



1. Commitment to Privacy

PF Group Holdings Pty Ltd group of companies (the Group) respect your privacy and are committed to protecting it. The Group are bound by the *Privacy Act 1988* and the Credit Reporting Code 2014 (the CR Code).

2. Scope

The Group's Credit Reporting Policy applies to all companies within the group who do not hold a Current Australian Credit Licence. Companies with an ACL are covered by the Credit Reporting Policy – ACL. Where 'GROUP' is used it is limited to the companies within this scope.

3. Purpose

The purpose of this Credit Reporting Policy is to inform you about how the Group manages your credit information and credit eligibility information.

4. Credit Information and Credit Eligibility Information

"Credit information" includes personal information such as:

- Identification information such as your name, address, date of birth and employer.
- Consumer credit liability information which is information about your consumer credit accounts.
- A note that an information request has been made with a credit reporting body to access your credit file.
- The type of consumer credit or commercial credit, and the amount of credit, sought in a loan application by you.
- Default information which is a credit default that may be included on your credit file if you have a payment that is more than 60 days overdue.
- Payment information which is a notation added to your credit default that your account has been paid.
- New arrangement information which is a notation added to your credit default indicating that the terms and conditions around the repayment of the amount due has been varied.
- Court proceedings information which is a judgment or order that has been made against you.
- Personal insolvency information which is whether you are bankrupt or subject to a personal insolvency agreement.

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- Publicly available information about you:
 - i. that relates to your activities in Australia or the external Territories and your credit worthiness; and
 - ii. that is not court proceedings information about you or information that is entered or recorded on the National Personal Insolvency Index; or
- The opinion of a credit provider that you have committed a serious credit infringement in relation to consumer credit.

“Credit eligibility information” means information such as credit information that is disclosed to a credit provider by a credit reporting body, as well as information that is derived from this information.

5. Kinds of credit information that the Group collect and hold

The kinds of credit eligibility information that the Group collects and holds about you include:

- identification information;
- consumer credit liability information;
- information requests;
- default information;
- payment information;
- new arrangement information;
- court proceedings information;
- personal insolvency information;
- publicly available information and;
- serious credit infringement information.

We store your credit information that we collect electronically in our secure internal customer management system.

6. How the Group collects credit information

The Group collects this information from:

- you or your authorised representative during the course of the Group’s dealings with you, which includes the transactions you make (or do not make) with the Group and actions that a Group entity may take such as initiating legal action;

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- from your initial credit providers for example, when the Group's entities purchase a debt from them (or are considering purchasing a debt from them);
- credit reporting bodies.

7. Kinds of credit eligibility information the Group holds

The kinds of credit eligibility information Group entities hold about you, includes credit information (of the kind listed above) that is disclosed to a Group entity by credit reporting bodies.

8. How Group entities hold your credit information and credit eligibility information

The Group understands that the security of your credit information and credit eligibility information is important to you, so the Group take steps to protect it from misuse, interference, loss and from unauthorised access, modification or disclosure that include:

- training staff on the appropriate handling of personal information; and
- restricting access to the Group's computer systems, physical records and premises to authorised personnel; and
- protecting the Group's technology equipment with appropriate security measures such as firewalls and encryption.

The Group take steps to destroy or permanently de-identify personal information if it is no longer required for any purpose. In the event that the Group inadvertently come into possession of credit information and credit eligibility information that is not relevant to Group's functions or activities, the Group will destroy that information.

9. The kinds of information the Group obtain from credit reporting information

The kinds of information that the Group obtains from credit reporting information are your updated identification information such as your name, address and employer, and information about whether or not you have met your obligations with credit providers.

10. Purpose of the collection use and disclosure of credit information and credit eligibility information

The Group collects, holds, uses and discloses your credit information and credit eligibility information so that the Group can undertake its functions and activities efficiently and effectively. The Group's functions and activities include purchasing debts from creditors such as

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telecommunication companies, utility providers, recovering debt either for, or on behalf of, others.

11. Accessing your credit eligibility information

You can request access to your credit eligibility information by submitting a request and a copy of your driver's licence, or another form of government identification to our Resolutions Team. We will provide you with a copy of your credit eligibility information within a reasonable period after the request is made, usually within 30 days. In some cases, we may charge a reasonable fee to provide access to your credit eligibility information, but we will never charge you to make a request. If a fee applies, we will advise you before we provide access. In certain circumstances we are not required to provide access to credit eligibility information if:

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

We will notify you in writing if we are unable to provide access to your credit eligibility information. You may raise a complaint with the Office of the Australian Information Commissioner if we refuse to provide access to your credit eligibility information. The details for this body will be provided in our written response and are also outlined in section 15.

12. Seeking correction of your credit information or credit eligibility information

We will take reasonable steps to correct inaccurate or out-of-date credit information (e.g., default listings), credit reporting body derived information or credit provider derived information upon request. If you believe the credit information and credit eligibility information that we hold about you is incorrect, please contact our Resolutions Team. We will not charge you for your request to correct your credit information credit reporting body derived information or credit provider derived information. Once we receive your correction request a written response will be provided within a reasonable period after the request is made, usually within 30 days. If we establish that your credit information credit reporting body derived information or credit provider derived information is incorrect or out of date, we will correct the information free of charge. If we are unable to correct your credit information and credit eligibility information, we will advise you of this in writing and provide the reasons.

Credit derived information means any personal information that is derived from the information provided to us by a credit reporting body.

13. Complaints

If you have any concerns about how we have managed your credit information and credit eligibility

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information, you can:

- speak with the Collection Officer managing your matter; or
- request to speak with our Resolutions Team at any time; or
- contact our Resolutions Team directly; or
- contact the relevant External Dispute Resolution scheme (if applicable); or
- contact the Office of the Australian Information Commissioner.

We encourage you to give as much detail about your complaint as possible. You will not be charged to make, or for us to deal with a complaint under Part IIIA of the Privacy Act or the Credit Reporting Code.

We take complaints seriously and will provide a written response within 30 days or such longer period as you agree to in writing.

In the circumstances where the complaint relates to information that has been destroyed, we are secured by the Data Retention and Destruction Policy to keep information for a specific amount of time, not being obligated to keep it for longer than the specified at the Privacy Policy and Anti-Money Laundering and Counter Terrorism Financing Act 2006

14. Resolution Team – Contact Details

Australian Receivables Management

Phone: (07) 9709 3708

Email: resolutions@armcollect.com.au

Mail: PO BOX 552, Toowong DC, QLD, 4066

State Mercantile

Phone: (1300) 087 006

Email: resolutions@statemercantile.com.au

Mail: PO BOX 388, Toowong DC, QLD, 4066

Billchaser

Phone: (1300) 224 273

Email: support@billchaser.com.au

Mail: PO BOX 388, Toowong DC, QLD, 4066

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15. Complaints to external bodies

For Australia:

Office of the Australian Information Commissioner

Phone: 1300 363 992

Website: www.oaic.gov.au

Telecommunications Ombudsman (TIO)

Phone: 1800 754 004

Website: www.tio.com.au

Energy and Water Ombudsman Western Australia (EWOWA)

Phone: 1800 754 004

Website: www.ombudsman.wa.gov.au/energyandwater/

ACT Civil and Administrative Tribunal

Phone: 02 6207 1740

Website: www.acat.act.gov.au

Energy and Water Ombudsman Victoria (EWOV)

Phone: 1800 500 509

Website: www.ewov.com.au/

Energy and Water Ombudsman New South Wales (EWON)

Phone: 1800 246 545

Website: www.ewon.com.au/

Energy and Water Ombudsman Queensland (EWOQ)

Phone: 1800 662 837

Website: www.ewoq.com.au

Energy and Water Ombudsman South Australia (EWOSA)

Phone: 1800 665 565

Website: www.ewosa.com.au

Energy and Water Ombudsman Tasmania (EWOT)

Phone: 1800 001 170

Website: www.energyombudsman.tas.gov.au

For New Zealand:

Privacy Commissioner

Phone: 0800 803 909

Website: www.privacy.org.nz

16. Overseas disclosures of your credit information or credit eligibility information

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We may need to disclose certain information to overseas recipients from time to time to perform certain functions and activities. We take the necessary steps to ensure that personal information is protected when it is disclosed overseas. We may disclose your information to our clients, contractors or service providers in overseas countries including (but not limited to) New Zealand (for those not in New Zealand), Australia (for those not in Australia) and the Philippines. If we have reason to believe that you are located overseas, we may disclose your information to our overseas agent in that country to assist us in performing our functions and activities.

17. Changes to this policy

This Credit Reporting Policy will be reviewed on an annual basis. The current version will be published on our website. If you request a copy of our policy in an alternative form, we will take reasonable steps to provide you with a copy in the format of your request.

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