

Credit Reporting Policy



Purpose

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 Privacy (Credit Reporting) Code (CR Code), the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles ("APPs").

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.

Policy

About this Credit Reporting Policy

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

This Policy applies to any individual in relation to whom we hold credit-related 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 may collect and hold various information related to your financial position and your creditworthiness (such as 'credit information', 'credit-eligibility information', 'CRB derived information', and 'CP derived information' (as those terms are defined in the Privacy Act), detailed further below). In this Credit Reporting Policy, we refer to 'credit-related information' to capture some or all information related to your financial position such as credit that have been provided to you, or that you have applied for, which may have bearing on your creditworthiness and which we may use in our decision to approve or reject your credit application. This credit-related information may include:

- information about your financial position, including income, liabilities, and repayment capacity (we do not disclose this information to CRBs);
- certain administrative information relating to credit, such as account and customer numbers;
- credit information, such as:
 - 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;
 - the fact that you have applied for credit, the type of credit, and the amount;
 - the name of your other credit providers;

- a statement that a credit provider, mortgage insurer or trade insurer has sought information about you from a credit reporting body in relation to a credit 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;
- the fact that credit provided to you has been paid or otherwise discharged (including the date of discharge);
- 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 a credit provider in relation to consumer credit where you have been overdue in making a payment;
- court proceedings information, which includes information about a judgment 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 that relates to your activities in Australia and your credit worthiness (other than court proceedings information or information that you are entered or recorded on the National Personal Insolvency Index);
- Credit eligibility information, such as:
 - any of the above information; and
 - scores, ratings, summaries, evaluations, risk profile analyses, and other information relating to your credit worthiness which is derived by us or by credit reporting bodies from credit information held by a CRB and which is used or could be used in establishing your eligibility for consumer credit.

Method of Collection

Credit-related information will generally be collected directly from you in a number of ways including:

- by using written and online forms;
- through contact over the telephone, or other messaging technology;
- via the internet (including email and use of our online contact forms); and
- in person.

We will also collect credit related information:

- 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.

For what purposes do we collect, hold, use and disclose credit-related information?

Alpha Companies collects, holds, uses and discloses credit-related information about you for purposes reasonably necessary for our business activities and consistent with our rights and obligations at law. These purposes include:

- to assess your financial position and application for credit (including assessing any proposed guarantors);
- providing you with credit;
- 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; and
- to meet our legal and regulatory requirements (such as reporting matters to regulators or enforcement bodies when authorised or required by law); and
- for purposes otherwise required or permitted by law.

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 information may not be disclosed to some types of overseas entities and restrictions apply to the use of credit eligibility information for direct marketing.

Failure to provide information

If the credit-related information you provide to us is incomplete or inaccurate, or we are not able to obtain complete and accurate credit-related information about you from third parties, we will not be able to assess your application for credit.

How do we use and disclose and your information?

Generally, we only use and disclose credit-related information about you for the purposes for which it was collected (as set out above). Alpha may disclose Your credit-related information from time to time to:

- Alpha's employees, contractors, and related and affiliated entities;
- service providers who assist Alpha in operating its business and providing goods, services, and information to you (as set out in the Privacy Policy);
- third parties to whom you have agreed we may disclose your credit-related information;
- a proposed or actual purchaser/newly controlling entity of a sale and/or transfer of control of all or part of Alpha's business, where Your credit-related information is relevant to any part of the business for sale and/or transfer;
- the following CRBs:
 - Illion (Contact details at www.illion.com.au/contact-us); and
 - Equifax (Contact details at www.mycreditfile.com.au/support).

For information about how Ilion and Equifax manages credit related personal information, see their privacy policy available on the website set out above:

- third parties who assist us in processing your credit application or managing the credit provided by us;
- third parties for securitisation purposes;
- third parties for the purposes of considering whether to accept an assignment of debt, or to take an interest in the credit provider;
- other Australian credit providers (either with your consent, or as permitted by law);
- enforcement bodies;
- external dispute resolution providers;
- guarantors or proposed guarantors (either with your consent, or as permitted by law);
- credit insurers;
- debt collectors; and
- other third parties where required or authorised by law.

Disclosure of your information overseas

Alpha Car Finance is assisted by a variety of external service providers to deliver its services, some of whom may be located overseas. These third parties are too numerous to list, and they change from time to time. Some examples of the types of third parties include:

- cloud service providers such as DotDigital located in the US; and
- our support staff located in the Philippines who carry out credit assessment and collection services.

We have taken reasonable steps to ensure these third parties have appropriate security for Your Personal Information.

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

We store information in different ways, including in physical and electronic form. We take reasonable steps to ensure your information is stored safely 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;
- physical and electronic security measures for access to our systems and information;
- only giving access to credit-related information to a person who is authorised 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 may store credit-related information physically or electronically with third party data storage providers. Where we do this, we use reasonable steps (which generally includes contractual arrangements) to ensure those providers take appropriate measures to protect that information and use it only for the purposes for which they were provided that information.

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

You may access the credit eligibility information which we hold about you by making a written request using the details below. There is no charge for making a request.

We will need to verify your identity before giving you access. We endeavor to respond to your request within 30 days. 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 (unless it is unreasonable to provide our reasoning), and mechanisms available for making a complaint.

Correction of Credit Related Information

If you believe that any credit-related information held by us about you is inaccurate, incomplete, irrelevant, out of date or misleading you may request in writing that we correct that credit-related information using the details below.

- **Telephone:** 1300 257 426
- **Fax:** 07 3868 2601
- **Email:** feedback@alphacompanies.com.au
- **Post:** GPO Box 1185, Brisbane, QLD 4001

We will need to verify your identity before agreeing to correct the information.

In certain situations, we may not agree to a request to correct information we hold about you (for example, where correcting the information would be unlawful). If this occurs, we will advise you of this and our reason for not agreeing to the correction request (unless it is unreasonable to provide our reasoning), and mechanisms for making a complaint.

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

If you have any queries or complaints about this Credit Reporting Policy or the way we handle your credit-related information, or you wish to make a complaint about a breach of the the Privacy Act, the CR Code or one or more of the Australian Privacy Principles please contact us using the details above, or in person by visiting an Alpha branch.

Alpha will make efforts to respond to all complaints within 15 business days of receipt of the complaint, or another timeframe agreed with you in writing (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

Email: 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').

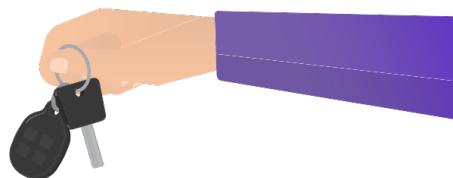
OAIC:

By Post: GPO Box 2999, Canberra ACT 2601

By Telephone: 1300 363 992

By Fax: 02 9284 9666

Website: www.oaic.gov.au



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 13/01/2021