

## CREDIT REPORTING POLICY

Alpha Car Finance Pty Ltd ABN 93 151 835 040 (Credit Licence No. 411447) takes its obligations to protect personal information about individuals, including credit information and credit eligibility information, seriously. Alpha is bound by the Credit Reporting Privacy Code, the Privacy Act 1988 (Cth) and the Australian Privacy Principles (“APPs”) (together, “the Privacy Act”).

### Definitions

**Personal Information:** means information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also be deemed credit information.

**Credit Information:** means information which is used to assess your eligibility to be provided with finance and will generally include the type and amount of credit provided to you, repayment history information, default information (including overdue payments) and court information. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

### About this Credit Reporting Policy

The purpose of this Credit Reporting Policy is to tell you how we manage credit information and credit eligibility information.

The Privacy Act contains a variety of detailed definitions describing these types of information. To make it easier for you to read this policy we have included only some definitions above but if you would like to refer to the full provisions in the Act and or the Credit Reporting Privacy Code they are available on the website of the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

This Policy explains:

- the kinds of credit information and credit eligibility information that we collect and hold;
- how we collect and hold credit information and credit eligibility information;
- the purposes for which we collect, hold, use and disclose credit information and credit eligibility information;
- how you may access your credit information and credit eligibility information held by us or request correction of that information;
- how to make a complaint if you consider that we have not complied with Part IIIA of the Privacy Act or with the Credit Reporting Privacy Code, and how we will deal with complaints;
- the circumstances in which we may disclose credit information and credit eligibility information to overseas recipients and the countries where such recipients may be located.

This Policy applies to any individual in relation to whom we hold credit information or credit eligibility information no matter how they interact with us (e.g. online, in person at a branch or over the phone).

### What kinds of credit information do we collect and hold?

At Alpha Companies we collect and hold various kinds of credit-related information which may include:

- identification information including your current and any prior names and addresses, any known alias you may have, your date of birth, your driver's licence number (if applicable) and your current or last known employer;
- details of consumer credit or commercial credit (including the name of each relevant credit provider) that you have applied for, the type and amount of that credit and the fact that a credit provider, mortgage insurer or trade insurer has sought information about you from a credit reporting body in relation to an application;
- consumer credit liability information, being information about consumer credit accounts you hold, or have held, with us, such as the type of account, the date the account was opened and closed, the maximum amount of credit approved for that account and some specific terms and conditions relating to the repayment of credit under that account.
- repayment history information, which includes whether in relation to your consumer credit facilities you have made payments when due and, if not, when overdue payments have been made;
- default information, being 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 disclose to a credit reporting body if certain requirements under the Privacy Act are met.
- payment information, which includes details of the date on which you have paid overdue amounts that were previously recorded as default information with a credit reporting body;
- whether in our or another credit provider's opinion you have committed a serious credit infringement;

- new arrangement information which outlines that you have entered into certain types of arrangements with us in relation to consumer credit where you have been overdue in making a payment and we have provided default information to a credit reporting body. New arrangement information is either that the terms and conditions of that consumer credit have been varied as a result of you being overdue or that you have been provided with new credit relating to the original amount of credit.
- court proceedings information, which includes information about a judgement against you in proceedings that relate to any credit that has been provided to, or applied for, by you;
- personal insolvency information;
- certain publicly available information;
- scores, ratings, summaries, evaluations and other information relating to your credit worthiness which is derived by us or by credit reporting bodies wholly or partly on the basis of the information above; and
- certain administrative information relating to credit, such as account and customer numbers.

Credit related information may be collected by Alpha Companies in a number of ways including:

- by using written forms;
- through contact over the telephone, your mobile or other messaging technology;
- via the internet; and
- in person.

We may collect credit related information:

- directly from you or from persons or organisations acting on your behalf;
- from credit reporting bodies and other credit providers;
- from publicly available sources of information; and
- from information derived by us from your conduct.

Alpha Companies, or service providers on our behalf, may hold your credit related information in computer systems, electronic form, digital records, telephone recordings and/or in paper files.

Alpha Companies takes reasonable steps, including physical, electronic and procedural safeguards, to protect your credit related information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

### **Exchanges of information about you with credit reporting bodies?**

We may obtain credit reporting information about you from a credit reporting body. Credit reporting information includes:

- credit information of the kinds listed under 'What kinds of credit information do we collect and hold?' but relating primarily to your dealings with other credit providers (such as about credit applications you have made or credit that you hold with other credit providers). This information will typically have been provided by other credit providers or other third parties; and
- creditworthiness information about you that credit reporting bodies derive from the information above, such as credit scores, risk ratings and other evaluations about you.
- We may disclose your credit information to credit reporting bodies where the Privacy Act permits us to do so.
- For example, if you fail to meet your payment obligations in relation to consumer credit provided by us or if you commit a serious credit infringement, we may be entitled to disclose this to a credit reporting body.
- Credit reporting bodies may include credit-related information provided by us in reports provided to other credit providers to assist them to assess your creditworthiness.

We currently disclose credit information to Equifax and Illion. Their contact details are:

#### **Equifax:**

- By Post: Equifax, Customer Resolutions Team, GPO Box 964, NORTH SYDNEY NSW 2059
- By Phone: 138 332
- By Website: <https://www.equifax.com.au/>

Equifax is required to have a policy which explains how they will manage your credit-related personal information. If you would like to read Equifax's policy, visit their website and follow the "Privacy" link, or you can contact them directly for further information.

You have the right to request Equifax to exclude your credit reporting information from any permissible direct marketing activities Alpha Companies may request them to perform. You also have the right to request Equifax not to use or disclose your credit reporting information if you believe that you have been, or are likely to be, the victim of fraud (for example, you suspect someone is using your identity details to apply for credit). You must contact Equifax directly should this be the case.

You can contact **Illion**:

- By Telephone: 13 23 33 (or +61 9828 3200)
- By Email: [publicrelations@illion.com.au](mailto:publicrelations@illion.com.au)
- By Website: <https://www.illion.com.au/contact-us/>

### **What kinds of credit worthiness information do we derive from credit reporting information?**

We use credit reporting information acquired from credit reporting bodies to derive other information that assists us in assessing your creditworthiness, for example credit risk ratings and credit scores.

### **For what purposes do we collect, hold, use and disclose credit information and credit eligibility information?**

Alpha Companies collects, holds, uses and discloses credit information and credit eligibility information about you for purposes reasonably necessary for our business activities and consistently with the requirements in the Privacy Act as permitted by law. These purposes include:

- to assess applications for credit (including assessing any proposed guarantors);
- for the ongoing servicing and administration of our accounts and products;
- to assist with the management, including recovery, of outstanding debts;
- to assist you if we consider that you may be at risk of default;
- internal management purposes;
- for data analysis;
- to participate in the credit reporting system and provide information to credit reporting bodies as permitted by the Privacy Act;
- to undertake securitisation activities and debt assignments;
- to deal with complaints and legal proceedings;
- to meet our legal and regulatory requirements (such as reporting matters to regulators or enforcement bodies when authorised or required by law); and
- to assist other credit providers with such purposes in circumstances permitted by the Privacy Act (such as disclosing information to another credit provider with your consent or where you have committed a serious credit infringement).

Restrictions apply under the Privacy Act in relation to the circumstances and purposes for which such information may be used or disclosed and we comply with these restrictions. For example, credit eligibility may not be disclosed to some types of overseas entities and restrictions apply to the use of credit eligibility information for direct marketing.

### **How do we hold and protect credit information and credit eligibility information?**

We store information in different ways, including in physical and electronic form. The security of your credit eligibility information is important to us and we take

reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements of our employees;
- security measures for access to our systems;
- only giving access to credit information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites.

We can store credit information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

### **DISCLOSURE OF YOUR INFORMATION OVERSEAS**

Alpha Car Finance may disclose your personal information to our office in the Philippines which carries out credit assessment and collection services.

### **How can you access credit eligibility information we hold about you?**

You may access the credit eligibility information which we hold about you by contacting us on the details provided on our website. There is no charge for providing the information to you.

We will need to verify your identity before giving you access. We will usually provide the information requested within 30 days of receiving your request. If there is a reason we are unable to agree to a request for access to your credit eligibility information we will advise you of this in writing.

### **Correction of Credit Related Information**

We aim to hold accurate and up-to-date credit information and credit eligibility information about you at all times. If you believe that any credit-related information held by us about you is inaccurate, incomplete, irrelevant, out of date or misleading you have the right under the Privacy Act to request that we correct that credit-related information.

To seek such a correction please contact us to discuss your query:

- By Telephone: 1300 257 426
- By Fax: 07 3868 2601
- By email: [feedback@alphacompanies.com.au](mailto:feedback@alphacompanies.com.au)
- By Post: GPO Box 1185, Brisbane, QLD 4001

In certain situations, we may not agree to a request to correct information we hold about you. If this occurs, we will advise you of this and our reason for not agreeing to the correction request.

#### **How can you make a complaint about our compliance with our credit reporting obligations?**

Where an Alpha customer believes that Alpha has failed to comply with the Privacy Act 1988 (Cth), the Credit Reporting Privacy Code or one or more of the Australian Privacy Principles the customer may make a complaint and begin the Internal Dispute Resolution (IDR) process. To make an internal complaint to Alpha, one of the following methods may be used:

- In Person: by visiting an Alpha Branch
- By Telephone: 1300 257 426
- By Fax: 07 3868 2601
- By email: [feedback@alphacompanies.com.au](mailto:feedback@alphacompanies.com.au)
- By Post: GPO Box 1185, Brisbane, QLD 4001

Alpha will make efforts to resolve all complaints within 15 business days of receipt of the complaint (you will receive communications during this time, including a final determination). If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

#### **AFCA:**

Website: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto:info@afca.org.au)

Telephone: 1800 931 678 (free call)

In Writing: Australian Financial Complaints Authority,  
GPO Box 3, Melbourne VIC 3001

Alternatively, you may refer the matter to the Office of the Australian Information Commissioner ('OAIC').

#### **OAIC:**

By Post: GPO Box 2999, Canberra ACT 2601

By Telephone: 1300 363 992

By Fax: 02 9284 9666

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

#### **Trading Names**

The Alpha Companies to which this policy applies are: Alpha Car Finance Pty Ltd (ABN 93 151 835 040) and AGLC Holdings Pty Ltd (ABN 24 115 911 683).

#### **Last Updated**

This document was updated and/or last released on 15/01/2020.