

Credit Reporting Policy & Statement of Notifiable Matters

1. General information

We (Flexihire Pty Ltd ACN 010 108 559 trading as Flexihire) understand the importance of your privacy. This Credit Reporting Policy (Policy) sets out how we collect, hold, use and disclose your credit-related information. As defined in the Privacy Act 1988 (Cth) (Privacy Act):

- 'Credit information' is information collected by us and provided to a credit reporting body;
- 'Credit eligibility information' is information provided to us by credit reporting bodies; and
- 'CP-derived information' is information that is derived from the above forms of information, such as a credit score or report.

We will collectively refer to these types of information as 'credit-related information' throughout this policy.

We treat all credit-related information collected by us in accordance with this Policy, the Privacy Act and the Australian Privacy Principles (APP).

This Policy should be read in conjunction with our Privacy Policy which sets out how we collect, hold, use and disclose other types of non-credit related personal information. Our Privacy Policy is available on our website <www.flexihire.com.au> (the Site).

2. Statement of Notifiable Matters

In accordance with the Privacy (Credit Reporting) Code 2014 (CR Code) there are a number of 'notifiable matters' that you need to be aware of regarding the credit-related information that we collect about you, and that is likely to be disclosed to a credit reporting body, including:

- (a) if you commit a serious credit infringement, we may disclose this to a credit reporting body;
- (b) the credit reporting body may include the credit information we provide to it in reports to assist other credit providers to assess your credit worthiness;
- (c) you can contact us to determine the credit reporting bodies we may report to and visit their websites for access to their individual credit reporting policies and contact details;
- (d) we are not likely to disclose your credit-related information to overseas entities;
- (e) you have the right to access credit information we hold about you or request that we correct any information held by us as set out in this Credit Reporting Policy;
- (f) you have the right to make a complaint as set out in this Credit Reporting Policy;
- (g) you can request a credit reporting body not to use your credit-related information for the purposes of pre-screening or direct marketing by a credit provider; and
- (h) you can request a credit reporting body not to use or disclose your credit-related information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud.

3. Credit-related information collected by us

We will only collect credit-related information by lawful and fair means in accordance with the Privacy Act and CR Code. We may collect and hold the following forms of credit-related information:

- (a) identification details such as your name, address(es), telephone number(s), date of birth, driver's licence number, and current or last known employer;
- (b) details of commercial credit you have applied for (including the type and amount of credit), where we have requested that information in connection with an application for credit and/or a guarantee;
- (c) information about your terminated credit accounts (including the name of the credit provider, the date on which the credit was entered into and/or terminated, and the limit of the credit account)'
- (d) information provided by a credit reporting body that we have requested to assist with assessing your suitability for commercial credit or as a guarantor of commercial credit;
- (e) any information provided to us in a commercial credit application or guarantee;
- (f) whether, in our opinion or the opinion of another credit provider, you have committed a serious credit infringement;
- (g) publicly available information that relates to your activities in Australia and your credit-worthiness;
- (h) information about you on the National Personal Insolvency Index; and
- (i) information about court judgments which relate to credit you have previously obtained or applied for.

Any terms described have the meanings given to them in the definitions of the Privacy Act.

4. Sources of collection

We may obtain your credit-related information from:

- (a) credit reporting bodies we may deal with from time to time;
- (b) with respect to information about your commercial credit-worthiness - businesses that provide that type of information;
- (c) the trade references provided by you upon applying for a credit account with us;
- (d) information you provide to us in a completed application for commercial credit and/or guarantee (such as your name, date of birth, residential and/or business address, contact details, trade references, banking details, assets, income, and financial position);
- (e) other credit providers (where you consent to us collecting that information or we are permitted to do so under the Privacy Act); and
- (f) information we collect in the course of our dealings with you in connection with credit, such as when you make payments to us.

5. Basis for collection and use

We may collect, hold, or use your credit-related information (even where it is not directly related to us entering into an agreement or contract with you) for purposes necessary to fulfil our legitimate business interests. These purposes include:

- (a) verifying your identity;
- (b) making an assessment of your creditworthiness based on an application for commercial credit;
- (c) making an assessment of your suitability as a guarantor of an application for commercial credit;
- (d) reporting any default by you under an agreement;
- (e) undertaking debt recovery or enforcement actions;
- (f) exchanging information (including default information) with other credit providers, as permitted by the Privacy Act and CR Code; or
- (g) satisfying legal or regulatory requirements.

We are unlikely to disclose credit-reporting information to overseas parties and do not currently store credit-related information overseas.

6. Disclosure of credit-related information

6.1 Credit reporting bodies

We may disclose your credit-related information to a credit reporting body for the purposes set out above and where the Privacy Act permits us to do so. The types of information we may disclose to a credit reporting body include:

- (a) that you have applied for credit with us (including the amount of credit) or that we are a current provider of credit to you;
- (b) that you have guaranteed credit to us (including the amount of credit guaranteed);
- (c) that you have failed to meet your payment obligations to us (including the amount of an outstanding debt);
- (d) that credit we provided to you has been paid or otherwise discharged;
- (e) that a guarantee you provided to us has been satisfied or otherwise discharged; and
- (f) in some circumstances, that in our opinion you have committed a serious credit infringement.

6.2 Trade insurers

In connection to an application for commercial credit, trade insurers may also obtain credit-related information about you from us or a credit reporting body for the purpose of assessing whether to provide insurance to us in relation to the commercial credit we provide you (including assessment of the risk of insuring us, the risk of default by you and/or you in your capacity as a guarantor).

6.3 Third party services

We will disclose your credit-related information where we outsource certain functions to third party service providers. The functions we may outsource include:

- (a) managing the supply of our products and/or services;
- (b) establishing credit accounts and managing credit provided to our customers;
- (c) processing payments through third-party payment applications;
- (d) assessing credit applications and guarantees;
- (e) responding to enquiries about applications, accounts, our products and our services; (f) conducting checks for credit worthiness or fraud; and
- (g) debt collection.

Where we disclose your credit-related information to a third-party service provider, we will require those providers to comply with the Privacy Act and CR Code. Our third-party service providers will not collect, use, or disclose your credit related information for any purpose other than our own.

7. Protecting your credit-related information

7.1 Steps we take

We take reasonable steps to protect all credit-related information we hold from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

The precautionary steps we take to protect credit-related information include:

- (a) adopting measures to protect our computer systems and networks for storing, processing and transmitting information;
- (b) adoption of procedural and personnel measures for limiting access to credit-related information by our staff;
- (c) requiring all of our third party service providers to handle credit-related information in accordance with the Privacy Act, CR Code and privacy regulations;
- (d) regularly reviewing our information collection, storage and processing practices; and
- (e) such other security measures we consider reasonable and appropriate from time to time.

Notwithstanding that we use our best endeavours to protect all credit-related information we collect and hold, we unfortunately cannot guarantee the complete security of the information.

7.2 De-identifying and deleting information

When your information is no longer required to be kept by us, we will take reasonable steps to destroy or delete your credit-related information in a confidential manner.

8. Accessing and updating your credit-related information

If you wish to obtain access to your credit-related information held by us, please send your request by email to us. Depending upon the circumstances, you may be asked:

- (a) to put your request in writing with evidence of your identity to verify that you are who you say; and
- (b) to provide further details to assist us in responding to your request in a timely manner.

We will respond to a request for access to credit-related information within a reasonable period after the request is made.

8.2 Access to credit-related information

We will provide you with access to your credit-related information held by us unless:

- (a) giving access would be unlawful; or
- (b) denying access is required under the Privacy Act or any other applicable law.

You can also request access to credit reporting information held by credit reporting bodies directly.

8.3 Amending your information

We endeavour to keep all credit-related information we hold accurate, up to date and complete. If at any time you wish to correct any of your credit-related information, please contact us.

If we elect not to correct your information, we will notify you, within a reasonable time, of the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the Privacy Act.

If you wish to have your information deleted, please let us know and we will take all reasonable steps to delete it, unless we need to keep it for legal reasons.

9. Variations

We reserve the right to vary this Policy from time to time without further notice to you. Any variations made will be updated on our Site. It is your responsibility to check this Policy periodically to ensure you are aware of any changes made to it. We will not reduce restrict or fundamentally alter your rights under this Policy without using our best endeavours to first provide you with notice.

10. Complaints

We strive to ensure our compliance with this Policy and to regularly review our practices against it.

If at any time you have a complaint against us regarding our Policy, including a breach of the Privacy Act, we invite you to make a complaint by contacting us on the details below. All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution to the issue raised.

In writing: PO Box 29, Brisbane Market, QLD 4106



By telephone: 1300 353 944
By email: admin@flexihire.com.au

Please note that you may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your credit-related information. Information on making a privacy complaint can be found on their website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>