



Perpetual Limited

GROUP POLICY – CREDIT INFORMATION

1 April 2020

PURPOSE

As a statutory credit provider, we must treat any consumer credit-related information (**credit information**) we come into contact with in accordance with the *Privacy Act 1998 (Privacy Act)* and the Privacy (Credit Reporting) Code (**Code**).

We do not directly collect, disclose or handle your credit information or request your credit reporting information from credit reporting bodies (**CRBs**). Instead, we work with clients or other credit providers who conduct these activities.

In collecting, handling, disclosing or otherwise dealing with your credit information, our clients or other credit providers must comply with the law, their own credit reporting policies and the agreements they have with us.

In the event that we come into possession of your credit information, this credit information policy (**policy**) sets out how we will handle, disclose or otherwise deal with that credit information.

This policy is relevant to current and former credit customers of our clients or other credit providers, as well as other individuals we deal with in connection with any credit that our clients or other credit providers provide (such as guarantors and directors).

For information about our management of your other personal information, please see our Privacy Policy, available by visiting <http://www.perpetual.com.au/> or by contacting our Privacy Officer (contact details at the end of the document).

SCOPE

This policy applies to Perpetual Limited (ABN 86 000 431 827) and its related bodies corporate in Australia.

POLICY

1. TYPES OF CREDIT INFORMATION PERPETUAL'S CLIENTS OR OTHER CREDIT PROVIDERS MAY COLLECT, USE & DISCLOSE AND HOW PERPETUAL WILL DEAL WITH IT (IF APPLICABLE)

We do not collect your credit information. Our clients or other credit providers under custody, securitisation or other legal title arrangements usually collect, hold and disclose various types of credit information, which may include:

- your current and previous names and addresses, age, occupation (including the name of your employer), and your driver's licence number
- that you have applied for consumer or commercial credit (including the name of each relevant credit provider), the type and amount of that credit and the fact that they have accessed your consumer credit information to assess a relevant application
- that they (and other credit providers) are or have been a provider of credit to you and the type, characteristics and maximum amount of credit that they have provided or will provide
- the date that any credit contract they (or other credit providers) have or had with you was entered into and the date that it is terminated or otherwise ceases
- your repayment history, i.e. whether in relation to credit facilities provided by them (or other credit providers), you have made payments when due and if not when overdue payments have been made
- payments owed to them (or another credit provider), in connection with credit provided to you or in relation to which you are a guarantor, overdue for more than 60 days (and, if you subsequently repaid any such overdue payment, the fact of that repayment)
- whether in their (or another credit provider's) opinion you have committed a serious credit infringement

- whether you have entered into arrangements with them (or other credit providers) in connection with credit provided to you
- court proceedings information, personal insolvency information and publicly available credit information
- scores, ratings, summaries, evaluations and other information relating to your credit worthiness which is derived by them or by CRBs wholly or partly on the basis of the information above
- certain administrative information relating to credit, such as account and customer numbers.

This information may be collected in a number of ways that will be set out on the client's or other credit provider's website and in their credit reporting policy.

2. HOW PERPETUAL WILL HOLD YOUR CREDIT INFORMATION (IF APPLICABLE)

If we come into possession of your credit information, we may hold your credit information in physical form or in electronic form on our systems or the systems of our clients or other credit providers.

Any credit information we may hold about you is protected by physical, electronic, and procedural safeguards. We require our clients or other credit providers that hold and process such information to follow appropriate standards of security and confidentiality and to comply with all applicable laws and regulations.

We train people who work for us on how to handle credit information appropriately and we restrict access to what is necessary for specific job functions.

3. PURPOSES FOR WHICH PERPETUAL AND ITS CLIENTS OR OTHER CREDIT PROVIDERS MAY COLLECT, HOLD, USE OR DISCLOSE YOUR CREDIT INFORMATION

Our clients or other credit providers may collect, hold, use and disclose your credit information as reasonably necessary for our securitisation, custody or other business purposes and as permitted by law. These purposes would be set out on the client's or other credit provider's website, in their credit reporting policy and, if applicable, borrower documentation.

We may hold, use or disclose your credit information, in limited circumstances including:

- to undertake custody or securitisation activities
- to undertake debt recovery and enforcement activities, including in relation to guarantors, and to deal with serious credit infringements (if requested by our clients or other credit providers – please note this is usually handled by third parties)
- to deal with complaints and meet legal and regulatory requirements
- to assist other credit providers to do the same.

Some credit information may only be used or disclosed under the Privacy Act for some of these purposes or in some circumstances.

4. DISCLOSURE OF CREDIT INFORMATION TO CRBS AND YOUR RIGHTS IN RELATION TO CRBS

If our clients or other credit providers disclose your credit information to a CRB, it would be for purposes such as those described above and if the Privacy Act permits them to do so.

OPTING OUT OF DIRECT MARKETING PRE-SCREENINGS

A CRB may use your credit reporting information to assist a credit provider to market to you by pre-screening you for direct marketing by the credit provider. This process is known as a "pre-screening". If you do not want a CRB used by a credit provider to use your information for the purpose of pre-screening, you have the right under the Privacy Act to request that they exclude you by contacting that CRB.

IF YOU ARE A VICTIM OF FRAUD (INCLUDING IDENTITY-RELATED FRAUD)

You are entitled under the Privacy Act to request that a CRB not use or disclose the credit reporting information they hold about you in circumstances where you reasonably believe that you have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a “ban period”. You can make such a request to a CRB used by a credit provider.

5. DISCLOSURE OF CREDIT INFORMATION TO OTHER RECIPIENTS

If we come into possession of your credit information, we may (if permitted by law) share your credit information with third parties, including:

- other credit providers
- our related bodies corporate
- organisations that perform debt collection activities on our (or our client’s or other credit provider’s) behalf
- current or prospective guarantors or security providers in relation to credit we may provide to you if we are a lender on record
- mortgage or trade insurers
- rating agencies
- statutory or regulatory bodies
- ombudsman services
- other organisations involved in debt assignment or securitisation arrangements.

(In some circumstances we may require your consent before being able to make such disclosures).

Some of these recipients may be located outside Australia. It is not reasonably practicable to list all of the countries to which your information may be transmitted from time to time.

6. ACCESSING YOUR CREDIT INFORMATION

You are entitled under the Privacy Act to access any credit information a credit provider holds about you. Please note our clients or other credit providers, not us directly, hold your credit information. You may ask to receive your credit information in a particular way and our clients or other credit providers will give it to you in that manner, if it is reasonable and practicable. You can request your credit information in a letter, by telephone or by email. To make a request please contact our Privacy Officer at the address at the end of this document.

Our clients or other credit providers will need to validate the identity of anyone making an access request, to ensure that your credit information is not provided to anyone who does not have the right to it.

If we hold your credit information, we will usually provide you with access within 30 days of a request but in some circumstances it may take longer. We are likely to refer your request to access your credit information to our clients or other credit providers as we typically do not hold or have direct access to your credit information. We will ask our clients or other credit providers to contact you directly in respect of your request.

Your rights to access your credit information are subject to some limitations (for example, we do not have to provide you with access to the extent it would be illegal to do so and we may need to give you access in a way that preserves the confidentiality of any methodology, data analysis methods, computer programs or other information used by us to derive relevant information).

If access is refused, we will give you a notice explaining our decision to the extent practicable and your options.

There is no charge for making an access request but our clients or other credit providers may charge you a reasonable administration fee for providing you with access in accordance with your request.

7. CORRECTING YOUR CREDIT INFORMATION

If you believe that any credit information a credit provider holds about you is incorrect, you have the right under the Privacy Act to request that the credit provider correct your credit information. Our clients and other credit providers, not us directly, hold your credit information.

If you would like to request your credit information be corrected, please contact the Privacy Officer using the contact details below.

We will normally try to resolve correction requests within 30 days of you making such a request (if we have the ability to do so). If we need more time to resolve your request we will notify you in writing and seek your agreement to a longer period. If we consider it necessary in order to deal with your request, we may consult with a CRB or another credit provider. It is likely that our clients or other credit providers (and not us directly) will resolve correction requests.

If our clients or other credit providers do not agree with a request to correct credit information they hold about you, we will give you notice in writing setting out the reasons and the mechanisms available to you to address the decision.

There is no cost involved for you to make a correction request or for the correction of your information.

8. RETENTION AND DE-IDENTIFICATION OF YOUR CREDIT INFORMATION

If you cease to be a borrower under one of our legal title programs, we (or our clients or other credit providers, if the credit information is held by them) will ensure that any credit information we have about you is de-identified and destroyed in accordance with the Privacy Act.

9. COMPLAINTS AND DISPUTES

If you have reason to believe that we have not complied with our obligations relating to your credit information under Part IIIA of the Privacy Act and the Code, you should firstly raise this with Perpetual's Privacy Officer (using the contact details below). We will acknowledge any complaint as soon as possible and, in any event, within 5 days after we receive it.

We will investigate all complaints and aim to resolve them within 30 days. If we cannot resolve your complaint within this period we will notify you setting out the reasons why, specifying a date for an expected resolution and asking your agreement to extend this 30 day period (if you do not agree, we may not be able to resolve your complaint).

If we consider it necessary in order to deal with your complaint, we may consult with a CRB or another credit provider. If, while the complaint remains unresolved, we or our clients or other credit providers are disclosing information subject to the complaint to a third party, we may advise the third party about the complaint.

If we find a complaint justified, we will notify you. If necessary, we will change our policies and procedures to maintain our high standards of performance, service and customer care.

If we fail to deal with your complaint to your satisfaction, you may refer the complaint to the external dispute resolution (**EDR**) scheme below.

Perpetual Limited's EDR scheme is the Australian Financial Complaints Authority (**AFCA**).

You can contact AFCA at:

Australian Financial Complaints Authority

GPO Box 3

Melbourne VIC 3001

Telephone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org

If you are not satisfied with the outcome of the EDR scheme or if you have a complaint about access or correction you can contact the Office of the Australian Information Commissioner at:

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Fax: (02) 9284 9666

Email: enquiries@oaic.gov.au

NEED MORE INFORMATION?

If you have any questions about this policy, if you wish to complain about how we handled credit information about you, or if you wish to access or correct your credit information, please contact Perpetual's Privacy Officer:

Privacy Officer, Perpetual Limited

GPO Box 4172

SYDNEY NSW 2001

Telephone: 02 9229 9000; or

Email: privacy@perpetual.com.au

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