

CREDIT REPORTING AND CREDIT RELATED PERSONAL INFORMATION POLICY

Purpose

This is the credit reporting and credit related personal information policy of Australian Vintage Limited ABN 78 052 179 932 and our related entities.

The purpose of this policy is to be a clearly expressed and up to date policy about the management of credit related personal information (which means credit information, credit reporting information, credit eligibility information and/or regulated information) (**Credit Information**) including the collection, holding, use and disclosure of such information.

This policy is intended to enhance the transparency of our company's operations, notify you of your rights and our obligations and provide information regarding:

1. the kinds of Credit Information which we will collect and hold;
2. how we will collect, hold, use and disclose Credit Information;
3. the purposes for which we collect, hold, use and disclose Credit Information;
4. how an individual may access Credit Information about the individual that is held by us and seek correction of such information;
5. how an individual may complain about a breach of the Credit Reporting Privacy Code (**CRC**) and how we intend to deal with any such a complaint;
6. whether we are likely to disclose Credit Information to an overseas recipient; and
7. if we are likely to disclose Credit Information to overseas recipients, the countries in which such recipients are likely to be located (if it is practical to do so).

Acknowledgment

We acknowledge that we must take reasonable steps when handling Credit Information.

Whilst we cannot warrant that this policy will be followed in every instance, we will endeavour to follow this policy on each occasion. Our company has educated and trained our employees with the compliance requirements and have appropriate procedures in place to manage Credit Information.

This policy sets out how we comply with our obligations under the Privacy Act 1988 (as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*) (the **Act**) and the CRC.

The kind of Credit Information we will collect and hold

We collect and hold the following types of Credit Information.

1. Current and prior names and addresses, age and occupation, (including employer details).
2. Driver's licence number.

3. Details regarding applications for commercial credit including the type and amount of credit requested and the fact that we have assessed an application.
4. Details regarding the provision of credit, the amount and whether any other credit was previously provided.
5. The date that any agreement in relation to credit ceased or was terminated and the surrounding circumstances.
6. Repayment history.
7. Details regarding payment owed to us or any other credit provider, in connection with credit provided to you or in relation to which you are a guarantor, overdue for more than 60 days.
8. Whether in our opinion, or another credit provider's opinion, you have committed a serious credit infringement.
9. Whether you have entered into arrangements with us or other creditors in connection with the credit provided to you.
10. Court proceedings information, personal insolvency information and credit related publically available information.
11. Any information regarding your credit worthiness.
12. Any administrative information about credit accounts of yourself and your related bodies corporate.

How we will collect, use and disclose your Credit Information

Our usual practice will be to collect Credit Information from you (or your authorised representative) directly and with your written consent.

In some circumstances, we may collect Credit Information from a third party. This may include the collection of Credit Information from a Credit Reporting Body (**CRB**).

As indicated above, we will endeavour to obtain your written consent regarding the collection and further disclosure of Credit Information from and to a CRB.

It may be necessary for us to collect your Credit Information for a specific purpose such as an investigation of a complaint.

We may be required to in some circumstances, if you fail to meet payment obligations or commit serious credit infringement to disclose your Credit Information to a CRB.

We will attempt to use the Credit Information we collect and hold for the primary purpose(s) in respect of which it is collected.

How we will hold the Credit Information we collect, use and disclose

We will hold the Credit Information in a manner which is secure and protected from unauthorised access.

Your information may be held in either a physical form or in electronic form on our IT system.

We take steps to protect the information against the modification, disclosure or misuse by including such things as password protection for accessing electronic IT systems and physical restrictions.

We will also take steps to ensure our service providers have protection for electronic IT systems and other necessary restrictions.

We will endeavour to ensure that our relevant staff are trained with respect the security of the Credit Information we hold and we will restrict any access where necessary.

Once information is no longer required, we will take all reasonable steps to either destroy and de-identify the Credit Information in a secure manner and where possible destroy and delete records.

In the event we hold Credit Information that is unsolicited and we were not permitted to collect it, the Credit Information will be destroyed as soon as practicable.

The purpose for which we collect, hold, use and disclose your Credit Information

We may collect, hold, use and disclose your Credit Information as reasonably necessary so that it may be used directly for the functions or activities of our company and as permitted by law.

We may use your Credit Information for the functions or activities of our company to:

1. consider whether to provide you or a related entity with credit, or accept you as a guarantor;
2. consider your credit worthiness;
3. provide information to CRB's and participate with other the credit reporting system recognised by the CRC;
4. take debt recovery action and enforcement where necessary to recovery amounts against guarantors or where infringements have occurred; and/or
5. consider and address any complaints and comply with our statutory requirements.

Disclosure to CRB's

As indicated above, we may disclose Credit Information to a CRB in accordance with the permitted disclosures as defined under the Act, including instances where you fail to meet your payment requirements and you commit a serious credit infringement.

We may disclose your Credit Information to the following CRB's listed below.

Veda Advantage
Level 15, 100 Arthur Street
NORTH SYDNEY NSW 2060
Tel: 1300 921 621

NCI
Level 2, 165 Grenfell St
ADELAIDE SA 5000
Tel: 1800 882 820

Dun & Bradstreet
Level 2,
143 Coronation Drive
MILTON QLD 4064
Tel: 07 3360 0600

Creditor Watch
Level 13, 109 Pitt Street
SYDNEY NSW 2000
Tel: 1300 501 312

Experian
Level 6, 549 St Kilda Road
MELBOURNE VIC 3004
Tel: 03 9699 0100

A copy of the credit reporting policy for the CRB's listed above will be available on their website or will be provided in hard copy upon request.

A CRB may use your Credit Information to assist with our marketing by "pre-screening" for direct marketing.

In accordance with recent changes within the Act we are unable to use your Credit Information for direct marketing, however a CRB may be able to "pre-screen" you and provide you with an opportunity to opt out of direct marketing.

You can tell the CRB that you do not want your Credit Information used for this purpose.

You are entitled to also place a 21 day ban on the sharing of you Credit Information, if you believe you have become a victim of credit fraud.

Disclosure of your Credit Information to other recipients

We may choose to, if permitted by law, share and/or disclose your credit information with third parties including:

1. other credit providers;
2. our related companies;
3. debt collection organisations;
4. guarantors or security providers in relation to the credit we provide you;
5. debt assignment organisations; and
6. credit insurers.

In some instances we will require your written consent prior to making such disclosures. We typically obtain this consent in terms of our costs agreement or via our privacy statement.

How can you access your Credit Information

You are entitled to access your Credit Information held in our possession.

We will endeavour to respond to your request for Credit Information within a reasonable time period and as soon as practicable in a manner as requested by you. We will normally respond within 30 days.

You can make a request for access by sending an email or letter and addressed to our Privacy Officer, details specified below.

The Privacy Officer
275 Sir Donald Bradman Drive
COWANDILLA SA 5033
Phone: 08 8172 8341
Fax: 08 8172 8399
Email: CRelations@australianvintage.com.au

With any request that is made we will need to authenticate your identity to ensure the correct person is requesting the information.

You will only be granted access to your Credit Information where we are permitted or required by law. We are unable to provide you with access that is unlawful.

We will not charge you for making an access request, however if reasonable we may charge you with the costs associated with your access request.

In the event your access request is refused we will provide you with written notice regarding the refusal and reasons for our decision.

Correction

Should we hold Credit Information that is incorrect, you have the right to make us aware of this fact and request that the incorrect information be corrected.

If you would like to make a request to correct your information please contact our Privacy Officer on the details provided above.

In assessing your request we will need to be satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will then take all reasonable steps necessary to ensure that it is accurate, up to date, complete, relevant and not misleading.

It is our normal request to try and resolve any correction requests within 30 days. If we are to require further time we will notify you in writing and seek your consent.

If it is the case we do not agree to correct your Credit Information as per your request we will notify you in writing and provide you with our written reasons for the refusal.

Record keeping

We will endeavour to keep a record of where all Credit Information is used or disclosed.

The types of matters recorded by us include the following.

1. Where Credit Information is destroyed to meet obligations and compliance requirements in accordance with the CRC and the Act.
2. Where we have received Credit Information from another credit provider:
 - (a) the date in which it was disclosed;
 - (b) a brief description of the information disclosed; and

- (c) to whom the disclosure was made.
3. Records of any consent provided by an individual for purposes of disclosure.
 4. Records of any correspondence and actions taken in relation to notifications or corrections, complaints, pre-screening, monitoring and auditing.

We will maintain our records for a minimum period of 5 years.

Complaints

In the event that you wish to make a complaint about a failure of us to comply with our obligations in relation to the CR Code or the Act please raise this with our Privacy Officer on the contact details above.

We will provide you with a receipt of acknowledgment as soon as practicable.

We will then endeavour to respond to your complaint and attempt to resolve the issues within 30 days, unless otherwise specified.

In dealing with your complaint we may need to consult a CRB, or another credit provider, or a third party.

If we fail to deal with your complaint in a manner that you feel is appropriate you may choose to report your complaint to an external dispute resolution scheme (**EDR Scheme**).

We note that we are currently not a member of any EDR Scheme and we are exempt from having to be a member of any EDR Scheme until March 2015.

If you are not satisfied with the process of making a complaint to our Privacy Officer you may make a complaint to the Information Commissioner. Details of which are below.

Office of the Australian Information Commissioner
GPO Box 5218 Sydney NSW 2001
Email: enquiries@oaic.gov.au
Telephone: 1300 363 992
Facsimile: 02 9284 9666

The Information Commissioner can decline to investigate a complaint on a number of grounds including:

1. where the complaint wasn't made at first to us;
2. if the Information Commissioner considers the complaint has already been dealt with by a recognised EDR scheme; or
3. if the complaint would be more effectively or appropriately dealt with by a recognised EDR scheme of which we are a member.

Disclosure to overseas recipients

We may choose to, if permitted by law, share and/or disclose your Credit Information with recipients outside of Australia.

We are required to notify you with a list of any countries which Credit Information may be transmitted to, or disclosed where it is practical for us to do so.

At this point in time, we may share and/or disclose any Credit Information to overseas recipients in countries including the UK and the USA.

If you have any queries regarding our credit reporting policy or wish to find out more regarding any of our privacy policies, please contact our Privacy Officer on the details listed above.