

Credit Information Management Policy

Vantage Performance Group Pty Ltd
ACN 136 691 435
("Vantage")



Table of Contents

1.	About this policy	1
2.	Collection	1
3.	Purposes of collection, use and disclosure	2
4.	Disclosure	2
5.	Overseas disclosure.....	3
6.	Storage method.....	3
7.	Access and correction	3
8.	Complaints	4
9.	Statement of Notifiable Matters under the Credit Reporting Privacy Code.....	5
10.	Changes to our Credit Information Management Policy.....	5
11.	Contact.....	5



1. About this policy

Vantage Performance Group Pty Ltd ACN 136 691 435 (“Vantage”) (“our”, “us” or “we”) (“businesses”) and its related companies respect your privacy. We are committed to protecting the personal information we collect from you in accordance with Australian law.

This policy explains how we handle your credit information when we collect it from you. Our management of this information is governed by the *Privacy Act 1988 (Cth)* (‘Privacy Act’), the *Privacy Regulation 2013* (‘Regulations’) and the Credit Reporting Privacy Code (‘CR Code’).

2. Collection

2.1. Kinds of information collected

- (a) Under the Privacy Act, if you engage our services you may be viewed as applying for credit from us, in the form of us providing services and/or products for you and allowing you more than 7 days to pay the debt for such services and/or products.
- (b) If you apply for credit from us or our related companies we may collect and use all types of ‘credit information,’ as that term is defined in the Privacy Act.
- (c) Credit information is personal information that has a bearing on credit that you have applied for or obtained from us. It also extends to information about you as a guarantor of any credit provided by us.
- (d) This information includes:
 - (i) Identification information;
 - (ii) The fact that you have applied for services from us;
 - (iii) The fact that we are a credit provider to you;
 - (iv) Your employment, income, expenses and savings;
 - (v) Your past experiences with us and other lenders;
 - (vi) Any hardship application you have made;
 - (vii) Credit reports from credit reporting bodies (“CRB”) about your creditworthiness;
 - (viii) Payment defaults.
- (e) In certain circumstances permitted by the Privacy Act, we may disclose this information to a CRB (such as Equifax or Dun and Bradstreet).
- (f) We may collect, use or disclose credit information collected by credit providers (“CI”) and CI produced by CRBs (collectively referred to as “CP derived information”).



2.2. Method of collection

- (a) We will normally collect your credit information directly from you. This may be in our meetings with you, over the telephone, through our inquiry/application forms and processes both online and in hardcopy, or via our email communications with you.
- (b) If you apply for credit or give a guarantee for credit from us, we may request identification information. This could include your name, contact details and date of birth.
- (c) On occasion we may internally collect credit information about you, without your direct involvement, about your previous experiences with us particularly how you have managed your obligations.
- (d) We may also collect credit information about you from third parties, without directly involving you, in circumstances permitted by the Privacy Act. For example we may seek credit information about you from:
 - (i) Our associated entities;
 - (ii) Publicly available sources of information, such as public registers;
 - (iii) Your representatives, including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney; your employer; and
 - (iv) Other organisations, which provide products or services to you in conjunction with us.

3. Purposes of collection, use and disclosure

- 3.1. We primarily collect, use and disclose your credit information in order to provide you with our services and products relating to our businesses (“services”). This includes:
 - (a) Internally assessing whether you are eligible for our services; by reference to your previous experiences with us, particularly how you managed your obligations;
 - (b) Providing our services; for example, entering into an agreement with you for our services;
 - (c) Ongoing management of our services; for example, rendering of accounts; and
 - (d) Checking whether you are eligible for our services;
 - (e) Your credit information may be required in order for us to assess whether a debtor will be eligible for credit where you offer to be a guarantor.
- 3.2. We may also use your credit information where required or authorised by law.



4. Disclosure

- 4.1. In some circumstances, third parties assist us to provide credit to you and may have access to your credit information for this purpose. To protect your credit information, our contracts with these third parties require them to comply with the credit information provisions of the Privacy Act and only permit them to use the credit information we disclose to them for the specific function we engage them to perform. These third parties may include:
- (a) Our associated entities;
 - (b) CRBs;
 - (c) Our agents, contractors and external service providers, for example, our technology providers;
 - (d) Representatives who sell products and services on our behalf;
 - (e) Payment systems operators, such as merchants receiving credit card payments;
 - (f) Organisations that provide products or services to you in conjunction with us;
 - (g) Our financial advisers, legal advisers or auditors;
 - (h) Where permitted by law, debt collection agencies; and
 - (i) Other credit providers. For example, where you have given security over the same property to us and another credit provider.
- 4.2. Generally, we may make disclosures to third parties where:
- (a) You have either expressly or impliedly consented to the disclosure; or
 - (b) The disclosure is required or authorised by law.

5. Overseas disclosure

- 5.1. We may disclose credit information to entities that have an 'Australian link', as that term is defined in the Privacy Act.
- 5.2. We are likely to disclose credit information to entities without an 'Australian link', as that term is defined in the Privacy Act.

6. Storage method

- 6.1. The credit information we hold about you will be stored as follows:
- (a) Electronically on servers located in Australia;
 - (b) On computers located at our premises; and



(c) In hardcopy files located at our premises.

6.2. Your credit information is protected by various physical and electronic security measures, such as locks and passwords.

6.3. We have Credit Information Officers within Vantage to supervise and train our employees to maintain the security of your information.

7. Access and correction

7.1. Requests

(a) You can access the credit information we hold about you by making a written request.

(b) You can also request us to correct your credit information.

(c) Please contact us using the details set out below if you wish to make a request to access or correct your information.

7.2. Timeframes

(a) We will respond to requests for access to credit information within a reasonable period of time.

(b) In regard to correction requests, if we are satisfied that your credit information is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to update your credit information within 30 days (or such longer period you agree to in writing). We will provide written notice of corrections.

(c) If we consider that we will not be able to resolve your correction request within the 30-day time period, we will write to you to obtain an extension of time. We will also notify you that you can complain to a recognised external dispute resolution scheme about our delay.

7.3. Fees

There are no fees associated with making a request to access or correct your information. We may, however, charge a reasonable fee for processing the request, to account for locating the information and supplying it to you.

7.4. Refusals

7.1. The Privacy Act specifies certain circumstances in which we are not required to provide access to your information. In addition, if we are not satisfied that your information requires correcting we may refuse to comply with your request.

7.2. If we refuse to give you access to your credit information or to correct your credit information, we will give you a notice explaining our reasons, except where it would be unreasonable to do so.



- 7.3. If we refuse your request to correct your credit information, you also have the right to request that a statement be associated with your credit information noting that you disagree with its accuracy.
- 7.4. We will also advise you how you can complain about our refusal to provide access or to make a correction to your credit information.

8. Complaints

- 8.1. If you wish to make a complaint, please contact us on the details provided below.
- 8.2. We will acknowledge your complaint in writing, within 7 days of receipt. At this time we will advise you if we require any further information.
- 8.3. We will then conduct an investigation into your complaint. We may consult with relevant third parties. We will provide you with our decision within 30 days from the date of your complaint (unless you consent to a longer time frame in writing).
- 8.4. If you are unhappy with the outcome you may complain to the following parties about the way we handled your credit information:
 - (a) Office of the Australian Information Commissioner:
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
www.oaic.gov.au.

9. Statement of Notifiable Matters under the Credit Reporting Privacy Code

- 9.1. The Credit Reporting Privacy Code requires us to notify you of certain matters simultaneously or prior to the time of collecting personal information that is likely to be disclosed to a credit reporting body:

Those matters are:

- (a) The credit reporting body (such as Dun and Bradstreet) may include the credit information we provide to it in reports, which it then provides to other credit providers to assist those other credit providers to assess your credit worthiness;
- (b) You can request a copy of this Credit Information Management Policy by contacting us, or obtain it directly from our website;
- (c) You can request a copy of the CRB's credit reporting policy:
 - (i) From its website; or
 - (ii) By writing to directly to our CRB.



- (d) You have the right to access credit information we hold about you, request that we correct the information, and make a complaint, as is discussed in more detail above;
- (e) You can request a credit reporting body not to use your credit reporting information for the purposes of pre-screening for direct marketing by credit providers; and
- (f) You can request a credit reporting body not to use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud.
- (g) You can ask us to provide you a hard copy of this policy (including this Statement of Notifiable Matters).

10. Changes to our Credit Information Management Policy

We may change the way we handle credit information from time to time for any reason. If we do so, we will update this Credit Reporting Policy. An up-to-date version is available at <https://www.vantageperformance.com.au/>

11. Contact

You can contact us by:

- (a) Calling: 07 3229 5750
- (b) emailing: mfingland@vantageperformance.com.au
- (c) submitting an enquiry via our website at <https://www.vantageperformance.com.au/>
- (d) writing to us at GPO Box 204, Brisbane QLD 4001

Our Privacy Officer and Credit Information Officer can also be contacted in relation to privacy and credit information concerns via the above details.