

## Attachment A

### CREDIT POLICY

19 JUNE 2020

### CREDIT MANAGEMENT

In certain circumstances Scott Bader Australia may be a credit provider under the Privacy Act. As a credit provider, Scott Bader Australia must comply with Part IIIA of the Privacy Act and the *Privacy (Credit Reporting) Code 2014* (the **Code**) when collecting and handling credit related Personal Information (**Credit Related Personal Information**). This Credit Policy applies to Credit Related Personal Information and explains how we handle this kind of Personal Information. This Credit Policy should be read in conjunction with our Privacy Policy which is available [here](#).

#### **The purposes for which Credit Related Personal Information is collected, held, used and disclosed**

Scott Bader Australia may collect, hold, use and disclose Credit Related Personal Information to assess your credit situation, when you seek to obtain Scott Bader Australia goods or services under credit terms. We primarily collect and use Credit Related Personal Information to assist us to decide whether it is appropriate or sensible, based on your credit worthiness, to approve your application for a credit account, or otherwise enter into a deferred payment arrangement with you.

We may also collect, hold, use or disclose Credit Related Personal Information to:

- service and administer our account with you, including to deal with your financial institution where we are authorised by you to debit your nominated account;
- to help us and our financiers decide whether or not to provide credit to you (or to your related company or other entity);
- maintain and update our records of information you have provided us (including by way of a credit application form);
- obtain information from a credit reporting body or credit provider regarding or relating to your credit worthiness, where we are permitted to disclose it by the Privacy Act;
- comply with our obligations under the Privacy Act, the Code and any other laws, including our complaint handling obligations;
- undertake debt recovery action; or
- undertake a registration of security interests (for example, on the Personal Property and Security Register).

#### **Who does Scott Bader Australia collect Credit Related Personal Information from?**

- We will generally collect Credit Related Personal Information directly from you. However we may also collect Credit Related Information from credit providers and credit reporting bodies.

For instance, we may use identification information and other personal information you provide us to obtain information about you for a commercial credit related purpose (such as assessing an application for credit made by you or your company). We may also derive Credit Related Personal Information from our interactions with you and in managing your account.

- The Credit Related Information provided to Scott Bader Australia by credit reporting bodies and other credit providers may include information about your previous credit checks, any problems you have had paying bills and whether those issues were resolved..

### **What kinds of Credit Related Personal Information does Scott Bader Australia collect, hold, use and disclose?**

Credit Related Personal Information that Scott Bader Australia may collect, hold, use or disclose includes the following (however note that Scott Bader Australia's disclosures of these types of information are limited, as described further below):

- your name, address (including current and past addresses), gender, date of birth, employer and driver's licence number;
- the fact that you have applied for credit through Scott Bader Australia and that we have accessed your credit reporting file from a credit reporting body;
- the status of outstanding payments that you owe to Scott Bader Australia, including whether they are overdue and when overdue amounts are paid;
- that we have implemented debt recovery action;
- information about you in the National Personal Insolvency Index database;
- our opinion, or the opinion of another credit provider, that you have committed a serious credit infringement (such as acting fraudulently to obtain credit);
- publicly available information about you relating to your activities in Australia or credit worthiness, such as information available via publicly accessible databases and annual reports;
- information about a credit-related judgment against you in (non-criminal) proceedings in an Australian court;
- personal information provided to us by a credit reporting body that may have a bearing on your credit worthiness; and
- any administrative information relevant to managing our relationship with you.

### **Who does Scott Bader Australia disclose Credit Related Personal Information to?**

We may disclose your Credit Related Personal Information to credit reporting bodies and other credit providers, but only when permitted to do so by the Privacy Act and the Credit Reporting Code as registered under section 26S(1) of the Privacy Act.

Where we have received your written consent, we may disclose identification information, and information about your credit worthiness, to other credit providers.

We may disclose Credit Related Personal Information (usually limited to identification information) to credit reporting bodies when seeking information from them about your credit worthiness. We also provide credit reporting bodies with summaries of amounts owing to us, along with the ABNs of each debtor, but we do not disclose whether those amounts are overdue. The credit reporting body may include that information in reports provided to credit providers to assist them to assess your credit worthiness. The credit reporting bodies that Scott Bader Australia usually discloses credit information to are as follows:

- Equifax, phone 138 332 <https://www.equifax.com.au/>
- Experian, phone 1300 783 684 <https://www.experian.com.au/>
- illion, phone 1300 734 806 <https://www.illion.com.au>

Each credit reporting body has a policy which sets out how it deals with information it holds and you can obtain a copy of their policy by contacting the relevant credit reporting body using the contact details via the links above.

You have the right to ask a credit reporting body not to use or disclose your Credit Related Personal Information if you believe, on reasonable grounds, that you have been or are likely to be a victim of fraud. You also have the right to ask a credit reporting body not to use your Credit Related Personal Information for the purposes of pre-screening for direct marketing.

You should contact each credit reporting body directly to request any of the above.

### **Security and accuracy of Credit Related Personal Information**

Please refer to the information set out under “Security of Personal Information” in our Privacy Policy available [here](#), which applies equally to Credit Related Personal Information.

### **Access to, correction of and complaints about handling of Credit Related Personal Information**

You can access any Credit Related Personal Information we hold about you, ask us to correct it, or make a complaint by contacting our Privacy Officer:

**By telephone:** +61 8 9418 4555 / + 971 566 44 9524

**By email:** [david\\_rossouw@scottbader.ae](mailto:david_rossouw@scottbader.ae)

**By post:** P.O. Box 16785, Jebel Ali, Dubai, United Arab Emirates

However, we must take reasonable steps to verify your identity before granting you access to Credit Related Personal Information and we will require that you provide us with evidence to support your request for access, such as a copy of your drivers licence or passport or other documents that will confirm your identity to our reasonable satisfaction.



If we agree that our records regarding your Credit Related Personal Information need to be corrected, and we have previously disclosed that information to a credit reporting body or other person, we will tell them about the correction. We will not charge you to request access or correct Credit Related Personal Information that Scott Bader Australia holds about you. We are permitted to charge you for reasonable costs incurred in providing you with access to your information.

We will generally provide access and resolve correction requests within 30 days of a request, unless unusual circumstances apply (including where we have been unable to verify your identity). However, once we determine that a correction should occur, we will make this correction within 5 business days of making that determination.

If you complain to us about our conduct regarding our handling of your Credit Related Personal Information, we will acknowledge your complaint within 7 days and will then investigate and decide how to deal with your complaint within 30 days. If you are not satisfied with our management of your complaint you may complain to the OAIC.

If you would like to receive the information about how we handle your Credit Related Personal Information that is published on this website in an alternative form please contact us using the contact details provided.

## **General**

This Credit Policy was issued on 19 June 2020.

Scott Bader Australia may make changes to this Credit Policy from time to time, but we will not change the way we use Personal Information you have provided to us previously without your consent.

For more information on our privacy practices generally, please see our [Privacy Policy](#).

For information about changes to credit reporting generally visit the Office of the Australian Information Commissioner – <https://www.oaic.gov.au/privacy/credit-reporting/>