

### 1 Policy Purpose

The Citywide Group of Companies (“Company”, “we” “us”) want to familiarise individuals with how we collect and use credit information relating to you in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Credit Reporting Code (**CR Code**). The Company is a credit provider for the purposes of the Privacy Act.

The Privacy Act and this Credit Reporting Policy do not apply to commercial credit provided to companies or other entities. However, this policy will apply where an individual applies for commercial credit or we request that a director or other authorised individual guarantees the commercial credit to be provided by us to a company or other entity. This policy will only apply in respect of any uses of individual’s credit-related information as part of any assessment of the creditworthiness of that individual that we undertake and any consideration that we undertake in relation to an individual’s suitability as a guarantor.

You obtain credit from us when we agree to suspend, or defer payment for our goods or services. By engaging Citywide as a supplier of goods or services to you or becoming a guarantor of a customer of Citywide, you are taken to have read, and agreed to the collection, use, disclosure and handling of your credit information in accordance with this Credit Reporting Policy.

### 2 Introduction

This Credit Reporting Policy describes our practices with information we collect and hold regarding individuals when providing credit as described below;

- Consumer Credit
  - Information that we collect and hold about individuals when providing credit to those individuals for services or products for personal, family or household purposes
- Commercial Credit
  - Information that we collect and hold about individuals who are directors of a company, when providing credit to that company
  - Information that we collect and hold about individuals who supply a personal guarantee to us in relation to the debt of a company to us and;
  - Information that we collect and hold about individuals who are obtaining that credit for their own business purposes

### 3 Information Collected

The Company will collect Credit Information about you when you apply for and/or obtain credit from us.

**Credit information** has the meaning given to that term in the Privacy Act and includes, amongst other things, identification information, consumer credit liability information, repayment history information and default information about an individual.

The Credit Information that we may collect and hold includes information such as;

- Your name
- Business name
- Directors’ details
- Date of Birth
- Postal address
- Contact details
- Driver’s license number and
- Business structure

It also includes information about your credit arrangement with us, when you are required to make payments and information about whether you have met your obligations to repay your credit or satisfy your guarantee.

We may obtain this information from you or from third parties such as credit reporting bodies and other credit providers.

For consumer credit we may obtain credit reports in relation to individuals for the purpose of assessing credit applications, (including to make changes to the level of credit granted or to extend any terms of existing credit), from such persons and may use those reports in the course of providing them with credit.

For commercial credit we may obtain credit reports in relation to individuals for the purpose of assessing credit applications, (including to make changes to the level of credit granted or to extend any terms of existing credit), from such persons or companies of which they are a director and also to assess whether to accept a guarantee from an individual.

If you or your company defaults on a credit arrangement with us, we may obtain other information about you from credit reporting bodies to assist us to contact or locate you. We may also obtain information about your assets to determine your ability to repay that credit.

#### 4 How we use and disclose your information

We use the Credit Information that we collect about you for the primary purpose of providing you (or the company of which you are an officer or a guarantor) goods and services. We also use the Credit Information for credit account management and administrative purposes. If you choose not to provide certain information, we may not be able to provide you or your company with the goods or services that you require.

For consumer credit, we may also use credit information to determine whether to provide you with credit, or to obtain additional information from credit reporting bodies to determine whether to provide you with credit, or to collect payments that are overdue.

For commercial credit, we may use credit information we hold about you to determine whether to provide you or your company with credit, to accept you as a guarantor of that credit, or to obtain additional information from credit reporting bodies to determine whether to provide you or the company of which you are a director with credit, or to collect payments that are overdue. We may also report how you or your company repays credit, and defaults in payment terms or guarantee commitments to credit reporting bodies. We may also disclose your Collected Information to any other guarantor of your obligation to us.

We currently work with Dunn & Bradstreet as a credit reporting body for all these purposes. You can contact Dunn & Bradstreet Client Services Centre at PO Box 7405 St Kilda Road Melbourne 3004, phone: 13 23 33 or email: [clientservices@dnb.com.au](mailto:clientservices@dnb.com.au). Further contact details can be found at [www.dnb.com.au](http://www.dnb.com.au). We may collect Credit Information (including repayment history information and credit eligibility information) from, and disclose Credit Information (including repayment history information and credit eligibility information) to, Dunn & Bradstreet or other credit reporting bodies.

We may also use this information we collect about you for these additional purposes:

- The Company may make your information available to **third party service providers** to assist us with management of your account. Such providers include debt collection agencies, other credit providers and data storage service providers. The Company requires these service

providers to comply with relevant privacy laws and not to use information for any other purpose than the specific service they are providing to the Company.

- **To protect the rights of the Company and others.** There may be instances when the Company may disclose your information, including situations where the Company has in good faith belief that such disclosure is necessary to:
  - protect, enforce, or defend the legal rights, privacy, safety or property of our Company, employees, agents and contractors;
  - protect the safety, privacy and security of users of the Company services or members of the public;
  - protect against fraud;
  - comply with the law or legal process in any country; or
  - respond to requests from public and government authorities.

**To complete a merger or sale of assets.** If the company sells all or part of its business or makes a sale or transfer of assets, the Company may transfer or disclose your information to the party or parties involved in the transaction as part of any due diligence processes which take place in contemplation of a potential transaction

We will not use or disclose credit reporting information about you for the purpose of direct marketing, unless permitted by law, and if permitted by law, only unless you have not opted out of such use.

## 5 How we protect your Credit Information

The Company uses commercially reasonable administrative, technical, personnel and physical measures to safeguard information in its possession against loss, theft and unauthorised use, disclosure or modification.

We will retain your information for the period necessary to fulfill the purposes outlined in this Credit Reporting Policy.

We have the following security measures in place to protect your information:

- all systems are protected by a combination of ICT security measures including permission based password protected access to information and appropriate firewall systems;
- our offices are monitored regularly by a security service;
- our website and servers are protected by a firewall; and
- our employees agree to confidentiality when they begin employment with us and this agreement is ongoing.

## 6 How to access or seek correction of your Credit Information

If you would like to access, review, correct or update your information, you may contact us as outlined in section 8 of this policy. In your request, please include your email address, name, address and telephone number and specify clearly what information you would like to access, review or correct. We will need to share your information with others who can assist in responding to your request. We will try to respond to your request as soon as reasonably practicable. We will give you access to, or correct, your information unless there is a lawful reason for refusing your request for access or correction, including (in relation to a request for correction of information) if we are not satisfied that your information is

inaccurate, out-of-date, incomplete, irrelevant or misleading. If we deny access in any circumstance or cannot correct or update your information we will give you a written notice explaining our reasons for that refusal and details of the relevant complaints procedure. We may consult with a credit reporting body or another credit provider when determining if your information is inaccurate, incomplete, out-of-date, irrelevant or misleading.

We will, within a reasonable time of correction, notify you, and any parties to whom we had previously provided the information to, that we have corrected the information.

## 7 Other Information

### Update to Credit Reporting Policy

- The Company may modify this Credit Reporting Policy at any time. We will publish any updated Credit Reporting Policy on our website.

### Location of data

- Some of the technology used to provide you with goods and services are hosted in and outside of Australia. These third party hosts may be located in a range of different countries, including the United States, Australia, New Zealand, India and Singapore who store data for us.

### Complaints

- If you think we have breached the Privacy Act the CR Code, you may complain to us by contacting us as outline in section 8 below. We will contact you within 7 days to let you know the next steps in resolving your complaint and obtain any further information we need to consider your complaint. We may consult with a credit reporting body or another credit provider about the complaint. Within 30 days of the date you made the complaint, we will let you know of our decision in writing. If you are not satisfied with our response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner. Further information is available at [www.oaic.gov.au](http://www.oaic.gov.au).

## 8 How to contact us

If you have any questions about this Credit Reporting, or concerns about the information we currently hold about you, please contact our Group Risk & Assurance Manager at:

Email: [citywide@citywide.com.au](mailto:citywide@citywide.com.au)

Mail GPO BOX 4969 Melbourne 3001

Phone: (03) 9261 5001

## 10 Glossary

Citywide Group of Companies means Citywide Service Solutions Pty Ltd (ABN 94 066 960 085) or any of its subsidiaries (within the meaning of “subsidiary” as defined in section 9 of the Corporations Act 2001 (Cth)), including but not limited to:

- Sterling Group Services Pty Ltd (ABN 26 002 767 204)
- Technigro Pty Ltd (ABN 88 011 043 646)