

CARRABAY REO PTY LTD – CREDIT REPORTING POLICY

Carrabay Reo Pty Ltd (ABN 54 608 336 376), (**we, us, or our**) are committed to protecting the personal information we collect and hold about you (**you or your**).

This credit reporting policy (**Credit Reporting Policy**) has been developed in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Privacy (Credit Reporting) Code (**CR Code**) and explains how we collect, use, disclose and otherwise manage credit-related information.

We want you to be informed and empowered with respect to your privacy when you use our services (**Services**).

Please read this Credit Reporting Policy carefully before using our Services, including prior to you submitting a Trade Credit Application form to us.

We have the right to update this Credit Reporting Policy from time to time.

1 What is Personal Information and Credit Information?

1.1 **Personal Information** is any information or an opinion, in any form and whether true or not, about an identified individual or an individual who is reasonably identifiable.

The Personal Information we hold about you may also include Credit Information.

1.2 **Credit Information** is a term used throughout this Credit Reporting Policy and refers to “credit information”, “credit eligibility information” and “CP derived information”, as these terms are defined in the Privacy Act.

2 What Credit Information do we collect and hold and how is it collected?

2.1 If you request Services or credit from us, we may collect and hold “credit information”, “credit eligibility information” and “CP derived information”, as these terms are defined in the Privacy Act, which may include:

Credit Information, including:

- (a) your name, date of birth, address, contact number and email address;
- (b) the fact that you applied for credit from us;
- (c) the amount of credit provided to you by us (if any);
- (c) the terms of payment of credit, including and any credit term applicable to you;
- (d) details of your payment history, including details of any default of payment by you;
- (e) details of credit that was provided to you or has otherwise been discharged; and

(f) information retrieved from any credit referees; and

Credit eligibility information, including:

(e) a credit report; and

(f) a credit assessment score; and

CP derived information, including:

(g) internal credit profiles or scores we have created for you; and

(h) internal credit assessment files,

derived from credit reporting information disclosed to us.

2.2 You do not need to give us any Credit Information about you or any other person which may be requested in our communications with you. However, without that Credit Information, or if you give us incorrect or inaccurate Credit Information, we may not be able to provide you with our Services on credit.

2.4 We may also collect your Credit Information:

(a) from third parties such as CreditWatch, Dunn & Bradstreet, Equifax Australia Information Services and Solutions Ltd and similar as required (**Credit Reporting Bodies**);

(b) from publicly available resources;

(c) from other credit providers, including any credit referees provided by you; and

(d) directly from you in your application for credit from us.

You consent to us obtaining Credit Information about you from the parties named above.

3 Why we collect your Credit Information

We collect, hold and use your Credit Information for the purposes of:

(a) verifying your identity;

(b) obtaining credit reporting information from Credit Reporting Bodies;

(c) assessing your application for credit (or assessing your application to be a guarantor in relation to such credit);

(d) providing our Services to you and account administration;

(e) dealing with complaints or issues you may have in relation to us or our Services;

(f) to collect or report any debts related to any credit provided by us to you in relation to the Services; and

(k) otherwise as required or permitted by law.

4 **When do we disclose your Credit Information?**

4.1 We may disclose your Credit Information to:

(a) **Credit Reporting Bodies** in order for them to generate credit reporting information. The Credit Reporting Bodies may have separate credit reporting policies available on their websites.

(b) **Other Third Parties** who may request a credit referral from us in regards to you, external debt collectors, parties who may assist us for securitisation purposes, including any guarantors who guarantee any credit provided by you, any external party we may use to collect payment for the Services by you, any other party where you have consented and where permitted by law.

(c) **Third Party Service Providers:** We contract with service providers to perform certain functions on our behalf. Examples include database providers, IT service providers and payment system operators. Where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of Australia

(d) Anyone who represents you or where you have provided us consent.

(e) Investors, agents or advisers, or any entity that has an interest in our business.

(f) Government agencies or regulatory bodies where we are required to do so by law.

(g) Our employees, contractors and related entities.

5 **Credit Reporting Bodies**

5.1 We will not obtain any other credit reporting information about you from Credit Reporting Bodies other than your credit report and credit score. We will only hold your credit report and credit score for as long as required for the purpose under which it was provided and as set out in these terms.

6 **Notifiable matters**

6.1 The law requires us to advise you of 'notifiable matters' in relation to how we may use your Credit Information. You may request to have these notifiable matters (and this Credit Reporting Policy) provided to you in an alternative form.

6.2 We collect your Credit Information from credit reporting bodies. Credit reporting bodies include credit reporting information in reports to assist credit providers to assess your credit worthiness.

6.3 If you fail to meet your payment obligations in relation to credit or you commit a serious credit infringement, we may disclose this to the credit reporting body.

6.3 You have the right to request access to the Credit Information that we hold about you and make a request for us to correct that Credit Information if needed. You also have the right to make a complaint to us. Please see the headings "Updating and correcting your Credit Information", "access to your Credit Information" and "Complaints" below.

6.4 Sometimes your Credit Information will be used by credit reporting bodies for the purposes of 'pre-screening' direct marketing credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your Credit Information is not used in this way.

6.5 You may ask a credit reporting body not to use or disclose your Credit Information for a period if you believe on reasonable grounds that you may have been a victim of fraud.

6.6 The credit reporting bodies we deal with are CreditWatch, Dunn & Bradstreet, Equifax and similar as required. A copy of their privacy and credit reporting policies are available on their websites.

6.7 We are not likely to disclose Credit Information to entities that do not have an Australian link. If we do disclose Credit Information to entities that do not have an Australian link, we will update this Credit Reporting Policy to provide details of the countries in which these entities are located.

OTHER MATTERS

7 Security of your Credit Information

7.1 We will take reasonable steps to protect your Credit Information from misuse, loss and unauthorised access, modification or disclosure by storing it in a secure environment.

7.2 Your Credit Information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store your Credit Information (including credit reporting information) and the IT servers will be located in [Australia].

8 Updating and correcting your Credit Information

8.1 We will rely on you to ensure the Credit Information we hold about you is accurate or complete.

8.2 If any of the Credit Information we hold about you is incorrect, inaccurate or out of date you may contact us at accounts@carrabayreo.com.au and request that we correct the information.

8.3 If appropriate we will correct the Credit Information at the time of the request, otherwise, we will provide an initial response to you within a reasonable time of receiving

your request. We will provide you with details about whether we have corrected the Credit Information usually within 30 days.

8.4 We may need to consult with other credit providers or credit reporting bodies or entities as part of our investigation.

8.5 If we refuse to correct your Credit Information, we will provide you with our reasons for not correcting that information.

9 Access to your Credit Information

9.1 You may request access to any of the Credit Information we hold about you at any time by contacting us at accounts@carrabayreo.com.au. We may charge a fee for our costs of retrieving and supplying the information to you.

9.2 We respond to you usually within 30 days of receiving your request. We may need to contact other entities to properly investigate your request.

9.3 There may be situations where we are not required to provide you with access to your Credit Information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

9.4 We will provide you with an explanation if we deny you access to the Credit Information we hold about you.

10 Complaints

10.1 If you are dissatisfied with how we have dealt with your Credit Information, or you have a complaint, please contact us at accounts@carrabay.com.au

10.2 We will acknowledge your complaint usually within 7 days. We will provide you with a decision on your complaint usually within 30 days.

10.3 You also have the right to contact the relevant privacy authority.

11 Change in our Credit Reporting Policy

11.1 We may change this Credit Reporting Policy from time to time. You should regularly review this page to familiarise yourself with our updated Credit Reporting Policy.

Please check this page from time to time to take notice of any updates made to the information here.

Last update: 31 March 2021