



Max Recovery Credit Reporting Policy- Australia

This Credit Reporting Policy applies to Max Recovery Australia Pty Ltd (referred to in this Policy as "Max Recovery", "we" or "us"). Max Recovery recognises the importance of the credit information and credit eligibility information ('Credit Related Information') we hold about individuals and the trust they place in us.

We are committed to safeguarding your Credit Related Information in accordance with the requirements of the Privacy Act 1988 and the Privacy (Credit Reporting) Code 2014 to the extent applicable to the Credit Related Information.

By explaining our Credit Reporting Policy to you, we hope that you will better understand how we keep Credit Related Information private and secure while using it to provide services and products. This Policy applies in addition to our Privacy Policy which applies to other personal information.

This Policy is applicable to any individual in relation to whom we hold Credit Related Information regardless of how they interact with us (e.g. over the phone or online).

Kinds of Credit Related Information we collect and hold

The kind of Credit Related Information we may collect about you generally includes:

- **Personal Identification information**, including name, address, gender and date of birth
- **Information on consumer credit liability** including information on your past and present consumer credit accounts such as but not limited to the credit provider, the type of account, the opening and closing date of your account, the amount of credit extended to you, certain terms of your account and any repayment details
- **Information on credit applications** including details of previous information requests about you made to credit reporting bodies by credit providers and credit insurers
- **Information on defaults** concerning the amount outstanding by you in connection with consumer credit that remains overdue
- **Information on payment** whereby you have paid the full outstanding amount in relation to where a default listing was advised to a credit reporting body
- **Information on repayment history**, to the extent permitted by law, including the dates and amounts of payments made.
- **Information on new or varied arrangements** in relation to where a new arrangement has been entered into in regards to an overdue payment amount. The new arrangement will contain details as to the varied terms and conditions.
- **Information regarding your personal insolvency** that is recorded in the National Personal Insolvency Index relating to bankruptcy, a debt agreement proposal given or made by you, a personal insolvency agreement or any directions or orders made under the Bankruptcy Act that relates to you.
- **Information on Court proceedings** in the event any judgement has been made against you pertaining to consumer credit

- **Information that is publicly available** pertaining to your credit worthiness
- **Information about a serious credit infringement** in relation to consumer credit has occurred including but not limited to fraudulent activity
- **Information derived from the above** including any credit score or credit risk assessment indicating a CRB's or credit provider's analysis of your eligibility for consumer credit.

How we collect Credit Related Information?

We will collect Credit Related Information directly from you when you:

- Update your Credit Related Information or another person's Credit Related Information held by us;
- Deal with us over the telephone or in person;
- Send us a letter.

On occasions, we may need to collect Credit Related Information about you from third parties. This may include, but is not limited to:

- Another financial institution (for example, the original credit provider on a debt that we have purchased or are considering to purchase);
- The trustee or administrator in relation to an insolvency administration or bankruptcy;
- Our agents and service providers which may be located overseas;
- Publicly available sources including the Internet and telephone directories;
- Credit Reporting Bodies

How we hold Credit Related Information

Your Credit Related Information may be held within our (or our service providers'):

- Premises in paper records;
- Computer systems including email, servers, hard drives and applications; and
- Data storage systems.

Security of Credit Related Information

Max Recovery will take reasonable steps to protect the Credit Related Information it holds from interference, misuse and loss and from unauthorised access, modification or disclosure. In line with our internal authorisation and access policies, employees only have access to information on a need to know basis.

To the extent permitted by law, Max Recovery will take reasonable steps to destroy or permanently de-identify Credit Related Information if it is no longer needed for any purpose for which the information may be used and disclosed under this Policy except in circumstances where Max Recovery is required or authorised to retain such Personal Information (including as a result of the operation of tax, financial services or other applicable law).

Purposes for which we collect, hold, use and disclose Credit Related Information

Max Recovery collects, holds, uses and discloses Credit Related Information about you for purposes reasonably necessary for our business activities and consistently with the requirements in the Privacy Act.

These purposes may include:

- Managing our relationship with you;
- Responding to queries or requests;
- All existing or future due diligence, verification procedures and ongoing account administration (including but not limited to monitoring, screening and sanctions risks assessment);
- Producing our own assessments and ratings in respect of your credit worthiness;
- Performing our administrative operations, including accounting, record keeping, archiving, systems development and testing and staff training;
- Performing control and risk management functions – including monitoring credit exposure, conducting credit checks and audits generally, and anti-money laundering regulatory screening, reporting and monitoring;
- Enhancing operational, technology, finance, compliance and other support function efficiencies;
- Facilitating the recovery of payments owed to us (for example, payments related to an insolvency administration or bankruptcy)
- Handling complaints and managing legal matters and litigation; and
- When considered necessary by Max Recovery or its related bodies corporate to comply with any law, regulation, court order or requirement of a regulatory or self-regulatory body, tax authority or industry body, whether in Australia or another jurisdiction.

There are certain restrictions that apply under the Privacy Act in relation to the circumstances and purposes for which such information may be used or disclosed. Max Recovery complies with these restrictions.

Disclosure to Credit Reporting Bodies

We may disclose your Credit Related Information to credit reporting bodies. Those credit reporting bodies may include that information in reports that they provide to other credit providers to assist them to assess your credit worthiness.

Max Recovery discloses credit information to the following credit reporting bodies:

- **Equifax**

Phone: 13 83 32
Mail: PO Box 964 North Sydney NSW 2059
Website: www.equifax.com.au

- **Illion**

Phone: 1300 734 806
Mail: PO Box 7405 St Kilda VIC 3004
Website: www.checkyourcredit.com.au

- **Experian Australia Credit Services**

Phone: 1300 783 684
Mail: P.O. Box 1969, North Sydney, NSW 2060
Website: www.experian.com.au/

These credit reporting bodies are required to have a policy which explains how they will manage your Credit Related Information. If you would like to obtain a copy of their policies please visit their respective websites or contact them directly.

Certain Rights in Respect to Credit Reporting Bodies

A credit reporting body may use your Credit Related Information to assist a credit provider to market to you by pre-screening you for direct marketing by the credit provider. You have the right to contact the credit reporting body and request then to exclude your Credit Related Information from any permissible direct marketing activities credit providers may request them to perform.

If you reasonably believe you have been or are likely to be a victim of fraud, you may contact a credit reporting body to request that they not use or disclose your Credit Related Information.

Disclosure of Credit Related Information

We may disclose your Credit Related Information to the following parties:

- Your former creditor from whom the debt was purchased;
- Debt administrators and trustees;
- Employees, agents, subcontractors, insurers, consultants, affiliated or unaffiliated providers of outsourced or other services in connection with provision of services or otherwise in connection with the operation of Max Recovery business, including providers of archival, customer contact, banking, payment, delivery, data processing, data analysis, document management, information broking, research, investigation, insurance, website and technology services;
- Lawyers, accountants, business consultants and other professional advisers of Max Recovery;
- Governmental, regulatory, supervisory, law enforcement or similar authority (including tax authority) or industry body in any jurisdiction;
- Any court of competent jurisdiction in defence of claims or enforcement of rights;
- Auditors of Max Recovery;
- An assignee or a proposed assignee of any of Max Recovery's rights or obligations;
- Actual or potential purchasers of parts of our business, and their respective advisers and insurers;
- Any person or organisation who introduces you to us;
- Credit reporting bodies;
- Debt collection agencies;
- Any person to the extent necessary, in our view, in order to carry out the instructions given to us;
- Our related bodies corporate.

In some cases, we may need to disclose your Credit Related Information to overseas recipients. The countries in which these recipients may be located will vary from time to time, but may include Argentina, India, United Kingdom and the United States.

There are certain restrictions that apply under the Privacy Act in relation to the circumstances in which Credit Related Information may be disclosed to overseas recipients and Max Recovery complies with these restrictions.

Access to your Credit Related Information

If at any time you would like to request access to the Credit Related Information we are holding about you, you are welcome to ask us in a form or manner which identifies the nature of the Credit Related Information requested.

Requests can be made to your Max Recovery business contact or the Privacy Officer for the Australian operation of Max Recovery Australia Pty Ltd as follows:

Email: privacy@maxrecovery.com
Phone: 1300 576 005
Mail: Level 18/ 85 Castlereagh Street, Sydney NSW 2000

We will need to verify the identity of anyone making an access request, to ensure that we do not provide your information to anyone who does not have the right to that information.

Generally, we will provide you with access to the Credit Related Information we hold about you within 30 days of the request, but in some circumstances it might take longer.

Under certain circumstances we may not be able to provide you with access to the Credit Related Information we hold about you. Unless we are unable to do so, we will inform you of the reason(s) for refusing access.

We may charge a fee for providing access to your Credit Related Information.

Corrections to your Credit Related Information

We will take reasonable steps to ensure that your Credit Related Information that we collect, use and disclose is accurate, complete and up to date.

If at any time, you find that the Credit Related Information we hold about you is incorrect please advise your Max Recovery Australia contact or our Privacy Officer immediately using the contact details above.

We will endeavour to resolve correction requests within 30 days of your making a request. If we need more time to resolve your request we will notify you and seek your agreement to a longer period.

If you request a correction to the Credit Related Information we hold about you and we consider that we are not able to correct the Credit Related Information in the manner you have requested, then, unless we are unable to do so, we will inform you of the reason(s) for refusing to correct the Personal Information

Complaints

If you wish to make a complaint about our collection, use or disclosure of your Credit Related Information, please contact us as follows:

Email: privacy@maxrecovery.com
Phone: 1300 576 005
Mail: Level 18/ 85 Castlereagh Street, Sydney NSW 2000

We will make every effort to acknowledge your complaint within 1 business day of our receipt and will attempt to provide you our final response within 21 days. There may be situations where we require more time to assess your complaint, such as where it is complicated in nature or we need to obtain information from other parties. Where this is the case, we will provide you with a Delay Notification outlining the reasons we require more time to respond to your complaint.

If you are not satisfied with our response, you may lodge a complaint with:

- *The Australian Financial Complaints Authority:*

Email: info@afca.org.au
Phone: 1800 931 678
Mail: GPO Box 3 Melbourne VIC 3001
Website: www.afca.org.au

- Otherwise you may contact the *Office of the Australian Information Commissioner*:

Email: enquiries@oaic.gov.au
Phone: 1300 363 992
Mail: GPO Box 5212 Sydney NSW 2001
Website: www.oaic.gov.au

Changes to the Credit Reporting Policy

Please note that this Policy may change from time to time. You may at any time request a current copy from your Max Recovery business contact or access it from the Max Recovery web site (www.maxrecovery.com). We encourage you to review our Policy periodically for any changes.

Need more information?

If you have a query concerning how your Credit Related Information is collected and used or in relation to Max Recovery policies, please contact our Privacy Officer using the contact details above. Additional information, including in respect to Part IIIA of the Privacy Act and the Privacy (Credit Reporting) Code, may be found on the Office of the Australian Information Commissioner's web site.

Accessibility:

If you are deaf or have a hearing or speech impairment, you can obtain assistance from the National Relay Service.

Website at <http://relayservice.gov.au>
Phone (TTY): 1800 555 630.