

1. PURPOSE & SCOPE

The Fyfe Group comprises Fyfe Group Holdings Pty Ltd and its related bodies corporate. All references to 'Fyfe', 'we', 'us' and 'our' in this Credit Information Policy apply to these companies.

This policy applies in addition to our Privacy Policy which deals with our handling of personal information generally. This policy sets out details relating to our handling of personal information obtained from credit reporting bodies and other consumer credit-related personal information described below ('credit information'). This applies to all individuals who receive or request services on credit, and to any guarantors.

2. COLLECTION OF CREDIT INFORMATION

We may collect and hold any types of credit information about an individual permitted under the Privacy Act 1988 (Cth), including:

- a) your name, sex, date of birth, current address and previous two addresses;
- b) the name of your employer;
- c) your driver's licence number;
- d) that you have applied for credit, the amount and type of credit and credit limits;
- e) certain terms relating to credit arrangements;
- f) confirmation of previous requests to credit reporting bodies made by other credit providers, mortgage insurers and trade insurers;
- g) details of current and previous credit providers and start and end dates of credit arrangements;
- h) permitted payment default information, including information about related payment arrangements and subsequent repayments;
- i) information that, in our or another credit provider's opinion, suggests you have committed a serious credit infringement (that is, that you have acted fraudulently or shown an intention not to comply with your credit obligations);
- j) information about court judgments against you;
- k) publicly available information about your credit eligibility;
- l) certain insolvency information from the National Personal Insolvency Index; and
- m) any credit score or credit risk assessment indicating a credit reporting body's or credit provider's analysis of your eligibility for consumer credit.

This information is collected in a variety of ways, including by way of personal contact, mail, telephone, email and online. We may also collect and use personal information available from public sources and other third party sources such as credit reporting bodies and information service providers.

3. USE AND DISCLOSURE OF CREDIT INFORMATION

In general, Fyfe collects, holds, uses and discloses credit information to:

- a) provide our services to clients;
- b) verify your identity and personal information and manage credit arrangements;
- c) collect overdue payments;
- d) maintain and update our records and carry out other administrative tasks;
- e) deal with and assess your applications, enquiries and concerns;
- f) produce assessments and ratings in respect of your credit eligibility;
- g) detect, investigate and deal with unlawful activity and misconduct (actual or suspected); and
- h) comply with legal obligations and protect our lawful interests.

We may also use and disclose your credit information in connection with acquisitions or potential acquisitions of our business or assets, including any sale of debt.

We may exchange credit information with:

- a) service providers who have been contracted to provide administrative, financial, auditing, accounting, debt collection, legal, business consulting, banking, data processing, technology or other services;
- b) insurers, insurance investigators, courts and regulatory authorities (including the Australian Tax Office) as required or authorised by law or in accordance with their reasonable information requests;
- c) debt buyers; or
- d) your guarantors, representatives and anyone authorised by you.

The third parties described above may be located in Australia or other countries. We may also send information to our subsidiary in the Philippines.

For an up-to-date list of countries where credit information may be sent, please see the current version of this Policy, which is available on request or at fyfe.com.au

4. CREDIT INFORMATION MAY IMPACT APPLICATION FOR A TRADING ACCOUNT

Fyfe may refuse an application for a trading account based wholly or partly on your credit information. Fyfe will comply with the Privacy Act in relation to any refusal for an application for a trading account.

5. CREDIT REPORTING BODIES

We may exchange credit information with credit reporting bodies to, where permitted by law:

- a) assist those bodies to maintain information about you to provide to other credit providers for credit assessments;
- b) assess an application by you for consumer credit or commercial credit, or to be a guarantor;
- c) manage your credit;
- d) review your credit eligibility on a periodic basis or in connection with changes (e.g. credit limit) as though assessing a new application;
- e) collect overdue payments; and
- f) create assessments and ratings of your credit eligibility.

The credit reporting body we currently use is Veda Advantage, PO Box 964, North Sydney, NSW, 2060. Tel: 1300 921 621 [or www.veda.com.au](http://www.veda.com.au). Fyfe may use a different credit reporting body from time to time.

You can contact Veda or visit its website to see its policies on credit information management.

6. MANAGEMENT OF CREDIT INFORMATION

We hold credit information electronically and in hard copy, at our own premises and with the assistance of our service providers. We implement a range of measures to protect the security of that information. We will also take reasonable steps to destroy or de-identify information when it is no longer needed for any permitted purpose.

7. ASSESSING YOUR CREDIT INFORMATION

Under privacy laws, you may have the right to obtain access to credit information which Fyfe holds about you and to advise us of any perceived inaccuracy. We will consider any recommendation by you to change or correct information and advise you of the action taken. You may request access to your credit information by contacting us in accordance with Sections 8 and 9 below. Depending upon the information you seek, you may be asked:

- a) to complete an information request form;

- b) to verify your identity in writing; and/or
- c) if the inquiry involves extensive administration time or resources, to pay a fee. If this is the case, we will advise the likely cost in advance and can help refine your request if required.

Please note that in circumstances allowed by the Privacy Act, you may be refused access to or correction of your credit information (e.g., if providing access would be unlawful or would have an unreasonable impact upon the privacy of others). In these circumstances we will provide you with our reasons and if you request, note your requested correction.

8. COMPLAINTS ABOUT AN INTERFERENCE WITH PRIVACY

If you believe that Fyfe has breached this Policy or privacy laws, you can make a complaint by contacting us by a method set out in Section 8 below. We will endeavour to act promptly in response to a complaint. If you are dissatisfied with the way Fyfe is handling your complaint, you can make a complaint to the Office of the Australian Information Commissioner at www.oaic.gov.au

9. HOW TO CONTACT US AND UPDATES TO THIS POLICY

You can contact the Fyfe Group about a privacy-related issue by email or post at privacy@fyfe.com.au or Privacy Officer, level 3, 80 Flinders Street, Adelaide SA 5000.

Our Credit Information Policy will be reviewed periodically. The current version is accessible at fyfe.com.au.

10. OWNER OF POLICY

Name:	Emma Christie	Position:	General Counsel
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