

# Credit Reporting Policy

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Gippsreal Limited  
ACN 005 443 292

AFSL 219612

ACL 219612

## Record of Document Changes

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Review Date	List of Changes	Authorised Person Signature

# Credit Reporting Policy

Dated 19 March 2024

## Purpose

- A. As part of the Gippsreal Limited ACN 005 443 292 (**the Fund**) process to ensure that it continues to maintain the highest levels of professional integrity and ethical conduct, the Fund has adopted this Credit Reporting Policy (**Policy**) to guide and direct the Fund's approach to Credit Reporting.
- B. The key objective of this Policy is to ensure that the Fund complies with its legal and ethical obligations in respect of Credit Reporting.
- C. This Policy is also intended to set out how we collect, use, disclose and otherwise manage credit related personal information.
- D. This Policy is to be read in conjunction with our Privacy Policy which is also located on our website [[www.gippsreal.com.au](http://www.gippsreal.com.au)].

## Operative provisions

### 1. Definitions

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#### 1.1 Definitions

In this document

TERM	DEFINITION
ACL	means Australian Credit Licence.
AFSL	means Australian Financial Services Licence.
The Fund	means Gippsreal Limited ACN 005 443 292 and any related bodies corporate that might exist from time to time.
Compliance Officer	means the Employee(s) who are responsible for managing the compliance of the Fund.
Employee	means any of the Fund employees, representatives, officers or directors.

TERM	DEFINITION
Representative	<p>means any Fund Employee who:</p> <p>(a) deals in the credit services products authorised under the Fund's ACL or AFSL; or</p> <p>(b) is listed on ASIC's register as an Authorised Representative of the Fund's ACL or AFSL (where applicable).</p>
Responsible Manager or RM	<p>means any individual nominated on the Fund's ACL or AFSL as being responsible for significant day-to-day decisions about the Fund's credit services business.</p>

## 2. This Policy

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### 2.1 Effective Date

This Policy is effective from the above date.

### 2.2 Supersedes

This document supersedes all previous documents, practices, and policies relevant to Credit Reporting.

### 2.3 When does this Policy apply?

- (a) Policy applies to all RMs, directors, officers and Employees of the Fund at all times, and the requirements remain in force on an ongoing basis.
- (b) This Policy represents the standards which apply throughout the Fund. Where the Fund relies on a third party for compliance with this Policy, the Fund must ensure that such reliance is permissible under and complies with the applicable law and is consistent with this Policy.

### 2.4 Policy Review

This Policy will be reviewed on at least an annual basis by the RM of the Fund, having regard to the changing circumstances of the Fund. The RM will then make any changes as necessary to ensure the ongoing compliance of this Policy.

## 3. What is Credit Information?

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### 3.1 Credit Information

- (a) Credit information is personal information that has a bearing on credit that you have applied for, or credit that has been provided to you. This includes:
  - (i) credit for personal, domestic or household purposes; and
  - (ii) credit in connection with a Fund.
- (b) It can also cover information about you as a guarantor of a loan or as an insured party under a credit related insurance Policy.

## 4. Reporting of Credit Information

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- 4.1 If you apply for credit from us, we may collect and hold various information related to you.
- (a) We also collect and use all types of 'Credit Information', 'credit eligibility information' and 'CP-derived information,' as defined in the *Privacy Act 1988* (Cth) (**Privacy Act**).
  - (b) We may collect and give your Credit Information to a Credit Reporting Body (**CRB**). The CRBs we deal with are:
    - Equifax
    - GlobalX

### 4.2 The role of CRB's

For contact details and information on how CRBs manage credit related personal information, please see their privacy policies available on their websites.

## 5. Information we may collect about you

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### 5.1 Types of Credit Information

The information we collect includes:

- (a) identity details;
- (b) basic information about your credit account (for example, when it was opened);
- (c) payments information;
- (d) details about information requests we or other credit providers make about you to a CRB;
- (e) information about certain overdue payments and serious credit infringements as well as information about payments or subsequent arrangements in relation to either of these;
- (f) various publicly available information like bankruptcy, insolvency and credit-related court judgements;
- (g) the fact that you have applied for services from us; and
- (h) the fact that we are a credit provider to you.

### 5.2 CRB's Credit Information

- (a) 'Credit eligibility information' is the information CRBs provide to us. Primarily, this information relates to your dealings with other credit providers including:
  - (i) banks;
  - (ii) other financial institutions; or
  - (iii) other organisations that may provide you with credit in connection with their products or services.

- (b) Credit Information may also include certain credit worthiness information that we derive from the data that we receive from a CRB.
- (c) Occasionally, we may also collect credit eligibility information about you from other credit providers. The information we can receive from a CRB has been extended as part of our comprehensive credit reporting (see below).
- (d) 'CP-derived information' means any personal information that is derived from information given to us by CRBs and that has bearing on your credit worthiness. This could be, for example, a credit score.

### **5.3 Credit Information**

In this Policy, we refer to 'credit information' to capture some or all information referred to above (as the context requires).

## **6. Why is Credit Information Collected?**

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### **6.1 The main reason we collect, use, hold and disclose Credit Information is to provide you with products and services.**

- (a) This includes:
  - (i) checking whether you are eligible for the product or service;
  - (ii) providing the product or service;
  - (iii) helping manage the product or service; and
  - (iv) checking your identity.
- (b) We use information from CRBs to confirm your identity, assess your application for credit, manage our relationship with you and collect overdue payments. We may also use this information as part of reaching our own internal assessment of your creditworthiness.

### **6.2 Acting as a Guarantor**

If you are offering to act as guarantor, your Credit Information may be necessary to assess whether the borrower will be eligible for a loan with you acting in that position.

### **6.3 Other uses of Credit Information**

- (a) We may also use your Credit Information for other purposes. For example:
  - (i) to comply with legislative or regulatory requirements in any jurisdiction;
  - (ii) prevent fraud, crime or other activity that may cause harm in relation to our products or services; and
  - (iii) help us run our business.
- (b) We may also use your Credit Information to inform you on products or services we think may interest you, subject to legal restrictions on using this type of information for marketing purposes.

## **7. How do we hold credit Information?**

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### **7.1 Secure Data Centres**

- (a) Much of the information we hold about you will be stored electronically in secure data centres located in Australia. Some information we hold about you will be stored in paper files.
- (b) We use a range of physical and electronic security measures, such as locks and passwords, to protect the security of the Credit Information we hold. We also train our employees to keep information secure.

## **8. Who do we disclose your Credit Information to, and why?**

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### **8.1 The way we approve and manage credit involves a range of tasks.**

- (a) Some tasks are carried out for us by third party service providers, both in and outside Australia.
- (b) In carrying out these tasks, service providers may have access to credit related personal information. To protect your Credit Information, the Fund enters into contracts with the service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the Credit Information we disclose to them for the specific role we ask them to perform.

### **8.2 Disclosure to CRB's**

- (a) When we exchange your Credit Information with CRBs, this information is used to:
  - (i) validate your identity;
  - (ii) assess your credit application; and
  - (iii) manage your account with us.
- (b) When you submit an application for a product with the Fund, we will obtain a credit report on you from a CRB. This may occur at any time after you commence your application. The enquiry will be listed in your credit file that is maintained by the relevant CRB.

### **8.3 Disclosure to Third Party's**

Generally, we disclose Credit Information to organisations that help us with our business. These may include:

- (a) our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- (b) credit representatives who sell products and services on our behalf;
- (c) other organisations, who jointly with us, provide products or services to you;
- (d) other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, funds managers and portfolio service providers;
- (e) organisations involved in our funding of loans (including securitisation trustees, investors and their advisers);

- (f) credit reporting bodies;
- (g) organisations that provide us with insurance to cover our lending risks;
- (h) The Fund's financial advisers, accountants, legal advisers or auditors;
- (i) your representatives (including your legal adviser, financial adviser, accountants, executor, administrator, guardian, trustee, or attorney);
- (j) government agencies or dispute resolution schemes that assist consumers in relation to credit; and
- (k) where permitted by law, debt collection agencies or other lenders, such as where you have given mortgage security over the same property to us and another lender.

We may also disclose your Credit Information to others outside the Fund where:

- (a) we are required or authorised by law;
- (b) where we have a public duty to do so;
- (c) you have expressly consented to the disclosure;
- (d) the consent may be reasonably inferred from the circumstances; or
- (e) we are otherwise permitted to disclose the information under the Privacy Act.

#### **8.4 Repayment Loan History**

As permitted under the Privacy Act, we may participate in repayment history reporting as part of our 'comprehensive credit reporting.' When we receive a loan application, we may receive information about whether the applicant has a history of making required repayments on time and whether any have been made after they are due.

#### **8.5 Inclusion of Relevant Dates**

For all borrowers, we may periodically report the same information to CRBs. As part of our comprehensive credit reporting, we may also disclose the date an account is opened and closed, credit limits and the type of credit. Such information may also be provided by a CRB.

#### **8.6 More Information**

- (a) For more information about comprehensive credit reporting, please visit [creditsmart.org.au](http://creditsmart.org.au).
- (b) If you are having trouble making your repayments, we can help. Please contact [justin@gippsreal.net.au](mailto:justin@gippsreal.net.au) for a confidential conversation about your situation.

### **9. Access to and correction of Credit Information**

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#### **9.1 Gaining Access to Credit Information**

- (a) You can request access to Credit Information that is held by us. You can also ask to correct any inaccurate information we hold or have provided to others. To do so, please contact us with an explanation and materials outlining the inaccuracy.

- (b) There is no fee for requesting that your Credit Information is corrected or for us to make the corrections. In processing your request for access to your Credit Information, a reasonable cost may be charged. This charge covers, for example, locating the information and supplying it to you.

## **9.2 Refusal to Provide Access**

- (a) There are some circumstances in which we are not required to give you access to your Credit Information or certain types of Credit Information as requested by you.
- (b) If we refuse to give you access to or refuse to correct your Credit Information, we will give you a notice explaining our reasons, except where it would be unreasonable to do so.
- (c) If we refuse your request to correct your Credit Information, you also have the right to request that a statement be associated with your Credit Information noting that you disagree with its accuracy.
- (d) If we refuse your request to access or correct your Credit Information, we will also provide you with information on how you can complain about the refusal.

## **10. Resolving your Credit Information concerns and complaints – your rights**

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### **10.1 Concerns and Complaints**

- (a) If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us under the Australian Privacy Principles, please contact us.
- (b) We will acknowledge your complaint as soon as we can after receipt of your complaint. We will contact you if any further information is required to resolve your complaint.
- (c) We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days, but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

### **10.2 If you are unhappy with our response, there are other bodies you can go to.**

The Australian Financial Complaints Authority (AFCA) can consider most privacy complaints involving providers of credit services. AFCA can be contacted at:

Australian Financial Complaints Authority  
GPO Box 3 Melbourne VIC 3001

Phone: 1800 931 678  
Website: [www.afca.org.au](http://www.afca.org.au)

Under the Privacy Act, you may complain to the Office of the Australian Information Commissioner (OAIC) about the way we handle your personal information. The OAIC can be contacted at:

GPO Box 5218 Sydney NSW 2001

Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## **11. Contact us**

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11.1 If you would like more information about how we protect your privacy, please contact us using the details below:

Email: [info@gippsreal.net.au](mailto:info@gippsreal.net.au)

Phone: (03) 5662 2529

## **12. Changes to the Credit Reporting Policy**

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### **12.1 Where to find Changes to the Credit Reporting Policy**

We may change the way we handle your Credit Information from time to time for any reason. If changes occur, we will update this Policy. The most recent version is available on [www.gippsreal.com.au](http://www.gippsreal.com.au).