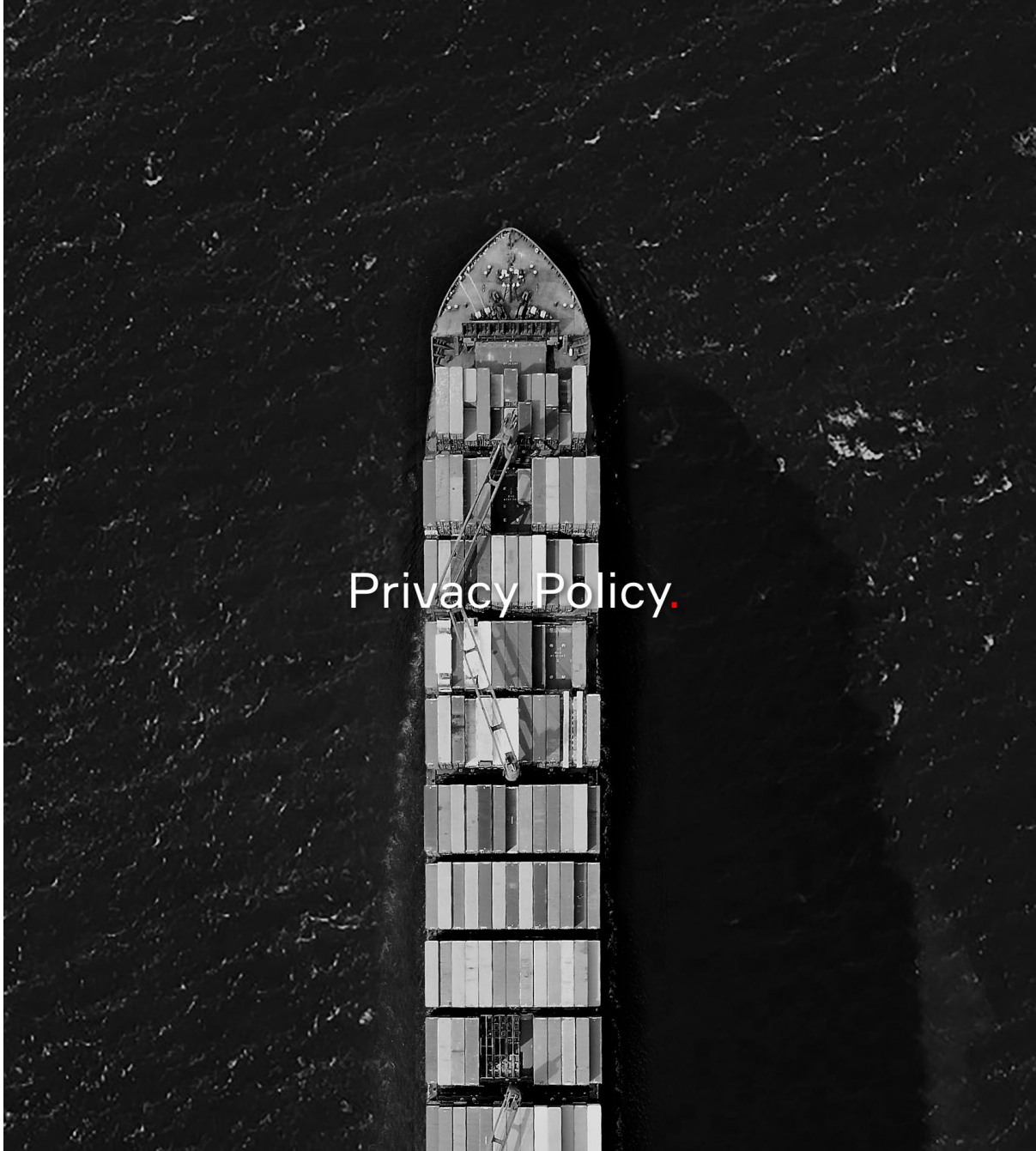




Realise the  
Possibilities.

|                  |                  |
|------------------|------------------|
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| Approved by:     | CEO              |
| Custodian:       | General Counsel  |
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## 1. OVERVIEW OF THIS POLICY

This Policy sets out how we collect, use, disclose and otherwise manage Credit-Related Information.

Our separate Privacy Policy sets out how we collect, use, disclose and otherwise manage other types of personal information, and should be read in conjunction with this Policy.

If you would like a hardcopy of this Policy, please contact AWH's Privacy Officer on 03 5272 9200

## 2. DEFINITIONS

- 2.1. **Credit-Related Information** is used in this Policy to describe some or all information referred to in section 3 of this Policy, as the context requires;
- 2.2. **Policy** means this Credit Reporting Privacy Policy;
- 2.3. **Privacy Act** means the Privacy Act 1988 (Cth) as amended from time to time;
- 2.4. **We, Us, and Our** refer to AWH Pty Ltd (ACN 069 066 842) (ABN 81 069 066 842).

## 3. CREDIT RELATED INFORMATION WE COLLECT

If you apply for services or credit from us, we may collect and hold various information related to your assets and financial position, including income details, expense details, asset values and taxation information.

Credit information is the information we may collect and give to a Credit Reporting Body and take into consideration when you apply for or use credit. This information includes:

- 3.1. identification information, such as age, date of birth, drivers licence number;
- 3.2. information, such as:
  - 3.2.1. the type of credit you have obtained and the terms upon which it was obtained;
  - 3.2.2. the day on which the credit is entered into and the day on which it is terminated or otherwise ceases to be in force;
  - 3.2.3. repayment history information and default information;
  - 3.2.4. scores, ratings, summaries, evaluations and other information relating to your credit worthiness;
- 3.3. certain administrative information relating to credit;
- 3.4. information which has bearing on your creditworthiness which is relevant to evaluating your eligibility for credit, such as:
  - 3.4.1. insolvency information;
  - 3.4.2. credit infringement information;
  - 3.4.3. court judgments made in relation to your past or present credit arrangements.
- 3.5. information derived from receiving credit reports about you (being 'CP Derived Information') and 'Credit Eligibility Information' (as defined in the Privacy Act). Credit Eligibility Information is the information that credit reporting bodies provide to us. CP-Derived Information means any personal information that is derived from information provided to us by a credit reporting body. This could be, for instance, a credit score.

## 4. COLLECTION

We collect Credit-Related Information only by fair and lawful means where it is reasonable and practicable to do so. We do so in order to conduct our business, to provide and market our services and to meet our legal obligations.

If you do not provide us with Credit-Related Information we reasonably request, we may not be able to provide the requested services to you. We also may not be able to provide you with the information about the services that you may want.

#### **4.1. How we Collect Credit-Related Information**

4.1.1. We collect Credit-Related Information that you provide:

- 4.1.1.1. when visiting our website ([www.awh.com.au](http://www.awh.com.au));
- 4.1.1.2. when attending events we may organise, such as auctions;
- 4.1.1.3. in applications or resumes you lodge with us;
- 4.1.1.4. during telephone, or in person, conversations with us; and
- 4.1.1.5. in written correspondence to us (including email correspondence).

4.1.2. We also collect Credit-Related Information provided by other people when it is necessary for a specific purpose, such as checking information that you have given us or where you have consented, or would reasonably expect us, to collect your Credit-Related Information in this way.

4.1.3. If it is unclear to us whether you have consented to the collection of Credit-Related Information from a third party, we will take reasonable steps to contact you to ensure that you are aware of the reason and purpose of the collection.

4.1.4. If we collect Credit-Related Information from a third party, we will inform you that the Credit-Related Information has been collected and the circumstances of such collection.

4.1.5. We will also collect Credit-Related Information about you if we are required to do so under an Australian law. If so, we will inform you of this, including details of the law requiring the collection.

4.1.6. We may also collect Credit-Related Information about you from a range of publicly available sources including newspapers, journals, directories, the internet and social media sites.

#### **4.2. Specific Technology Issues**

It is important that you understand that there are risks associated with use of the internet and you should take all appropriate steps to protect your Credit-Related Information. You can contact us by land line telephone or post if you have concerns about making contact via the internet.

We may use cookies when you visit our website ([www.awh.com.au](http://www.awh.com.au)) and, as a consequence, we may collect certain information from you such as:

- 4.2.1. your browser type;
- 4.2.2. your location;
- 4.2.3. your IP address;
- 4.2.4. information about when and how you use our website; and
- 4.2.5. information about your past internet usage, such as websites you visit before coming to our website and documents you have downloaded.

Our website may contain links to other sites. AWH is not responsible for the privacy practices or the content of any sites linked to our website.

#### **4.3. Unsolicited Credit-Related Information**

Where we receive unsolicited Credit-Related Information about you, we will check whether that Credit-Related Information is reasonably necessary for our functions or activities. If it is, we will handle this Credit-Related Information in the same way we do other Credit-Related Information we seek from you. If not, we will destroy or de-identify it.

**5. REASON FOR COLLECTION & USE**

We collect, use and hold your Credit-Related Information:

- 5.1. to determine payment terms for the services we provide;
- 5.2. for day to day administration purposes; and
- 5.3. to satisfy our legal obligations.

**6. DISCLOSURE**

We may disclose Credit-Related Information about you to Credit Reporting Bodies and debt collection companies where you are in payment default. We will only make a disclosure in these circumstances if we have given you written notice of our intention to disclose and at least 14 days has passed since giving you such notice.

The types of Credit-Related Information that we may disclose includes:

- 6.1. identification information; and
- 6.2. information that you have defaulted on a payment due to us and the amount of the default.

We will not disclose Credit-Related Information, including Credit Eligibility Information, about you unless you have authorised the disclosure or it is otherwise in accordance with Australian law.

We may disclose Credit-Related Information to our related entities.

We do not generally store Credit-Related Information overseas, but we may disclose Credit-Related Information to Credit Reporting Bodies and other parties overseas. The location of any overseas-based Credit Reporting Bodies or other parties will be any country where you are conducting business that is directly related to the services for which you have engaged, or propose to engage us.

**7. SECURITY & MANAGEMENT**

We take reasonable steps to protect your Credit-Related Information against misuse, interference, loss, unauthorised access, modification and disclosure. The protective steps we take include:

- 7.1. confidentiality requirements of our employees;
- 7.2. document storage security policies;
- 7.3. security measures for restricted access to our systems; and
- 7.4. deletion, destruction or de-identification of Credit-Related Information where it is no longer required by us.

**8. CORRECTION**

We aim to ensure that the Credit-Related Information we hold is accurate, complete and up-to-date. We encourage you to contact us in order to update any Credit-Related Information we hold about you. Our contact details are set out at the end of this Policy.

If you contact us regarding an apparent inaccuracy in relation to your Credit-Related Information and we are satisfied that the Credit-Related Information is inaccurate, out-of-date, incomplete, irrelevant or misleading, then reasonable steps will be taken to correct the Credit-Related Information within 30 days, or a longer period as we agree with you in writing.

We will not charge you for a correction.

If we determine that the correction is not required, we will provide you with written notice stating the reasons why the correction was not made and refer you to our complaints procedure.

If a correction is made to any Credit-Related Information that was previously disclosed to a third party, as long as it is reasonable to do so, we will give each such recipient written notice of the correction within a reasonable period. We will also notify you that the correction has been made.

**9. ACCESS TO YOUR CREDIT-RELATED INFORMATION**

You are entitled to access your Credit-Related Information held by us.

If you wish to access your Credit-Related Information, you must lodge a request for access by contacting AWH's Privacy Officer by post at AWH Pty Ltd, PO Box 283, Lara, Victoria, 3212; or by email on [jda@awh.com.au](mailto:jda@awh.com.au).

We may charge a fee to cover our reasonable costs in meeting an access request. You will be provided with access to your Credit-Related Information within 30 days of the request (unless unusual circumstances apply).

We are not required to give you access to your Credit-Related Information if:

- 9.1. it would be unlawful to do so; or
- 9.2. denying access is required or authorised by Australian law or a court/tribunal order; or
- 9.3. to do so would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If we do not give you access to your Credit-Related Information you will receive written notice that explains the reason for the refusal.

**10. COMPLAINTS**

Complaints about alleged breaches by us of the Privacy Act, the APPs, the Credit Reporting Code or this Policy can be made by contacting AWH's Privacy Officer, by post at AWH Pty Ltd, PO Box 283, Lara, Victoria, 3212; or by email [jda@awh.com.au](mailto:jda@awh.com.au). If you do not consider that your complaint has been adequately dealt with by us, you may make a further complaint to the Office of the Australian Information Commissioner, which has complaint handling responsibilities under the Privacy Act.

**11. ACCESS TO THIS POLICY**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

The most current version of this Policy will be uploaded to our website ([www.awh.com.au](http://www.awh.com.au)) or can be obtained by contacting our Privacy Officer:

E-Mail: [jda@awh.com.au](mailto:jda@awh.com.au)

Phone: 03 5272 9200

Postal Address: PO Box 283, Lara, Victoria, 3212

**12. FURTHER INFORMATION**

If you have any questions about privacy-related issues please contact our Privacy Officer.

For further information about privacy, the protection of privacy and credit reporting can also be found on visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au)