

Privacy and Credit Reporting Policy



1 Introduction

This document is the combined Privacy and Credit Reporting Policy of RedZed Lending Solutions Pty Ltd (ABN 31 123 588 527) and its related bodies corporate (together RedZed, we or us). This policy describes how we will comply with our obligations under the Privacy Act 1988 (Cth) (Privacy Act) in relation to the handling of your Personal Information, and the credit reporting obligations contained in the Privacy Act and the Credit Reporting Code as registered under section 26S(1) of the Privacy Act.

2 Glossary of Terms

In this policy:

Credit-Related Information	means credit information, credit eligibility information and Credit Reporting Body derived information as those terms are defined in the Privacy Act. Generally speaking, Credit-Related Information will include your name and address, your contact details, your date of birth and gender, details of your credit history (including any repayments missed or late repayments that you have made), information about any credit provided to you by credit providers (such as financial institutions, utilities or telecommunications providers), any credit rating or credit assessment score that we have derived or that is provided to us by a credit reporting body and details of any credit-related court proceedings or insolvency applications that relate to you.
Credit Provider	includes financial institutions, retailers and other individuals, firms or corporations which provide credit or which provide credit in relation to the sale of products or supply of services on terms where the payment of the credit is deferred for at least 7 days.
Credit Reporting Body	is an entity that undertakes a business of collecting, holding, using or disclosing Personal Information about individuals for the purpose of, or for purposes including the purpose of, providing an entity with information about the credit worthiness of an individual.
Personal Information	has the meaning given to "Personal Information" in the Privacy Act. In general terms, it is any information that can be used to personally identify you, such as your name, address, email address and telephone number. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered Personal Information.

3 Collection of Personal Information

3.1 What Personal Information do you collect about me?

We may collect the following types of Personal Information about you:

- name;
- mailing or street address;
- email address;
- telephone number;
- facsimile number;
- age and birth date;
- gender;
- drivers licence or passport details;
- profession, occupation or job title;



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- details of the products and services you have acquired from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us via customer surveys or in telephone conversations with us from time to time.

We may also collect some information that is not Personal Information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our websites.

3.2 How do we collect your Personal Information?

We will collect your Personal Information directly from you unless it is unreasonable or impracticable to do so. When collecting Personal Information from you, we may collect in various ways, including when you:

- access or use our websites;
- speak with one of our representatives in person, or by telephone;
- send an email or fax; or
- complete an application for a loan or other credit.

We may also collect Personal Information about you from third parties including:

- from third party companies such as Credit Reporting Bodies, law enforcement agencies and other government entities;
- an authorised representative (e.g. introducer, broker, agent, accountants or solicitors);
- a referee;
- an employer;
- a government body; or
- another financial institution.

3.3 Do I have to provide my Personal Information?

When you interact with us, you will usually have to identify yourself, which will require you to provide us with your Personal Information. This is because it is impractical in most circumstances for you to remain anonymous or to use a pseudonym. We may also have an obligation, under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) or other legislation, to verify the identity of our customers.

If you do not provide us with the Personal Information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about any special offers; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

4 Use and disclosure of Personal Information

4.1 Why do you collect my Personal Information

We collect Personal Information about you so that we can perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your Personal Information for the following purposes:

- to verify your identity (including to verify information contained in documents you provide to us as evidence of your identity);
- to assess credit applications and manage credit agreements;
- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to provide you with access to protected areas of our websites;



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- to assess the performance of our websites and to improve the operation of our websites;
- to conduct business processing functions including providing Personal Information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of RedZed, its related bodies corporate, contractors or service providers;
- to update our records and keep your contact details up to date;
- to provide your updated Personal Information to our related bodies corporate, contractors or service providers;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political subdivision of a country).

4.2 Who do you disclose my Personal Information to?

We may disclose your Personal Information to:

- our employees, related bodies corporate, contractors or service providers for the purposes of operation of our websites or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers, service providers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes including to credit reporting bodies, their related bodies corporate and the third parties that they deal with in order for them to assist us to provide our services to you;
- government bodies, regulators and international bodies in Australia and overseas, where required or authorised by law, or where required for the purpose of verifying your identity or the information contained in documents you provide to us as evidence of your identity and checking whether you are a politically exposed person or otherwise subject to any Australian or international sanctions; and
- any organisation for any authorised purpose or with your express consent.

4.3 What about direct marketing?

We may send you direct marketing communications and information about our products and services or the products and services of other organisations that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications sent to you. We will then ensure that your name is removed from our mailing list.

5 Credit Reporting Policy

5.1 Application

This section 5 is RedZed's credit reporting policy. RedZed may provide Consumer Credit and/or Commercial Credit to individuals, and this policy will apply in such circumstances. We may conduct a credit check on you, any joint account holders (or for corporate customers, any directors, partners or other authorised representatives) before we provide credit to you.

The Privacy Act and this policy do not apply to Commercial Credit provided to companies or other entities. However, this policy will apply where an individual applies for Commercial Credit or we request that a director or other authorised individual guarantees the Commercial Credit to be provided by us to a company or other entity. This policy will only apply in respect of any uses of individuals' Credit-Related Information as part of our assessment of the creditworthiness of that individual or their suitability as a guarantor.

5.2 Collection of Credit-Related Information

In addition to collecting Personal Information about you, we may collect the following particular types of Credit-Related Information about you:



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- identification information (such as your name, address, previous addresses, date of birth, marital status, number of dependents, residency status, contact details, drivers licence or passport details, gender, employer, previous employers, income, financial position);
- your credit history (including type of account; date the account was open and closed, maximum amount of credit, any repayments missed or late repayments that you have made, any specific terms and conditions relating to that credit, bankruptcy history);
- your repayment history (including default information, new arrangement information);
- details of any credit provided to you by other Credit Providers (such as other financial institutions, utilities or telecommunications providers);
- any credit rating or credit assessment score that we have derived or that is provided to us by a Credit Reporting Body;
- details of any credit-related court proceedings or insolvency applications that relate to you; and
- publicly available information.

We may obtain this information from you or from third parties, including from Credit Reporting Bodies and other Credit Providers, in order to assist us in determining whether we will provide any credit to you (or to your related company or other entity).

5.3 Our use and disclosure of your Credit-Related Information

We may use the Credit-Related Information that is collected and held by us to help us decide whether or not to provide credit to you (or to your related company or other entity). We may also use this information to derive or calculate a credit assessment score in relation to you, which we will then use to help us in conducting our assessment of your creditworthiness.

The Credit-Related Information that we hold about you may be used by us in accordance with Part IIIA of the Privacy Act and the Credit Reporting Code. The purposes for which we use your Credit-Related Information may include:

- using your Credit-Related Information to assess any application that you make to us for credit (or which is made by your related company or other entity);
- using your Credit-Related Information to collect payments that are owed to us in respect of any credit that we have previously provided to you (or to your related company or other entity);
- disclosing your Credit-Related Information to any of our related companies that are also considering whether to provide credit to you (or to your related company or other entity);
- where you have offered to guarantee credit that we have offered to provide to your related company or entity, to assess your suitability as a guarantor of that credit;
- disclosing your Credit-Related Information to undertake securitisation activities and debt assignments;
- disclosing your Credit-Related Information for internal management purposes or data analysis;
- disclosing your Credit-Related Information to a third party that you or we ask to act as a guarantor of any credit provided to you;
- disclosing your Credit-Related Information to the Credit Reporting Bodies that we deal with, including illion Data Registries Pty Ltd (whose contact details are available at www.illion.com.au/contact-us Equifax Australia Information Services & Solutions Pty Ltd (whose contact details are available at <https://www.equifax.com.au/contact>), and Experian Australia Credit Services Pty Ltd (whose contact details are available at www.experian.com.au/contact-us/). Credit Reporting Bodies collect different types of Credit-Related Information about individuals and use that information to provide a credit-related service to their customers (including to us). These Credit Reporting Bodies may collect, hold, use and disclose your Credit-Related Information in order to provide, among other services, consumer and commercial risk assessment services including identity verification and evaluations of your credit and lending risk;
- disclosing your Credit-Related Information to other third parties that provide services to us (or to you on our behalf). These might include debt collectors, credit management agencies and other third parties that process applications for credit made to us;
- disclosing your Credit-Related Information to other Credit Providers which provide, or are considering providing, credit to you (or to your related company or other entity);
- using and disclosing Credit-Related Information that we hold about you to assess and respond to any access or correction requests that you make to us;
- where we are consulted by a Credit Reporting Body or another Credit Provider about an access or correction request that you have made to those entities, to respond to that consultation request;
- where you complain to the Information Commissioner or any provider of a recognised external dispute resolution scheme about our treatment of your Credit-Related Information, to respond to that complaint and to seek legal or other professional advice in relation to your complaint;



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- using and disclosing Credit-Related Information that we hold about you as required by law or the order of a court or tribunal; and
- where you otherwise expressly consent to the use or disclosure.

5.4 Other matters relating to your Credit-Related Information

Where required by law, we will make a written note (which may be kept in electronic form) of any use or disclosure that we make relating to your Credit-Related Information.

If:

- you (or your related company or other entity) make an application for credit to us; or
- you offer to guarantee credit that we propose to provide to your related company or other entity,

and we subsequently refuse your application or offer based on information provided to us by a credit reporting body about you, we will inform you of this and provide you with the name and contact details of that body and any other information required by law to be provided to you.

5.5 Access and correction

You have a right to request access to, or the correction of, any Credit-Related Information that we hold about you. You may do this in accordance with section 8 of this policy.

5.6 Complaints

You may complain about any failure by us to comply with Part IIIA of the Privacy Act or the Credit Reporting Code. If your complaint relates to our failure to provide access to or to correct any Credit-Related Information that we hold about you, you may lodge a complaint directly with the Office of the Australian Information Commissioner (for more information, please see www.oaic.gov.au) or a provider of a recognised external dispute resolution scheme as notified by us. If your complaint does not relate to these matters, you must first lodge a complaint with us in accordance with the procedure set out in section 9 of this Privacy Policy, which sets out how we will deal with such complaints.

If you make a complaint in relation to correction of your Credit-Related Information, we will notify each other credit provider and credit reporting body to which we have previously disclosed that information that you have made a correction complaint in relation to that information and the outcome of that complaint, unless it is impracticable or illegal for us to do so.

5.7 National Consumer Credit Protection compliance

As a part of our requirements under the National Consumer Credit Protection Act, we will ensure that credit checks are performed on all loan applicants and guarantors.

6 Our websites

6.1 Application

This policy also applies to the use of our websites at www.redzed.com and www.thexyed.com (“websites”).

6.2 Cookies

When you access our websites, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our websites without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online products and services. Our cookies do not collect Personal Information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the websites, track users movements, and gather broad demographic information.

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6.3 Security

As our websites are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any Personal Information or other information which you transmit to us online is transmitted at your own risk.

6.4 Links

Our websites may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

7 Security, quality and location of your information

We take reasonable steps to ensure that the Personal Information and Credit-Related Information that we collect, use and disclose about you is accurate, complete and up-to-date and, in relation to the purpose of our use or disclosure, relevant. Personal Information and Credit-Related Information is destroyed or de-identified when no longer needed or where we are no longer required by law to retain it (whichever is the later).

We store information in different ways, including in hardcopy and electronic form. We have implemented controls around technology and our organisational processes to assist us in protecting your information from misuse, interference and loss and from unauthorised access, modification or disclosure. This includes having in place confidentiality requirements for employees and contractors, as well as implementing document storage security policies, systems and site access restrictions.

We may disclose Personal Information and Credit-Related Information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your information do not breach the privacy obligations relating to your information. We may disclose your information to entities located outside of Australia so that your Personal Information and Credit Related Information may be held in the United Kingdom, Japan, United States, New Zealand, India, Mexico and Germany.

8 Access and Correction Requests

You may request access to any Personal Information or Credit-Related Information that we hold about you at any time by contacting us (see the details below in section 10). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your Personal Information.

There may be instances where we cannot grant you access to the Personal Information or Credit- Related Information that we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that any Personal Information or Credit-Related Information that we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment.

For any Personal Information that we do not agree to correct, you may request that we add a note to the Personal Information stating that you disagree with it.

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For any Credit-Related Information, we will:

- respond to your request within 30 days (or such longer period as you may agree or we may request). If we cannot respond to your correction request without consulting with other Credit Providers or Credit Reporting Bodies in relation to your request, we may do so and these bodies are permitted by law to assist us in resolving your correction request; and
- if we agree to your request, promptly correct any Credit-Related Information that we hold about you that we are satisfied is inaccurate, out-of-date, incomplete, irrelevant or misleading. If we do correct your Credit-Related Information at your request, we will inform you and each other credit provider and credit reporting body to which we have previously disclosed that information that we have corrected your information. Where we disclosed your Credit-Related Information after you made a complaint but before it was resolved, we will tell the recipient that you have made such a complaint and we will subsequently inform that entity of the outcome of your correction request.

If we have any other reasons for suspecting that Credit-Related Information that we hold about you has become inaccurate, out-of-date, incomplete, irrelevant or misleading, we may independently decide to correct this information without consulting you. If we do this, we will take reasonable steps to notify that correction to you and to any other entities to which we have previously disclosed that Credit-Related Information (unless it is impracticable for us to do so).

9 Complaints / Dispute Resolution:

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

If your complaint relates to our failure to provide access to or to correct any Credit-Related Information that we hold about you, you may lodge a complaint directly with the Office of the Australian Information Commissioner (for more information, please see www.oaic.gov.au) or to the Australian Financial Complaints Authority (www.afca.org.au), who is an independent external dispute resolution provider that can also deal with complaints relating to Credit-Related Information.

Otherwise, if you have a complaint in relation to our handling of your Credit-Related Information that is not mentioned above or if your complaint relates to your Personal Information, you must first lodge your complaint with us using the details in section 10 (Contacting us) below and provide us with details of the incident so that we can investigate it.

We will use our established Internal Dispute Resolution process (www.redzed.com/faqs/) to investigate and deal with privacy breaches.

We will treat your complaint confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

If you are not satisfied with our handling of your complaint or our proposed resolution, you have a right to lodge a further complaint with the Office of the Australian Information Commissioner (for more information, please see www.oaic.gov.au). The Office of the Australian Information Commissioner can provide you with further information about the next steps in its complaints process. If your complaint relates to Credit-Related Information that we hold about you, you may instead lodge your further complaint with the provider of a recognised external dispute resolution scheme as notified by us.

Where your complaint relates to the correction of your Credit-Related Information and the resolution of your complaint requires us to correct your information, we will inform each other Credit Provider and Credit Reporting Body that we have previously disclosed your information to that that you have made a correction complaint in relation to that information and that we have corrected your information as a result of the outcome of that complaint. However, if it is impracticable or illegal for us to do so we are not required by law to give this notification.

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10 Contacting us

If you have any questions about this policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Compliance Officer using the details set out below.

Post: Compliance Leader
RedZed Lending Solutions Pty Ltd
GPO Box 1693, Melbourne, 3001

Tel: 1300 722 462

Fax: 1300 722 097

Email: info@redzed.com

11 Changes to our privacy and credit reporting policy

We may change this privacy and credit reporting policy from time to time. Any updated versions of this privacy policy will be posted on our websites. This privacy policy was last updated on 24 June 2021.