

# Credit Information Management Policy & Consent

Hargraves Secured Investments Limited ACN 089 001 267 (**us, we, our**) takes your privacy seriously and is committed to responsible privacy practices.

Please read the following credit information management policy (**Credit Information Management Policy**) to understand how your credit information and credit eligibility information is collected, used, disclosed, stored, handled and protected by us as a credit provider.

This Credit Information Management Policy should be read alongside our broader Privacy Policy (**Privacy Policy**).

## Consent

By signing this document, you consent to us, our related bodies corporate, affiliates and agents and other entities collecting, using, holding and disclosing credit information about you. We may seek and obtain further personal information (including sensitive information) and credit information about you during the course of our dealings with you. The terms of this consent apply to the collection, use and disclosure of that information.

If you do not provide us with this consent or provide us with your personal information or credit information we may not be able to arrange credit for you or provide other services.

## What is credit information and credit eligibility information?

Credit information is a type of personal information about an individual that is governed by Part IIIA of the *Privacy Act 1988* (Cth) (**Privacy Act**). In general terms, credit information means personal information that has a bearing on credit that has been provided to you or that you have applied for, whether as an individual, a sole trader or a business and includes both credit for personal, domestic or household purposes as well as business-related credit. It can include information that identifies you, about the amount(s) you have borrowed, your repayments and any defaults. It can also cover information about you as a guarantor of any credit or as an insured party under a credit related insurance policy.

Credit eligibility information, as it relates to you, is also defined in the Privacy Act and relates to credit reporting information (such as a credit report and/or credit score) disclosed to us, as a credit provider, by a credit reporting body (such as Equifax] (**CRB**), as well as any information that a CRB derives from any credit information it holds about you.

## What types of credit information and credit eligibility information do we collect and hold?

The types of credit information and credit eligibility information we collect and hold about you can include information about:

- your credit information, such as the type of credit being sought, the credit amount, credit terms and contract start and end dates;
- your personal information, such as your Australian Passport, state or territory drivers licence, Medicare card, citizenship certificate, birth certificate, and any other identification documents;
- depending upon the type of credit sought, your financial information reasonably requested by us;
- your financial statements, payslips, income tax assessment notices/tax returns;

- your involvement in court proceedings about a credit agreement you have or have applied for;
- your repayment history;
- your default information (where the default is \$150 or more and is at least 60 days overdue);
- your credit history and eligibility;
- your credit worthiness;
- your financial hardship information;
- new payment arrangements we have entered with you following payments you missed or were delayed in paying;
- any proposed or actual insolvency agreement registered in your name in the National Personal Insolvency Index (or equivalent);
- serious credit infringements or any instances of attempted or actual fraud committed by you in relation to a credit application or agreement;
- information from a CRB, such as your credit report and a credit score that a CRB assigns to you regarding your credit worthiness and risk of default, as well as any information we derive from this information;
- alerts from a CRB about any of your accounts that may pose a significant risk of default, as well as any information we derive from this information;
- information other credit providers provide about you or someone else; and
- other information relating to any risk you may have of defaulting on a loan.

Your credit information and credit eligibility information are linked to your account with us and stored in electronic record keeping methods in our secure databases.

### **How do we collect credit information and credit eligibility information?**

We collect your credit information directly from you, including when you submit an application with us for credit. Where it is reasonable and practicable to do so, we will only collect credit information about you from you directly and not from third parties.

However, to assess your credit application, we may also collect credit information and credit eligibility information about you from a CRB or another credit provider. In limited circumstances, we may also collect credit information about you from publicly available sources (such as the Internet) and from third parties such as from your credit referees (if any).

Whilst we will always maintain robust privacy practices, we are not responsible for the privacy practices of third parties, including CRBs, so you should review their relevant privacy policy to satisfy yourself as to how they protect and handle your credit information.

### **What kinds of information do we derive from credit reporting information disclosed to us by a CRB?**

Generally, we derive the following information from credit information (and information a CRB derives from the credit information they hold about you) that is disclosed to us by a CRB in accordance with applicable laws:

- whether you can afford to repay the money we lend you;
- the amount of money we should lend you;
- the chances that you will not repay us;
- the chances of recovering any amount you owe us;
- whether we should approve your credit application;
- whether you're eligible for a financial hardship variation to your trade credit application or further financial hardship variation;
- the plausibility of your occupation, income, expenditure and net asset position and other financial information in your trade credit application; and/or
- whether we should lend you money.

### **Can you choose not to disclose your credit information?**

If we cannot collect credit information about you or if you use a pseudonym, we will not be able to assess your credit application or provide the assistance you require. For example, we will not be able to process your application if you do not provide the credit amount you are seeking.

### **Why do we collect, hold, use or disclose your credit information and credit eligibility information?**

In addition to the uses set out in our Privacy Policy, we collect, hold, use or disclose your credit information and credit eligibility information for purposes that include to:

- verify your identity;
- assess your application for credit;
- collect any overdue payments for credit;
- assess whether to accept you as a guarantor for an application for credit;
- communicate with you, and to address any issues or complaints that we or you may have regarding our credit relationship;
- to pre-screen your credit score in order to proceed with an application for credit;
- to request a CRB to undertake a pre-screening of a list of individuals using and meeting the eligibility criteria nominated by us for the purposes of marketing and promotions of our products and services;
- provide you with credit (if your application is approved);
- to assist us in assessing any financial hardship application you make;
- to comply with our obligations to report to a CRB (including disclosing information such as the date you took out your credit and closing date, your credit limit, the type of trade credit or other loan, any joint applicants, your repayment amount and frequency, any repayments you have missed, any overdue repayments that you have brought up to date, defaults on your credit that are \$150 or more and at least 60 days overdue where we've issued you with a written notice asking you to pay us, financial hardship information, payment arrangements or other arrangements you have agreed with us such as a personal

insolvency agreement, serious credit infringements, as well as any updates to any of these);

- determine the infringement, where we have received from any CRB information that suggests that you have committed a serious credit infringement, prevent, detect and investigate suspicious, fraudulent, criminal or other activity that may cause you, us or others harm, including in relation to our products and services;
- comply with our legal obligations such as notifying you of matters that we may be required by law to do so; and/or
- contact you regarding any of the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

We may also use or disclose your credit information and credit eligibility information for administrative, planning, quality control and for other purposes to which you have consented, or as otherwise permitted or required by law.

We disclose your credit information to the following CRBs. You may be able to get a free copy of your credit report and information about their policies on management of credit related personal information by contacting each respectively, below:

Name	Website	Telephone	Mailing Address
Equifax	<a href="http://www.equifax.com.au/personal/products/my-credit-file">www.equifax.com.au/personal/products/my-credit-file</a>	138 332	GPO Box 964 North Sydney NSW 2059
CreditorWatch	<a href="https://creditorwatch.com.au/">https://creditorwatch.com.au/</a>	N/A	CreditorWatch, GPO Box 276, Sydney, NSW, 2001.

We are also required to collect your personal information to comply with our obligations under Australian law, including the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

### What do the CRB's do with your information?

A CRB may use your credit information to assess your credit worthiness and may also use it in reports that are then provided to other licensed credit providers, debt collection agencies and/or other third party companies to help them assess whether to provide you with credit.

Our sharing of information about your missed payments and defaults with CRBs may impact your credit worthiness and your ability to obtain credit in the future. We will only do this as authorised by law including if you miss a payment in your credit agreement, where you have defaulted on your credit agreement, or where you make a serious credit infringement. We may also disclose this information as well as a copy of your credit report and your credit application to the relevant guarantor for your credit. We will also provide updates to CRBs on any payments we receive after we disclose missed payments and defaults.

The CRB's identified above also offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called "credit pre-screening". You have the right to request that the CRB's do not use your personal information for this purpose. To opt out of credit pre-screening, contact the relevant CRB, using the contact details on their websites noted above.

## **Where you are (or are likely to be) a victim of fraud**

If you reasonably believe that you are a victim of fraud or are likely to be a victim of fraud, you can request that a CRB does not use or disclose your credit information.

ASIC's Money Smart website also contains useful information on credit reporting and can be found at: [www.moneySMART.gov.au/borrowing-and-credit/borrowing-basics/credit-reports](http://www.moneySMART.gov.au/borrowing-and-credit/borrowing-basics/credit-reports). You can also find out more about [credit reports at the CreditSmart website](#).

## **To whom do we disclose credit information and credit eligibility information?**

We may disclose your credit information and credit eligibility information to third parties in certain situations in connection with the purposes described above.

This may include disclosing your credit information and credit eligibility information to the following types of third parties:

- our related companies;
- finance brokers, mortgage managers, and persons who assist us to provide our products to you;
- any person or entity who represents you including financial consultants, accountants, lawyers, mortgage brokers, persons holding power of attorney, guardians and advisers;
- CRBs (such as those listed above);
- other credit providers;
- any person who proposes to guarantee or has guaranteed repayment of any credit provided to you, or who indemnifies you in any way;
- any borrower or prospective borrower of credit that you guarantee or propose to guarantee
- any investors, agents or advisers, trustees, ratings agency or businesses assisting us with funding for credit made available to you or any entity that has an interest in your finance or our business;
- entities to whom we outsource some of our functions or that provide information and infrastructure systems;
- trade insurers, other insurers, valuers and debt collection agencies;
- auditors, insurers and re-insurers;
- any of our associates, related entities or contractors such as claims related providers including assessors and investigators that help us with claims;
- associated businesses that may want to market products to you;
- other financial institutions (for example to process a claim for mistaken payment);
- any organisation providing online verification of your identity;
- any potential third party acquirer of our business or assets, and advisors to that third party;
- our professional advisers (such as lawyers, accountants or auditors) and (solely, mortgage or trade) insurers;

- third parties to whom you have authorised us to disclose your information (e.g. referees or account nominees);
- any industry body, government authority, tribunal, court or otherwise in connection with any complaint regarding the approval or management of your lease or loan - for example if a complaint is lodged about us; and/or
- any other person as required or permitted by law.

If we disclose your credit information or credit eligibility information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your credit information or credit eligibility information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with any authorised party to which we disclose your credit information or credit eligibility information. For the avoidance of all doubt, we will never disclose your credit report to any landlord, employer, real estate agent or insurance company (other than as identified above).

### **Does credit information or credit eligibility information leave Australia?**

We do not disclose credit information or credit eligibility information to entities that do not have an Australian link.

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

We implement reasonable measures to protect and safeguard your credit information and credit eligibility information from misuse, interference and loss, unauthorised access, modification or disclosure.

We maintain physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

### **How long do we keep your credit information and credit eligibility information?**

Generally, we will retain your credit information and credit eligibility information for the period necessary for the purposes for which your credit information and credit eligibility information was collected (as outlined in this Credit Information Management Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute.

### **How can you access and correct your credit information or credit eligibility information?**

You may request access to any credit information or credit eligibility information we hold about you at any time by contacting us. We will provide access to that information after verifying your identity and in accordance with the Privacy Act, subject to any exemptions that may apply.

If you believe that credit information or credit eligibility information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us.

We will notify you about a decision made regarding your request within a reasonable period of the decision. Where we agree that the information needs to be corrected, we will update it within 30 days from the date you made the request, or such other longer period as agreed between us. If we do not agree, you can request that we make a record of your correction request with the relevant information.

You can also ask us to notify any third parties that we provided incorrect information to about the correction.

## How to contact us

If you have a query, concern or complaint about the manner in which your credit information or credit eligibility information has been collected or handled by us or would like to request access to or correction of the credit information or credit eligibility information we hold about you, you may contact us using the details provided below:

Hargraves Secured Investments Limited

Address: 18 Orr St, Yarrowonga, VIC, 3730

Email: [accounts@hargrave.com.au](mailto:accounts@hargrave.com.au)

We are committed to resolving any complaints reasonably and to ensuring that we are doing the right thing by our customers. We will make all reasonable inquiries and your complaint will be assessed with the aim of resolving any issue in a timely and efficient manner. We will acknowledge your complaint within 1 day, or as soon as practicable, and provide you a response within 45 days, or such other longer period as agreed between us.

## Further Questions?

If you have raised a complaint with us and you are unsatisfied with the outcome or have further concerns about the way we handle your credit information or credit eligibility information, under the Privacy Act, you may complain to the Information Commissioner at the Office of the Australian Information Commissioner, whose contact details are set out below:

Office of the Australian Information Commissioner  
Address: GPO Box 5218 Sydney NSW 2001  
Phone: 1300 363 992  
Online: [www.oaic.gov.au](http://www.oaic.gov.au)  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

You may also complain to the Australian Financial Complaints Authority (AFCA) if you are not satisfied with our response to your credit complaint, who can be contacted at:

Australian Financial Complaints Authority  
Address: GPO Box 3, Melbourne, VIC 3001  
Phone: 1800 931 678 (free call within Australia: 9:00am–5:00pm AEST/AEDT weekdays)  
Online: [Contact us | Australian Financial Complaints Authority \(AFCA\)](#)  
Email: [info@afca.org.au](mailto:info@afca.org.au)

## Changes to this Credit Information Management Policy

We may change or update this Credit Information Management Policy from time to time to keep up to date with legal requirements and the way we operate our business. An up-to-date version of this Credit Information Management Policy is available at any time at [www.hargrave.com.au](http://www.hargrave.com.au). You are responsible for reviewing this Credit Information Management Policy periodically and informing yourself of any changes. We suggest that you check back regularly. If we make significant changes to our Credit Information Management Policy, we will seek to inform you by notice on our website or by email.

**Last Updated:** 9<sup>th</sup> December 2024

## Consent

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I consent to the collection, holding, use and disclosure of my personal information and credit-related information as set out above.

Borrower (1):

Date:

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Borrower (2):

Date:

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Guarantor (1):

Date:

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Guarantor (2):

Date:

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