which we shall do so only if it is necessary for the purposes listed above, we shall do so in accordance with Australian privacy law, and seek assurances from those suppliers that they comply with Australian privacy law.

Whether we supply your credit information to overseas recipients

We may store your credit information in cloud or other types of networked or electronic systems. If your information is stored this way, disclosures may occur with entities located outside of Australia, including data hosting and other IT service providers located in Canada, Colombia, Europe, United States of America, India, Japan and Singapore. We may also send your personal information (including credit information) to The Philippines, where we have outsourced a functions or activity to a service provider in that country.

How you may access your credit information held by us

You may request access to your credit information held by us by identifying yourself by telephone, by post or by attaching scanned documents to an email and sending your request for access to us at:

Telephone: 1300 949 457

Email: customersolutions@strategiccollections.com.au

Postal Address: PO BOX 93, Varsity Lakes QLD 4227

If we are unable to grant you access to your credit information, we will give you our reasons in writing within a reasonable time. These may include where providing the information to you may:

- reveal personal information about another person;
- pose a threat to the health or safety of another person;
- not be permitted by law; or
- reveal internal information of a commercially sensitive nature which is not required to be disclosed to you by Australian privacy law.

How you may correct any credit information we hold about you which is incorrect

If you believe any credit information which we hold about you is incorrect, please contact us by telephone, by post, or by email, identify yourself and tell us what information which we hold about you is, in your belief, incorrect and how you want it changed.

If we cannot agree to the change to the information which you have requested, we will give you reasons in writing.

How you may complain about how we deal with your credit information

If you are not satisfied with the reasons referred to above or otherwise have any complaint about how we collect, hold, use or disclose your credit information, please contact our Privacy Officer who will then follow our Privacy Internal Dispute Resolution process. Our Privacy Officer can be contacted on 1300 949 457 or email:

customersolutions@strategiccollections.com.au

If you are not satisfied with our Privacy Internal Dispute Resolution process, you may refer your complaint to our External Dispute Resolution (EDR) scheme, the Australian Financial Complaints Authority:

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Mail: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

You may request a hard copy of this Credit Reporting Policy by contacting us.