

CORPORATE POLICIES

CP35. CREDIT REPORTING POLICY

Rondo Group of Companies (including Rondo Building Services Pty Ltd (ABN 69 000 289 207)) (**Rondo, we or us**) respects your privacy and is committed to protecting the privacy of your personal information.

This Credit Reporting Policy explains how Rondo deals with credit-related information (as defined below) in accordance with Australian and New Zealand privacy requirements. You are welcome to print or download this Credit Reporting Policy at any time at <https://www.rondo.com.au/about/general-information/credit-reporting>.

Rondo abides by Part IIIA of the *Privacy Act 1988* (Cth) (**AU Privacy Act**), the provisions of the *Privacy Act 2020* (New Zealand) (**NZ Privacy Act**) where applicable, the *Privacy (Credit Reporting) Code 2014* (version 2.3) and the *Privacy Regulation 2013* (Cth) (together, the **Credit Reporting Laws**). This Policy includes notifiable matters that must be disclosed to you under the AU Privacy Act. However, a separate Statement of Notifiable Matters as required by the AU Privacy Act may be accessed at <https://www.rondo.com.au/about/general-information/credit-reporting>.

This Credit Reporting Policy applies to our collection, use and disclosure of credit-related information. Unless you give us your consent to do otherwise, we will only collect, use and disclose your credit-related information in accordance with this Credit Reporting Policy. Our collection, use, management and disclosure of personal information (other than credit-related information) are generally governed by our Privacy Policy available at <https://www.rondo.com.au/about/general-information/privacy-policy>.

By using Rondo's services or submitting credit-related personal information to Rondo, you accept the terms of this Credit Reporting Policy, and consent to our use, collection, disclosure and retention of credit-related information, as described in this Credit Reporting Policy.

If you do not agree to any provisions in this Credit Reporting Policy, you should not disclose any credit-related information to Rondo.

What kind of credit-related information does Rondo collect?

The information Rondo collects, holds and derives can be grouped into categories of information as defined in the AU Privacy Act, including "**credit information**", "**credit eligibility information**" and "**CP derived information**".

In this Policy, we use the term "**credit-related information**" to refer to "**credit information**", "**credit eligibility information**" and "**CP derived information**".

The kinds of "**credit information**" Rondo collects from you and holds may include:

- identification information, including your name (and any former names or aliases), address (and former addresses), date of birth, gender, current or last known employer and driver's licence number;
- details of your credit history with us (including any repayments that you have missed, late repayments that you have made and information about whether you have met your obligations to repay your credit or satisfy your guarantee);
- information about any credit provided to you by credit providers (including financial institutions, utilities or telecommunications providers);
- details of any bankruptcy or insolvency applications that relate to you; and
- details of any credit-related court proceedings that relate to you.

The kinds of "**credit eligibility information**" that we hold may include a credit report or credit assessment score that has been provided to us by a credit reporting body ("**CRB**").

The kinds of "**CP derived information**" that we usually derive from credit reporting information disclosed to us by a CRB may include internal credit assessment checks and scores.

Why does Rondo collect credit-related information?

The purposes for which we collect your credit-related information may include:

- to assess any application that you make to us for credit (or which is made by your related entity, such as a company of which you are a director);

- to conduct appropriate checks for credit-worthiness, including disclosing credit information to CRBs and then receiving from CRBs credit reporting information about you (such as a credit report);
- to administer and manage the products and services we provide to you, including to collect payments that are owed to us in relation to any credit that we have provided to you or your related entity;
- where you have offered to guarantee credit, to assess whether to accept your guarantee and the risk of you being unable to meet your obligations;
- to disclose to a third party that you have asked to act as a guarantor of any credit provided to you or your related entity;
- to disclose credit reporting information to other credit providers which provide or are considering providing credit to you or to your related entity;
- to deal with access requests, complaints or regulatory matters relating to credit or credit reporting; and
- as required or authorised by law or otherwise as permitted under the Credit Reporting Laws.

If you choose not to provide us with credit-related information, we may not be able to process your application for credit and/or provide you or your related entity with access to the Rondo commercial credit service.

How do we collect your credit-related information?

We usually collect credit information in the following ways:

- directly from you, either in person, in documents (such as application forms), by email or via the Rondo website at www.rondo.com.au;
- from third parties, including CRBs, Solicitors or Mercantile Agents or Credit risk providers, other credit providers or your representatives;
- from publicly available resources; and
- from our own records of how you purchase products from Rondo.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your credit-related information.

How do we store your credit-related information?

We hold credit-related information in hard copy and electronic files.

If your credit-related information is no longer needed, Rondo will take reasonable steps to destroy or permanently de-identify it.

How do we protect your credit-related information?

We take all reasonable steps to protect your personal information (including credit information and credit eligibility information) from misuse, loss and unauthorised access, modification or disclosure. These include:

- using appropriate information technology and processes;
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do;
- protecting paper documents from unauthorised access or use through security systems we deploy over our physical premises;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or “de-identifying” personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods; and
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

Whilst we take reasonable measures, no data transmission over the Internet can be guaranteed as fully secure and accordingly, we cannot guarantee or warrant the security of any information you send to us using our online forms or products. You submit information over the Internet at your own risk.

To whom may we disclose credit-related information?

We will only disclose credit-related information for the purpose for which it was collected or in the following circumstances:

- to Credit Reporting Bodies;
- to Solicitors or Mercantile Agents or Credit risk providers, other credit providers, for credit-related purposes such as creditworthiness, credit rating and credit provision;
- where you consent, or have authorised a third party to consent to the disclosure;
- to a guarantor or proposed guarantor named in your commercial credit service application form; or
- where required or authorised by law or otherwise as permitted under the Credit Reporting Laws.

Cross-border disclosure of credit-related information

Rondo is unlikely to disclose your credit-related information to overseas recipients. However, should we disclose your credit-related information to overseas recipients, we will do so in accordance with this Credit Reporting Policy, and as applicable, the AU Privacy Act or NZ Privacy Act.

If credit-related information is disclosed to overseas recipients, the countries in which the credit-related information is received may not have data protection laws equivalent to those in force in Australia and/or New Zealand (as applicable).

You acknowledge and agree to such international data and information transfers with respect to credit-related information.

Individuals in Australia

Clause 8.1 of the Australian Privacy Principles contained in Schedule 1 of the AU Privacy Act provides that if Rondo discloses personal information (including credit-related information) about an individual to an overseas recipient, then Rondo must take such steps as are reasonable in the circumstances to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to such information.

An exception to this is if we obtain your consent. We intend to rely on this exception in the following way. Unless you notify us in writing to the contrary, you will be taken to have consented to the disclosure by us of personal information (including credit-related information) to overseas recipients on the basis that:

- clause 8.1 of the Australian Privacy Principles will not apply to such disclosure;
- the individual whose personal information is disclosed will not be able to seek redress under the AU Privacy Act;
- the overseas recipient may not be subject to any privacy obligations or to any principles similar to the Australian Privacy Principles;
- the individual may not be able to seek redress in the overseas jurisdiction; and
- the overseas recipient is subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

How do we keep credit-related information accurate and up-to-date?

We will take reasonable steps to ensure that all credit-related information we hold is:

- accurate, complete, up-to-date, relevant and not misleading;
- stored in a secure environment; and
- protected from misuse, interference and loss as well as unauthorised access, modification or disclosure.

Disclosure of credit-related information to Credit Reporting Bodies (CRBs)

If you apply for credit or offer to act as a guarantor, Rondo may exchange certain credit-related personal information with CRBs. Rondo deals with the following CRBs in connection with the above activities:

Equifax Pty Ltd
Customer Resolutions Team
PO Box 964, North Sydney NSW 2059
<https://www.equifax.com.au>
13 8332

CreditorWatch Pty Ltd
GPO Box 276, Sydney, NSW, 2001
<http://creditorwatch.com.au>
1300 501 312

Your credit-related information may be used by CRBs to include in reports provided to credit providers (such as Rondo) to assist such providers to assess your credit-worthiness.

The CRB will have its own Privacy Policy and Credit Reporting Policy to govern its use, collection, disclosure and management of your personal information (including credit-related personal information).

If you would like more information about how Equifax and CreditorWatch manage credit-related information, please see the Equifax Privacy Policy available at <https://www.equifax.com.au/privacy> and the Creditor Watch Privacy Policy available at <https://creditorwatch.com.au/page/privacy>.

Individuals in Australia

You have the right to request a CRB not to use your credit reporting information for the purposes of pre-screening for direct marketing by a credit provider.

You also have the right to request a CRB not to use or disclose credit reporting information about you, if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

How can you access and correct your credit-related information?

You have a right to access the credit eligibility information that we hold about you.

We will comply with any request to access your credit eligibility information that you send us by email at the email addresses set out in the "**How do you contact us?**" section below, except where the Credit Reporting Laws allow us to refuse to do so.

To the extent not prohibited by applicable law, we may charge you a reasonable fee for our costs associated with providing you with access and retrieval costs.

You also have the right to ask us to correct credit-related information about you that is inaccurate, incomplete, out-of-date, irrelevant or misleading. If we refuse to correct your credit-related information as requested, we must within a reasonable period and in accordance with any obligations under Credit Reporting Laws:

- notify you in writing that the correction has not been made and the reasons for not correcting the information; and
- inform you that if you are unsatisfied with our response to your request, you may access a recognised external dispute resolution scheme of which Rondo is a member or make a complaint to the Australian or New Zealand Privacy Commissioner (as applicable).

What if you have a complaint?

You may wish to contact us to ask questions about how we deal with your credit-related information. You may also complain about any failure by us to comply with the Credit Reporting Laws.

If you wish to ask questions about how we deal with your credit-related information or if you consider that any action of Rondo breaches this Credit Reporting Policy or the Credit Reporting Laws, you can make a complaint.

Internal processes

In the first instance, please direct your complaint to the particular Rondo Branch concerned – they are likely to be in the best position to deal with the matter quickly and effectively. Each Rondo branch has an officer appointed to handle complaints. Please refer to the details in the "**How do you contact us?**" section below.

If the particular Rondo branch is unable to deal with a privacy complaint to your satisfaction, please contact the Human Resources by email, phone, facsimile or post. For complaints about privacy, we will establish in consultation with you a reasonable process, including timeframes, for seeking to resolve your complaint.

External processes

You may also elect to contact the applicable Privacy Commissioner if you have a complaint about the way we handle your personal information at:

- Office of the Australian Information Commissioner, whose contact details are found on the website <http://www.oaic.gov.au/>.
- Office of the New Zealand Privacy Commissioner, whose contact details are found on the website <https://www.privacy.org.nz/>.

You can also obtain information about the Australian Credit Reporting Laws and your privacy rights at the "Credit reporting" page of the website of the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/privacy-law/privacy-act/credit-reporting>.

How do you contact us?

<p>1 Human Resources Rondo Building Services Pty Ltd PO Box 324 St. Marys NSW 1790</p>	<p>Tel: 02-9912 7392 Fax: 02-9912 7361 Email: HR@rondo.com.au</p>
<p>2 Rondo Building Services Pty Ltd 1 Columbia Court Dandenong South VIC 3175 Tel: 03-85612222 Fax: 03-85612266 Email: Office.VIC@rondo.com.au</p>	<p>3 Rondo Building Services Pty Ltd Lot 512, Binary Street Yatala QLD 4207 Tel: 07-32874944 Fax: 07-32871881 Email: office.QLD@rondo.com.au</p>
<p>4 Rondo Building Services Pty Ltd 39 George Street Greenfields SA 5107 Tel: 08-82605566 Fax: 08-83495449 Email: Office.SA@rondo.com.au</p>	<p>5 Rondo Building Services Pty Ltd 15 Glassford Road Kewdale WA 6105 Tel: 08-92519400 Fax: 08-92519414 Email: Office.WA@rondo.com.au</p>
<p>6 Rondo Building Services Pty Ltd 1/118 Savill Drive Mangere East Auckland 2024 NZ Tel: +64-9-6365110 Fax: +64-9-6365111 Email: Rondo.NewZealand@rondo.co.nz</p>	<p>7 Rondo Building Services Pty Ltd 57-87 Lockwood Road, Erskine Park NSW 2759 Tel: 1300 137 742 Fax: 1300 137 743 Email: Office.NSW@rondo.com.au</p>

Updates to this Credit Reporting Policy

This Credit Reporting Policy will be reviewed from time to time to take account of new laws and technology changes to our operations and practices and the changing business environment.

All credit-related information held by Rondo will be governed by Rondo's most recent policy.

Changes to this Credit Reporting Policy will be published by posting an updated Credit Reporting Policy on the Rondo website.

Therefore, you should review Rondo's Credit Reporting Policy regularly to ensure you are familiar with any changes. If you are unsure whether you are reading the most current version, please contact us.

Your continued use of the Rondo Website or Rondo's services after any changes to this Credit Reporting Policy are posted will be taken as acceptance of those changes.



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Gareth Hirst
EXECUTIVE GENERAL MANAGER