

Credit Reporting Policy

We are a 'Credit Provider' for the purposes of the Privacy Act 1988 (Cth) and are bound by the credit reporting provisions in the Privacy Act and the Credit Reporting Code registered under that Act.

Purpose of this Policy

This policy provides you with information about how we collect, use, disclose and manage the following information:

- **Credit Information:**
This information relates primarily to your credit-related dealings with us. We can disclose this information to Credit Reporting Bodies; and
- **Credit Eligibility Information:**
This information relates primarily to your credit-related dealings with other Credit Providers. Credit eligibility information comprises of:
 - *Credit Reporting Information* provided by Credit Reporting Bodies; and
 - *Credit Worthiness Information* that we derive using Credit Information.

In this policy we refer to Credit Information and Credit Eligibility Information collectively as **Credit-Related Information**.

You should review this policy periodically as we may modify it from time to time. If you would like a hardcopy of this policy, please contact us at info@gmckay.com.au.

This policy applies only in relation to individuals. It does not apply to the collection or use of information about corporations.

You should read this policy in conjunction with our Privacy Policy which can be obtained online at www.gmckay.com.au/privacy-policy or in hardcopy by contacting us at info@gmckay.com.au

Types of Credit-Related Information Collected

We collect and hold the following types of Credit-Related Information:

- **Identification Information**
Information such as your name, address, tax file number, date of birth and employer details.
- **Consumer Credit Liability Information**
Information about the type and amount of credit you have obtained and the terms upon which it was obtained.
- **Repayment History Information**
Information about whether or not you have made any payment that was due in a particular month, and where a payment was overdue, when it was ultimately paid.
- **Default Information**
Information about a payment owed by you as a borrower or guarantor in connection with consumer credit that remains overdue for more than 60 days and which we can, in certain circumstances, disclose to a Credit Reporting Body.

- **Court Proceedings Information**
Information about a judgment of an Australian court that is made against you that relates to credit that was provided to, or applied for, by you.
- **Personal Insolvency Information**
Information relating to any bankruptcy agreements you have entered into or a direction given, or an order made, under the Bankruptcy Act that relates to you.
- **Serious Credit Infringement**
A reasonable opinion that you have committed a serious credit infringement in relation to consumer credit that was provided to you (e.g. fraud).
- **Credit Scores**
Information about your credit worthiness, such as credit scores, credit risk ratings, summaries and evaluations.

Collection

We will collect Credit-Related Information from the following sources where it is lawful, reasonable and practicable to do so:

- **Information derived from you during our normal business dealings when you:**
 - speak to us in person or during a telephone call with our staff;
 - complete a credit application or other form (in hardcopy or electronically); or
 - transact with us, such as when you make payments to us; and
- **Information from third parties such as:**
 - Credit Reporting Bodies;
 - other Credit Providers; and
 - your employer, accountant, solicitor or other personal representative.

Why we Collect Credit-Related Information

We collect your Credit-Related Information in order to:

- assess your creditworthiness;
- determine payment terms for the goods that we will provide to you;
- carry out the day to day administration of your account;
- satisfy our legal obligations; and
- deal with complaints.

We also collect Credit-Related Information about you if we are required to do so by law. In such a case we will inform you that the collection is required, including details of the relevant law requiring the collection.

Disclosure

We may disclose Credit-Related Information to third parties, but only if it is lawful, reasonable and practicable to do so. Third parties that we may disclose such information to include:

- **Credit Reporting Bodies**

We may disclose Credit-Related information about you to Credit Reporting Bodies and debt collection companies where you are in payment default. We will only make a disclosure in these circumstances if we have given you written notice of our intention to disclose and at least 14 days has passed since giving such notice.

- **Our Related Companies**

We may disclose your Credit-Related Information to our related companies for our business administrative or reporting purposes.

We take will reasonable steps to ensure that the overseas recipients of your Credit-Related Information comply with the privacy obligations under the Privacy Act.

Safekeeping

We take reasonable and appropriate physical and electronic security measures to keep Credit-Related Information we hold secure. This includes protection from misuse, interference, loss and unauthorised access, modification or disclosure.

If the Credit-Related Information is in hard copy, we secure it in locked filing cabinets or storage facilities.

If the Credit-Related Information is in electronic form, access is restricted by various security methods and controls including fully managed firewalls, anti-virus and intrusion detection, user access restrictions/role based permissions, penetration and vulnerability testing and restricted access facilities.

Accessing or Correcting Credit-Related Information

Please notify us if you believe any Credit-Related Information we hold about you is inaccurate, outdated or incomplete so it can be corrected. There is no cost to do so.

You are entitled to access your Credit-Related Information held by us. You can make a request for access by email to info@gmckay.com.au .We will respond to the request within a reasonable period of time.

There may be reasons why we deny access, including where:

- access would be unlawful or likely to prejudice enforcement related activities;
- access would disclose a commercially sensitive decision making process;
- providing access would create an unreasonable impact on the privacy of others;
- the requested information relates to existing or anticipated legal proceedings with you;
- providing access would prejudice negotiations with you;
- providing access would pose a serious threat to life, health or safety to any individual or to the public in general;
- the request is frivolous; or
- denial of access is otherwise authorised by law.

You are permitted to keep your identity anonymous or use a pseudonym when you contact us. However, we will not release any information without sufficient proof of identity.

We may charge a fee to cover the reasonable cost of meeting a request to access information.

Complaints

Any complaints relating to our handling of your Credit Reporting Information can be made to the Managing Director by email to info@gmckay.com.au. If you do not consider that your complaint is adequately dealt with by us, you may make a further complaint to the Office of the Australian Information Commissioner, which has complaint handling responsibilities under the Privacy Act.

Policy Authorised by the Managing Director



Date:

9/6/17

Gavin McKay
Managing Director