

## Credit Reporting Policy

This policy outlines how Onboard Finance Pty Ltd (**Onboard**) and its related bodies corporate (**McMillan Shakespeare Group**) (**MMSG**) manage your credit information as required by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Privacy (Credit Reporting) Code 2014 (Version 2.2) (**CR Code**). We may provide more details on how we manage your credit-related personal information at the time that we collect information. This Policy, sets out how we collect, use, and disclose your -credit-related personal information. Further details on our collection, use, disclosure and management of your personal and sensitive information are outlined in our Privacy Statement, available at <https://onboardfinance.com.au/privacy-policy> and accompanying Privacy Policy, available at <https://mmsg.com.au/privacy/>.

### 1. What is “credit-related personal information”?

Your personal information is any information or any opinion about you, where you are reasonably identifiable, regardless of whether that information or opinion is true or recorded in a material form.

This policy explains how we manage your **credit-related personal information**, which is comprised of:

<b>Credit information</b>	<p>Your personal information, including information about:</p> <ul style="list-style-type: none"> <li>▪ your identity;</li> <li>▪ the consumer credit you’ve borrowed;</li> <li>▪ your repayment history and default information;</li> <li>▪ whether an information request has been made about you;</li> <li>▪ the type of consumer or commercial credit you have applied for, and any information requests made in connection with that application;</li> <li>▪ your payment information and any new arrangement information;</li> <li>▪ your court proceedings, insolvencies or Australian publicly available information that isn’t about your court proceedings or insolvencies; and</li> <li>▪ your serious credit infringements.</li> </ul>
<b>Credit eligibility information</b>	<p>Your:</p> <ul style="list-style-type: none"> <li>▪ credit reporting information that we, or other credit providers collect about you from a credit reporting body; and</li> <li>▪ which has a bearing on your credit worthiness and is used, has been used or could be used in establishing your eligibility for credit, such as our internal credit scores (also referred to as <i>CP derived information</i>).</li> </ul>

### 2. What kinds of credit-related personal information do we collect and hold, and how do we collect and hold that information?

Where you apply for a lease, we may ask for:

- certain identification information from you, such as your name and address, date of birth, and your driver’s licence number;
- banking or credit account details;

- name of employer;
- your financial position in order to assess an application for a lease and to assist in the ongoing management of the lease;
- your credit reports, internal credit scores or assessments, or opinions about your creditworthiness provided to us by a credit reporting body;
- your employment, income, expenses and savings;
- details about credit applied for or provided by other lenders or financial institutions (including any guarantees you have given), including your past experiences with us and other lenders or financial institutions, such as the kinds of credit products you have had or sought and how you have managed your obligations;
- details of your credit history, including credit defaults and repayments (missed or late) made in relation to any credit provided to you;
- if you make a hardship application, other information about your personal circumstances;
- details of any credit-related court proceedings or insolvency applications that relate to you;
- information about any credit payments are overdue or that your repayments are no longer overdue;
- information about other credit provided to you has been paid or otherwise discharged; and
- any credit-related information connected to our assessment of your creditworthiness.

### **3. How do we collect and hold credit-related personal information?**

We normally collect your credit-related personal information from you. Sometimes we collect credit information about you from other people without your direct involvement. For example, we may collect credit reports from credit reporting bodies or opinions from other lenders about your creditworthiness.

We may also seek credit information about you from:

- other McMillian Shakespeare Group related companies;
- credit reporting bodies;
- other credit providers;
- publicly available sources of information, such as public registers;
- your employer;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- other organisations, who jointly with us, provide products or services to you; and
- commercial information service providers, such as companies that provide fraud prevention reports.

### **4. Why do we collect, hold, use and disclose your credit-related personal information?**

The main reason we collect, use, hold and disclosure credit-related personal information is to provide you with our services. This includes:

- verifying your identity;

- assessing your eligibility for the product or service you have applied for by, for example carrying out credit checks or otherwise assessing your creditworthiness;
- providing the product or service you have asked for, including administration and maintenance;
- conducting securitisation, research, risk management and portfolio analysis;
- helping manage the product or service and managing our internal risks;
- managing overdue payments and taking enforcement action if there is a payment default;
- providing information to credit reporting bodies as permitted by the Privacy Act and CR Code, including default information;
- complying with legislative or regulatory requirements in any jurisdiction; and
- preventing fraud, crime or other activity that may cause harm in relation to our products or services and helps us run our business.

In addition, we may also use your credit-related personal information to notify you about products or services we think you may be interested in.

## **5. Who we may disclose your credit-related personal information to, and why?**

### ***Generally***

We may disclose your credit information and credit eligibility information to third parties including:

- other McMillian Shakespeare Group related companies;
- where necessary, parties involved in the novated leasing arrangement you have applied for;
- organisations that perform credit assessment, management and debt collection activities on our behalf;
- current or prospective security providers in relation to credit we are providing to you;
- organisations involved in debt collection, assignment or securitisation;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- government agencies where necessary;
- dispute resolution schemes that assist consumers in relation to credit complaints; and
- credit representatives who sell products and services on our behalf.

The McMillan Shakespeare Group's business activities are conducted in Australia and overseas. In order to provide our services to our customers, we may engage other Service Providers to perform certain functions. These functions may involve the hosting or accessing of credit information by the Service Provider outside of Australia.

At the present time: the McMillian Shakespeare Group's Service Providers may disclose credit information to the following countries:

- the United States of America;
- the Republic of Ireland;
- India;
- China;
- Sri Lanka; and
- Philippines.

### ***Exchanging information with credit reporting bodies***

The credit reporting bodies (**CRBs**) that we exchange your credit-related personal information with are:

#### **Equifax**

Equifax Australia Information Services and Solutions Pty Limited  
GPO Box 964  
North Sydney NSW 2059  
Phone: 13 83 32  
Website: [www.equifax.com.au/privacy](http://www.equifax.com.au/privacy)

We may exchange your credit-related personal information or credit reporting information with a CRB for the purposes of:

- identifying you and assessing your lease application;
- obtaining credit reports about you; and
- managing overdue payments (we may disclose your adverse credit information, such as default information, repayment history information and overdue payments and serious credit infringements in certain circumstances).

#### ***Our Statement of Notifiable Matters***

When we exchange your credit-related personal information with the CRBs above, it is important for you to note that:

- a CRB may include the information in reports provided to other credit providers to assist them to assess your credit worthiness;
- if you fail to meet your payment obligations in relation to your consumer lease or commit a serious credit infringement, we may be entitled to disclose this to the CRB;
- you may obtain our Credit Reporting Policy, which sets out our management of your credit-related personal information;
- you may obtain the Credit Reporting Policy of Equifax from [www.equifax.com.au/credit-reporting-policy](http://www.equifax.com.au/credit-reporting-policy);
- you have the right to ask us for access or correction of your credit-related information, and to make a complaint;
- you have the right to request the CRB not to use your credit reporting information for the purposes of pre-screening of direct marketing by a credit provider; and
- you have the right to ask the CRB to not use or disclose your credit reporting information, if you reasonably believe that you have been, or you are likely to be a victim of fraud.

## **6. How do we hold and keep your credit-related personal information?**

We will keep your credit-related personal information secure. Most of this information will be held securely in MMSG owned data centres around Australia. However, some information may be held by us securely in physical paper files.

We use a combination of physical and electronic security measures in order to protect the security of the credit information we hold. We also work with staff to provide training and to ensure our employees understand the safety measures they must take to protect your credit-related personal information.

## 7. Accessing or correcting your credit-related personal information

You may request access to any credit eligibility information that we hold about you. The type of information you request will determine the length of time we take to respond. We will generally respond using the same communication method by which your request was originally made.

If you believe your credit-related personal information that we hold about you is out-of-date, incomplete, inaccurate, irrelevant or misleading, then you may request that we correct it.

If you wish to request access to, or the correction of, your information, please contact us on the details set out below under 'Contact us'.

In some circumstances, we may charge an administration fee to retrieve and provide you with access to your information, based on our reasonable costs in providing the information to you. If we intend to charge an administration fee, we will give you an estimate of this fee so you can confirm you still want us to proceed with your request.

We do not impose any charge for submitting a request for access or correction, or for any activities required for us to correct information or update our records in response to a correction request. We are entitled to refuse you access to (or correction of) your information in certain circumstances. For example, you may not be able to access credit information:

- which we are prevented by law from disclosing; and
- we may refuse to correct any of your personal information if we do not agree that it requires correction.

If we refuse your request for access to or correction of your credit information, we will provide you with our reasons for the refusal except where it would be unreasonable to do so. We will also provide you with information on how you can complain about the refusal.

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.

## 8. Complaints

If you have any questions regarding this Credit Reporting Policy or any concerns of complaints regarding our treatment of your credit-related personal information (including breaches of the Privacy Act or the CR Code), or if you wish to request access to (or correction of) your information, we invite you to contact us (details are found under 'Contact us' below).

We will aim to answer your question, concern, request or complaint in a timely and satisfactory manner. If we cannot resolve the matter at the point of first contact, a representative will be in contact within a reasonable time to advise:

- who will be handling your enquiry; and
- the estimated timeframe for our investigations.

If you are not satisfied with our response or handling of your complaint, you can contact the external dispute resolution scheme, the Australian Financial Complaints Authority (**AFCA**) or the Office of the Australian Information Commissioner (**OAIC**):

<b>Australian Financial Complaints Authority</b>	
Post	GPO Box 3 Melbourne VIC 3001
Phone	1800 931 678
Email	<a href="mailto:info@afca.org.au">info@afca.org.au</a>

Online	<a href="http://www.afca.org.au">www.afca.org.au</a>
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#### **Office of the Australian Information Commissioner**

Post	GPO Box 5218, Sydney NSW 2001
Phone	1300 363 992
Online form	<a href="#">Click here</a>

## **9. Contact us**

#### **Privacy Officer, McMillan Shakespeare Ltd**

Post	Locked Bag 18, Collins Street, East Melbourne 8003 VIC Australia
Phone	1300 649 515
Email	<a href="mailto:privacy@mmsg.com.au">privacy@mmsg.com.au</a>

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