

Experian Australia Credit Services Pty Ltd



Report detailing the findings of a review conducted pursuant to clause 24.2 of the *Privacy (Credit Reporting) Code 2014*

16 June 2017

Release date	16 June 2017
To	Experian Australia Credit Services Pty Ltd
From	Keypoint Law
Object	The review will be limited to assessing Experian's compliance with CRB-specific obligations of the <i>Privacy Act</i> and CR Code. It will not assess Experian's compliance with general privacy obligations in relation to personal information that is not credit reporting information, CP derived information or pre-screening assessments.
Report author	Andrea Beatty Consulting Principal Keypoint Law t: +61 2 8042 1861 m: +61 405 592 257 e: andrea.beatty@keypointlaw.com.au w: www.keypointlaw.com.au w: www.andreabeatty.com.au

Table of contents

Glossary.....	3
Executive Summary.....	4
1. Introduction.....	4
2. Background and report objectives.....	4
3. Conclusion.....	5
Detailed observations.....	6
1. Policy about the management of credit reporting information.....	6
2. Collection of credit information.....	7
3. Use and disclosure of credit reporting information.....	8
4. Quality of credit reporting information.....	10
5. Access to credit reporting information.....	12
6. Corrections.....	13
7. Security.....	15
8. Complaints.....	17
9. Information retention and destruction.....	18
10. Qualifications and assumptions.....	19
Attachment 1 Documents examined by Keypoint Law in compiling this report.....	20
Attachment 2 Interviews Conducted by Keypoint Law in compiling this report.....	22
Attachment 3 Experian Credit Reporting Policy.....	23

Disclaimer

This report is intended solely for the information of the Office of the Australian Information Commissioner. Neither Keypoint Law nor Experian Australia Credit Services Pty Ltd accept any responsibility to any other person to whom this report may be shown or into whose hands it may come.

The facts asserted in this report and on which we base our findings are derived wholly from the documents identified in Attachment 1 and the responses provided in interviews and meetings with the persons identified in Attachment 2.

This report concerns compliance only with Part IIIA of the *Privacy Act 1988* and the *Privacy (Credit Reporting) Code 2014*. We have not examined and offer no opinion about any other obligations under the Privacy Act that may or may not be applicable to Experian Australia Credit Services Pty Ltd.

Terms used in this report that are defined in the Glossary have the meaning given in the Glossary.

This report is dated as at 16 June 2017.

Glossary

Term	Definition
Bureau Member	A client of Experian who supplies credit information to Experian or to whom Experian discloses credit reporting information (or both).
Client Bureau Member	A Bureau Member to whom Experian discloses credit reporting information.
CR Code	The <i>Privacy (Credit Reporting) Code 2014</i> , as in force at the date of this report.
Credit reporting policy or CRP	The document described as the Experian Australia Credit Services Privacy Policy, prepared pursuant to section 20B of the Privacy Act and published on Experian's website, as set out in Attachment 3.
Data Supplier Bureau Member	A Bureau Member who supplies credit information to Experian.
Data Management Policy	The policy described as such by Experian, which governs data handling and access to systems as at the date of this report.
Date of this report	16 June 2017.
Experian	Experian Australia Credit Services Pty Ltd (ACN 150 305 838)
Live credit bureau environment	The NextGen information system in which credit reporting information about individuals is kept for the purpose of disclosure to Client Bureau Members.
Part IIIA obligations	See section 2.2 of the Executive Summary of this report.
Permitted CRB disclosure	As defined in section 20F of the Privacy Act.
Privacy Act	The <i>Privacy Act 1988</i> (Cth), as in force at the date of this report.
Privacy Regulation	The <i>Privacy Regulation 2013</i> (Cth), as in force at the date of this report.
Report	This "Experian Australia Credit Services Pty Ltd Report detailing the findings of a review conducted pursuant to clause 24.2 of the <i>Privacy (Credit Reporting) Code 2014</i> ", dated 16 June 2017
Transition Lab	An offline testing environment operated by Experian as at the date of this report, in which data is de-identified and analysed to ensure that Data Supplier Bureau Members are supplying valid, accurate and reliable credit information to Experian, before they are allowed to load a particular data type into the live credit bureau environment.

Executive Summary

Overall report rating

Compliant with Part IIIA of the Privacy Act and the CR Code

1. Introduction

- 1.1. Experian Australia Credit Services Pty Ltd, (**Experian**) is part of a group of companies whose ultimate holding company is Experian Plc, a company incorporated in the United Kingdom and listed on the London Stock Exchange. Experian Plc is a global company providing data, analytics, marketing and credit services and related software to organisations and consumers to help them manage the risk and reward in making every day commercial and financial decisions.
- 1.2. Experian is a credit reporting body under the Privacy Act and accordingly collects, uses and discloses personal information in the conduct of its credit reporting business. As a result, the information that Experian Credit Services collects, uses and discloses is regulated under Part IIIA of the Privacy Act and the CR Code. This report considers those obligations and not the Australian Privacy Principles.

2. Background and report objectives

- 2.1. This report contains the findings of our independent review of Experian's operations and processes pursuant to clause 24.2 of the CR Code.
- 2.2. The objective of this review is to express an opinion with regards to Experian's compliance with the credit reporting obligations in Part IIIA of the Privacy Act, the Privacy Regulation and the CR Code. This review does not cover Experian's compliance with the Australian Privacy Principles or any other obligations under the Privacy Act and we offer no opinion in respect of such matters.
- 2.3. Our review involved performing procedures to obtain evidence about Experian's compliance with its obligations under Part IIIA of the Privacy Act and the CR Code (collectively, **Part IIIA obligations**). Procedures performed include:
 - reviewing policy and process documents
 - interviews with key Experian personnel
 - reviewing samples of credit reporting information held by Experian, and
 - reviewing regulatory logs maintained by Experian.
- 2.4. Where necessary or appropriate, our review involved reviewing samples of documents created by Experian on the applicable topic. We believe that the evidence we have obtained is sufficient and appropriate evidence to obtain reasonable assurance whether Experian complies with its Part IIIA obligations.

- 2.5. In particular, our review involved the following procedures to assess Experian's compliance with the CR laws:
 - (a) desk reviews of documents (policies and processes, standard forms and agreements)
 - (b) interviews of selected Experian personnel (both targeted and randomly selected)
 - (c) analysis of regulatory breach logs, as relevant, and
 - (d) analysis of a sample of default listings provided.
- 2.6. We examined Experian's operations and processes (as disclosed in the documents we examined and interviews we conducted with key Experian personnel) and assessed them against checklists of obligations under Part IIIA of the Privacy Act and related obligations under the CR Code.
- 2.7. All documents we examined were supplied to us by Experian for our review at Experian premises under supervision by Experian personnel. We have not retained copies of the documents we reviewed.

3. Conclusion

- 3.1. On the evidence that we reviewed and for the reasons that follow, and subject to our qualifications in this report, our audit confirms that Experian complies with its Part IIIA obligations.

Keypoint Law

16 June 2017

Detailed observations

1. Policy about the management of credit reporting information

- 1.1.1. Section 20B(3) of the Privacy Act requires Experian to have a clearly expressed and up-to-date policy about how it manages credit reporting information (credit reporting policy). Experian has its own Credit Reporting Policy (**CRP**) addressing the following matters:
- the kinds of credit information held by Experian and how it is collected
 - how Experian holds credit reporting information
 - the kinds of information that Experian derives from credit information that it holds
 - the purposes for which Experian collects, holds and uses credit reporting information
 - that individuals can request that Experian not use their credit reporting information for pre-screening direct marketing
 - how individuals who reasonably believe that they are (or are likely to be) a victim of fraud can request a ban period be applied to their credit reporting information
 - how individuals can access credit reporting information that Experian holds about them
 - the measures that Experian takes to ensure that credit reporting information held about individuals is accurate and up-to-date
 - how individuals may request correction of their credit reporting information
 - how individuals may make complaints to Experian,
 - contact details for the Privacy Commissioner and Credit and Investments Ombudsman if an individual is dissatisfied with Experian's handling of a complaint and wishes to escalate the matter further, and
 - methods of contacting Experian.
- 1.1.2. Experian's CRP contains all information required by section 20B(4) of the Privacy Act.
- 1.1.3. Section 20B(5) of the Privacy Act requires Experian to take such steps as are reasonable in the circumstances to make its CRP available free of charge and in such form as appropriate. Clause 3.1 of the CR Code requires Experian to publish its CRP on its website. Experian complies with this requirement, as its CRP is freely available to the general public as a PDF document on its website.

2. Collection of credit information

- 2.1.1. In the course of our audit, we are instructed by Experian that Experian collects credit information from the following sources:
- Data Supplier Bureau Members
 - State and Territory courts
 - Australian Financial Security Authority (**AFSA**)
 - Australian Securities and Investments Commission (**ASIC**), and
 - Australian Postal Corporation.
- 2.1.2. Data Supplier Bureau Members are entities with whom Experian has a contractual arrangement to receive credit information. Experian carries out due diligence investigations in relation to any entity that wishes to become a Bureau Member, part of which involves verifying that:
- (a) the entity is in fact a credit provider as defined in sections 6G-6K of the Privacy Act
 - (b) that it has an Australian link (verified by Australian Company Number and/or Australian Business Number searches), and
 - (c) that it is a member of a recognised external dispute resolution scheme – either the Financial Ombudsman Service or the Credit and Investment Ombudsman.
- 2.1.3. Experian's due diligence procedures also require it to verify that a prospective Bureau Member is appropriately licensed or authorised to engage in credit activities, or is exempt from the requirement to hold an Australian credit licence (**ACL**). This requirement is applied indiscriminately to all prospective Bureau Members, regardless of the type of data they will be supplying to Experian. This exceeds what is required by section 21D of the Privacy Act. As an additional safeguard, Experian also refuse to accept as a Bureau Member any entity that operates out of a private residential address.
- 2.1.4. Experian's data validation rules are programmed to reject information for which the borrower's date of birth is less than 18 years prior to the relevant date for the record (e.g. start date for consumer credit liability information, payment date for repayment history information). This ensures that credit reporting information Experian collects does not relate to acts, omissions, matters or things occurring or existing before the individual turned 18 years of age and achieving compliance with clause 5.4(a) of the CR Code.
- 2.1.5. In its agreements with Bureau Members, Experian requires Bureau Members to comply with all applicable laws, including the Privacy Act and CR Code, meaning that Bureau Members may only supply credit information to Experian if they are themselves permitted to do so under s 21D of the Privacy Act.
- 2.1.6. Experian further reviews the privacy policies of prospective Bureau Members to ensure that they provide the relevant information and contact details for internal and external dispute resolution and the Office of the Australian Information Commissioner.

- 2.1.7. Experian therefore complies with the obligation in section 20C(3) of the Privacy Act to collect credit information only from credit providers who are themselves authorised under section 21D to provide credit information to Experian.
- 2.1.8. Our review did not yield any evidence of Experian receiving any unsolicited credit information. Credit information is supplied to Experian via a secure file transfer protocol in files created in accordance with the Australian Credit Reporting Data Standard published by the Australian Retail Credit Association. The ability to supply credit information to Experian therefore requires the active involvement of Experian in granting access to its credit reporting environment, creating no opportunity for unsolicited data supplies.
- 2.1.9. Experian's Data Management Policy correctly implements the section 20C prohibition on collecting identification information without also collecting or already holding credit information of another kind about the individual. We found no evidence of non-compliance with the Data Management Policy.

3. Use and disclosure of credit reporting information

3.1. Use of credit reporting information

- 3.1.1. Experian uses credit reporting information for the purposes of:
- compiling credit reports in respect of individuals
 - computing credit scores in respect of individuals, and
 - carrying out procedures to test system integrity.
- 3.1.2. These activities are clearly within the scope of its credit reporting business and therefore permitted under section 20E(2)(a) of the Privacy Act.

3.2. Disclosure of credit reporting information

- 3.2.1. Experian discloses credit reporting information to Client Bureau Members (some of whom may also be 'Data Supplier' Bureau Members). Client Bureau Members are subject to the same onboarding process as Data Supplier Bureau Members, part of which involves verifying that they are a credit provider as defined in the Privacy Act and that they have an Australian link.
- 3.2.2. When requesting credit reporting information from Experian, a Bureau Member must specify the reason for which they are requesting the information (by way of system codes that correspond to permitted CRB disclosures in s 20F of the Privacy Act) and other particulars such as the type of credit applied for, account type and amount. Experian's Master Services Agreements with Bureau Members also oblige Bureau Members to use credit reporting information supplied by Experian only in ways permitted by law.
- 3.2.3. All activities on Experian's information systems, including requests for and disclosures of information, are electronically footprinted and those footprints are saved permanently for future reference. Since the footprint information is readily retrievable (by appropriately authorised Experian personnel) in future if the need arises, the Electronic Transactions Act 1999 (Cth) operates to qualify it as a written note of the disclosure for the purposes of section 20E(5) of the Privacy Act.

- 3.2.4. If requests for information are made by law enforcement bodies, Experian's policies provide that the Head of Legal, Experian Australia Credit Services; Head of Compliance (Australia and New Zealand), who is legally qualified; and the Head of Client Services and Consumer Operations must be consulted in deciding whether or not to agree to the information request. The involvement of senior managers allows for a more thorough assessment of the information request and increases the quality of the satisfaction that Experian will form before disclosing information to a law enforcement body.
- 3.2.5. Both Experian's policies and personnel interviewed do not address the disclosure of credit reporting information to other credit reporting bodies outside the facilitation of client credit provider-other CRB data corrections through the bureau's Corrections Exchange product.
- 3.2.6. Until 5 June 2017, Experian did not hold repayment history information (**RHI**) in its live credit bureau environment. It does hold masked RHI from credit providers that are ready for release into the live bureau when the relevant credit providers provide that instruction. Repayment history information is also loaded by selected Bureau Members into Experian's Transition Lab testing environment. This is to allow for analysis in accordance with purposes permitted under the Privacy Act including for examining the integrity of the RHI data loaded (e.g. whether it is internally consistent) and to ascertain whether Bureau Members are correctly reporting RHI. Experian then undertakes follow-up of any issues with the applicable Bureau Member.
- 3.2.7. On 5 June 2017, one Bureau Member loaded 680 repayment history information records into Experian's live credit bureau environment and, under the reciprocity rules of Bureau Membership, those RHI records are only available to influence the CRB derived information provided to one other Bureau Member. That Bureau Member holds an ACL. As Experian's due diligence process for new Bureau Members requires it to verify that the prospective Bureau Member holds an ACL or is otherwise relevantly authorised, there is no risk of disclosure of repayment history information in breach of section 20E(4) of the Privacy Act.
- 3.2.8. Interviews with relevant Experian personnel indicated that Experian's policies and procedures in relation to the use and disclosure of credit reporting information were being complied with, and our review of the procedures did not find any evidence to suggest otherwise. The policies and procedures we reviewed were compliant with the Privacy Act. We therefore consider that in using and disclosing credit reporting information, Experian complies with its obligations under section 20E of the Privacy Act.

3.3. Direct marketing and pre-screening

- 3.3.1. Experian's credit reporting policy states that Experian may use credit reporting information that it holds to pre-screen individuals' eligibility to receive direct marketing communications from credit providers unless the individual has requested that they not do so.
- 3.3.2. However, Experian's internal policy documents are silent on the issue of pre-screening for direct marketing. Experian personnel indicated in interviews that Experian does not currently use credit reporting information for direct marketing or to pre-screen individuals' eligibility for direct marketing purposes.

Therefore, no issues arise in relation to sections 20G or 20H of the Privacy Act or under clause 18 of the CR Code.

3.4. Ban periods

- 3.4.1. Experian enables consumers to request a ban period by ordering a copy of their credit report and including a ban period request with their order. Experian does, however, require ban period requests to be made in writing and to explicitly state that the individual is requesting a ban period. Experian's intention with this requirement is to ensure that the consumer is aware that they are requesting a ban period.
- 3.4.2. A ban period is noted on the individual's credit report. Experian's data validation rules automatically apply a default ban period of 21 days. The ban period is confirmed with the consumer by providing the consumer with a copy of their credit report, which now includes a notation reflecting the ban period. Experian facilitates the extension of ban periods in consultation with the relevant individual as the Privacy Act provides.
- 3.4.3. Our review procedures found no evidence that Experian uses or discloses, whether deliberately or inadvertently, information that is the subject of a ban period request. Per clause 17.3 of the CR Code, Experian writes to an individual at least 5 days before the expiry of the ban period to remind them of their ability to extend the ban beyond its scheduled finish. Experian does not limit the number of times that an individual can have their ban period extended.
- 3.4.4. Experian does not charge individuals for requesting a ban period or extending their ban period.

3.5. Government related identifiers

- 3.5.1. Experian does not use government issued identifiers as its own identifier of an individual. Experian generates its own unique identifier for each individual credit report.

3.6. De-identified credit reporting information

- 3.6.1. Experian holds de-identified credit reporting information in its Transition Lab testing environment. It does not hold any de-identified credit reporting information in its live credit bureau environment. The de-identified information is used by Experian for testing its credit reporting system and by those entities who supplied the particular data for analytical purposes to test comprehensive credit reporting procedures before they decide to embrace positive credit reporting.

4. Quality of credit reporting information

Data quality is essential to Experian's value proposition and it therefore takes numerous measures to ensure that credit information it collects is accurate, up-to-date and complete and that credit reporting information it uses or discloses is accurate, up-to-date, complete and relevant.

4.1. Collection

- 4.1.1. Experian relies on Data Supplier Bureau Members (and suppliers of public records such as AFSA and courts) to supply accurate, up-to-date data. Incoming data is assessed against Experian's data validation rules. It is rejected if it is logically inconsistent or if Experian is prevented by the Privacy Act from collecting it (e.g. default information relating to defaults that occurred over five years ago). Experian's file handling process also compares each data load against past data loads by the same Bureau Member, both in respect of the data itself and in respect of characteristics of the data (e.g. number of records submitted, frequency of file submission by a Bureau Member), and variances in excess of 5% are investigated. Rejection rates in excess of 5% of records in a particular data load are also investigated. Interviews with Experian personnel disclosed that usually occurs where a Bureau Member supplies data with an essential field missing (e.g. account type not specified) or incorrectly completed (e.g. driver's licence field is populated as "valid" rather than with each individual's driver's licence number).
- 4.1.2. Experian personnel indicated that despite Experian's policy being a 5% threshold for investigating rejections and variances, lesser variances or rejection rates are investigated by Experian if, based on the understanding of the Bureau Member obtained from dealings with the Bureau Member, those lesser variances are considered to be matters of concern.
- 4.1.3. Whilst an issue with a data load is being investigated, the entire data load is not loaded onto Experian's live credit bureau environment until the issue is resolved.
- 4.1.4. If investigations uncover a systemic issue with a Bureau Member's reporting process, Experian works with the Bureau Member to address the issue. Absolute zero variances are also investigated to ensure that they are not the result of the Bureau Member mistakenly submitting a past file instead of a new, current file.

4.2. Audits of Bureau Members

- 4.2.1. Data sharing agreements that we reviewed all contained terms requiring the credit provider to supply accurate data and to promptly update, correct and/or supplement all information provided to Experian. Data sharing agreements with credit providers also oblige credit providers to promptly verify the accuracy of data provided to Experian where its accuracy is questioned by the consumer. Data suppliers are audited on a 3 to 5 year timeline and on an ad-hoc basis if issues are identified (e.g. unusually high volume of correction requests in relation to data that they supplied). The audit process and questionnaire were developed by the Head of Legal and the General Manager, Credit Services, and Experian personnel inform us that the audit questionnaire has been reviewed by the Office of the Australian Information Commissioner.

- 4.2.2. In the three years to the date of this report, Experian completed audits of three credit providers. Audits of two of the credit providers resulted in no adverse findings. For the third credit provider, the only issue identified was that some areas within the credit provider did not have visibility of the data which was being contributed to Experian, and this issue was remediated as part of the audit process.
- 4.2.3. As at the date of the review, Experian is in the process of auditing three additional credit providers and has an audit of one other credit provider scheduled to commence within the next 12 months.
- 4.2.4. Experian's data supply agreements with Data Supplier Bureau Members impose an obligation on the Bureau Member to ensure that the data it supplies to Experian is accurate and complete, meaning that Experian also has contractual remedies available to it in circumstances where Bureau Members supply it with inaccurate data. Experian advises that no such breaches of data supply agreements have occurred to date. Rather, only minor issues have been discovered and all have been appropriately and promptly resolved after consultation with Experian to address the causes of the issues.

4.3. Use or disclosure

- 4.3.1. Experian has processes for rectifying data that is not accurate, up-to-date, complete and relevant. If either Experian or a data supplier becomes aware that information in Experian's credit bureau environment is defective in some way, the 'back out' process is initiated. This involves, first, suppressing the information from all bureau channels, thereby preventing access to it, and then physically removing the data from the bureau environment. Together with the obligations for data suppliers to promptly update or correct information, this ensures that Experian does not inadvertently use or disclose credit reporting information that it knows is not accurate, up-to-date, complete or relevant.

5. Access to credit reporting information

- 5.1.1. Section 20R(1) of the Privacy Act requires Experian to, on request by an individual, provide the individual with access to credit reporting information that it holds about them. Experian has a process by which individuals can order a copy of their 'credit report' – a record of all credit reporting information that Experian holds about them. As with all consumer facing aspects of Experian, a consumer can obtain a copy of their credit report free of charge.
- 5.1.2. A request by the individual for access to their credit report can be made to Experian by email or post. Consistently with the obligation in clause 19.1 of the CR Code to satisfy itself as to the identity of the person requesting access to credit reporting information, Experian requires individuals to include the following identification information in any request for a credit report:

- (a) 1 government-issued photo identification document (e.g. driver licence, passport), 1 government service card (e.g. Medicare or Centrelink card), student ID card or credit card and 1 bank, insurance, utility or council rates notice showing the individual's current residential address, or
 - (b) 1 government-issued photo identification document and 3 bank, insurance, utility or council rates notices showing current residential address.
- 5.1.3. From these identification documents, Experian verifies the full name, date of birth, current address and, if available, driver licence number of the individual requesting access. If an individual fails this identification process, the Experian employee handling the access request must request further information from the consumer. Experian's "Consumer Operations – Operations Manual" requires the customer identification procedure to be applied without exception to credit report orders.
- 5.1.4. The "KYC Process" appendix to Experian's Consumer Operations – Operations Manual provides that access requests are not to be granted over the phone. Instead, Experian personnel are to direct the individual to make a request by email or post. In our opinion, this procedure enables Experian to be reasonably satisfied that the person requesting the credit report is the individual who is the subject of that credit report. The documents requested by Experian are readily available to individuals and the information requirement therefore should not deter or prevent anyone from obtaining their credit report from Experian.
- 5.1.5. Once a credit report order is approved, the report is provided to the individual in the same manner as they made the request – post for postal requests and email (secured PDF file) for email requests. We found no evidence indicating that access requests have not been responded to within the 10 day timeframe required by section 20R(3) of the Privacy Act.

6. Corrections

6.1. Corrections when Experian is made aware of the inaccuracy

- 6.1.1. Section 20S(1) of the Privacy Act provides that if a credit reporting body holds credit reporting information about an individual and is satisfied that, having regard to the purpose for which the information is held, the information is inaccurate, out-of-date, irrelevant or misleading, it must take such steps as are reasonable in the circumstances to correct the information to ensure that it is accurate, up-to-date, complete, relevant and not misleading.
- 6.1.2. As the success of Experian's credit reporting business depends on the accuracy of the data that it holds, uses and discloses, Experian investigates and acts on any suggestion that data which it holds may be incorrect, correcting data or facilitating the correction of data as soon as possible.
- 6.1.3. Experian's Consumer Operations – Operations Manual includes a procedure for Bureau Members to request correction of information that they previously supplied to Experian. It provides that if a Bureau Member requests correction of information that they previously supplied to Experian, the Client Services Agent (i.e. Experian employee) who is handling the request must first identify

the customer using the know-your-customer procedures stipulated in the “Appendix 4 ACB KYC Process” document. Once the person purporting to act for the Bureau Member is identified and verified, the Client Services Agent accesses the credit report of the individual to which the correction request relates, makes the correction and makes a note of the correction on the individual’s credit report. This process results in information being corrected as soon as Experian becomes aware of its incorrectness and so is reasonable and compliant with section 20S(1) of the Privacy Act.

- 6.1.4. After a correction requested by a Bureau Member has been made, the Consumer Operations – Operations Manual provides for any credit provider to whom the information has been provided in the last three months to be notified of the correction within 7 days of the correction occurring. This is consistent with Experian’s obligations under section 20S(2) of the Privacy Act and clause 20.9 of the CR Code.

6.2. Corrections requested by individuals

- 6.2.1. Section 20T of the Privacy Act provides individuals with a right to request that a credit reporting body correct credit information, CRB-derived information or CP derived information. Experian does not collect CP derived information from Bureau Members.
- 6.2.2. Experian’s Consumer Operations – Operations Manual includes a procedure for individuals to request a correction to their credit report. Having a copy of their credit report is a prerequisite for an individual to request a correction to information on their credit report. If an individual does not have a copy of their credit report, they are directed to obtain a copy of it (free of charge) via the procedure outlined in 5 above and to then request a correction to it.
- 6.2.3. Individuals can submit correction requests by email, post or fax. In each case, the individual is required to include in the communication their credit report number, a full description of the requested change, copies of identity documents to verify the individual’s identity in accordance with the procedure described in 5.1.2 above and, if available, proof of the correctness of the requested change.
- 6.2.4. Once Experian receives all information from the individual, a Client Services Agent inputs the details of the correction request into Corrections Exchange, Experian’s platform for managing correction requests. Experian advises the individual of their Corrections Exchange case number and that they will provide an update on the status of the request within 30 days.
- 6.2.5. Experian then investigates the request and, in doing so, consults with the Bureau Member who supplied the information that is the subject of the corrections request. Experian also suggests to the individual that they separately raise the issue with the Bureau Member in order to prompt a faster response from the Bureau Member.
- 6.2.6. In accordance with section 20T(2)(a) of the Privacy Act, Experian’s policy provides for correction requests to be resolved within 30 days after they are made. If a request reaches 20 days after it is made without any response from the Bureau Member who supplied the information and it appears that it will not be resolved within 30 days, Experian requests from the individual, in writing, an extension of the time period for dealing with the correction request.

For the year ended 30 June 2016, the average time taken to finalise a correction request was 6.4 calendar days, well within the 30 day limit set by the Privacy Act.

- 6.2.7. Once Experian determines whether or not to make the requested correction, its policy is to notify the individual within 5 days of making the decision and to notify Bureau Members to whom it has disclosed the information which is the subject of the correction request (including CRB derived information generated from that information) in the previous 3 months within 7 days of making the decision. This practice complies with clauses 20.7 and 20.9 of the CR Code respectively.
- 6.2.8. If the information is corrected, Experian notifies the individual of the correction by sending them a copy of their credit report, updated to reflect the correction. If Experian decides not to correct the information because it is not satisfied that it is inaccurate, misleading, out-of-date or irrelevant, the investigating officer writes to the individual advising them of this fact and providing evidence as to why it believes that the information it holds is correct. This communication from Experian to the individual also informs the individual that they may complain about the outcome to the Credit and Investments Ombudsman or to the Privacy Commissioner. This is compliant with section 20U of the Privacy Act.
- 6.2.9. In its “Credit Reporting Privacy Code Annual Report” for the year ended 30 June 2016, prepared pursuant to clause 23.11 of the CR Code, Experian states that 52% of correction requests during the year resulted in a successful correction. Whilst this is more than half of all correction requests, it means that a substantial proportion of requests are being denied. Experian personnel advised in interviews that the reason for this is that many correction requests evidence a misunderstanding of the credit reporting process and the different types of default information in the Privacy Act – many are requests to remove default information from the individual’s credit report after the amount in default has subsequently been paid, with the individual not knowing that subsequent payment does not entitle them to immediate removal of the default listing but rather to have payment information in respect of that amount recorded on their credit file (see section 21E of the Privacy Act).
- 6.2.10. As for all of its consumer facing activities, Experian does not charge individuals to request a correction to their credit report. This complies with section 20T(5) of the Privacy Act.
- 6.2.11. Interviews with Experian personnel yielded answers consistent with the policy set out in the Consumer Operations – Operations Manual, indicating that Experian effectively trains its staff in its procedures to comply with the applicable Part IIIA obligations expressed in that manual and that the personnel we interviewed are following those policies.

7. Security

7.1. Security of credit reporting information held by Experian

- 7.1.1. Section 20Q(1) of the Privacy Act requires a credit reporting body to take reasonable steps to protect credit eligibility information from:
- (a) misuse, interference and loss, and

- (b) unauthorised access, modification and disclosure.
- 7.1.2. Experian takes a number of measures to prevent such things from happening to credit reporting information that it holds, which we consider in totality to be more than reasonable.
- 7.1.3. Experian's live credit bureau environment is quarantined from Experian's other information systems and protected by firewalls and other hardware and software measures from unauthorised access. The technical measures are to the industry best practice standard and attempted intrusions into the system are continually monitored. This protects the credit reporting information held electronically by Experian from external threats.
- 7.1.4. Credit reporting information received or held in hard-copy form does not leave a secure mail and printing room. The only exception is when credit reports are posted to the individuals whom they are about in response to an access or correction request by that applicable individual. Incoming mail does not leave the secure mail room; rather, it is scanned to the dedicated file server and sent to the relevant person by secure internal email, and then destroyed by being securely shredded.
- 7.1.5. Within the organisation, the Experian credit bureau is physically separated from other Experian group activities by being located in the Heightened Security Area – a physical room to which access is highly restricted. Access to the Heightened Security Area is limited to those staff with a direct need to enter it to perform their role, and to supervisory staff. Visitor access can only be approved by the appointed High Security Area Manager, and all visitors must be accompanied by an Experian employee in the Heightened Security Area at all times.
- 7.1.6. Within the Heightened Security Area, there is a Client and Consumer Services area to which access is further restricted. It is in this Client and Consumer Services area that Experian personnel can access individuals' credit reports. In this area, computers are modified to disable ports for external storage media (e.g. USB ports and disk drives), printing must be sent only to a secure printer located within the Client and Consumer Services area, and internet and email access is limited to the minimum necessary to enable personnel to perform their roles.
- 7.1.7. These measures ensure that the possibility of unauthorised access, modification or disclosure by persons within the Experian organisation is minimised.

7.2. Security of credit reporting information disclosed to Bureau

Members

- 7.2.1. Section 20Q(2) of the Privacy Act requires a credit reporting body to enter into agreements with credit providers, requiring them to protect credit reporting information disclosed to them from misuse, interference and loss, and unauthorised access, modification or disclosure.
- 7.2.2. Experian's Master Services Agreement with each Client Bureau Member imposes an obligation on the Client Bureau Member to keep information, including credit reporting information, disclosed by Experian to the Client

Bureau Member strictly confidential. The Master Services Agreement also forbids the disclosure of such by the Client Bureau Member to any person except to the extent necessary for the performance of obligations under the agreement. It also requires the Client Bureau Member to take all reasonable steps to prevent unauthorised access to information supplied by Experian, including to, at a minimum, comply with any information security requirements advised or directed by Experian from time to time.

- 7.2.3. Experian's Master Services Agreement with each Client Bureau Member provides each party with a right to, on reasonable notice, audit the other party's compliance with the agreement. Whilst it is set out as a two-way right, it is relied on by Experian to conduct the audits described in 4.2 above. Audits are conducted by senior Experian personnel who have the functional independence required by clause 23.3(b) of the CR Code.

8. Complaints

- 8.1.1. Section 23A(1) of the Privacy Act provides individuals with a right to complain to a credit reporting body about an act or practice that may be a breach of a provision of Part IIIA of the Privacy Act or the CR Code. Experian enables individuals to make complaints, but defines complaints much more broadly to include any expression of dissatisfaction with Experian's handling of an issue (excluding commercial negotiation conflicts), whether or not it relates to an alleged breach of Part IIIA of the Privacy Act or the CR Code.
- 8.1.2. Experian's policy provides for written notice to be provided to the complainant within 7 days of receipt of the complaint:
- (a) acknowledging receipt of the complaint, and
 - (b) setting out how the complaint will be dealt with and advising that it is in the process of being resolved.
- 8.1.3. All communications to the complainant refer to the ability to complain to the Credit and Investments Ombudsman, of which Experian is a member or the Privacy Commissioner.
- 8.1.4. Experian investigates complaints in a timely manner, aiming to resolve complaints within 21 days after they are made. In the year ending 30 June 2016, the average time taken to resolve complaints was 18.75 days. This is within the 30 day time limit set out in section 23C(5) of the Privacy Act, although the Privacy Act provides for extension of the period with the written agreement of the complainant if a complaint cannot be resolved within 30 days.
- 8.1.5. Once a complaint is investigated, Experian notifies the complainant of its decision in writing, and of the fact that if the complainant is dissatisfied with Experian's decision then they can complain to the Credit and Investments Ombudsman or to the Privacy Commissioner.
- 8.1.6. Experian's policies regarding complaints provide for consultation of credit providers and other credit reporting bodies when investigating a complaint. However, as complaints relate to Experian's conduct rather than the quality of the information held by Experian, there would very rarely be a need to consult with a credit provider or credit reporting body when investigating a complaint.

- 8.1.7. In the past 12 months, Experian has received only two complaints (according to its broad definition of 'complaint'), both of which involved individuals who were aggrieved with the need to send copies of identification documents to Experian in order to be able to obtain a copy of their credit report. Neither complaint alleged a breach of Experian's Part IIIA obligations and so are outside the scope of sections 23A and 23B of the Privacy Act. Note that the CR Code requires Experian to obtain such evidence as is reasonable in the circumstances to satisfy itself as to the identity of the person requesting access to credit reporting information.
- 8.1.8. Experian does not charge individuals any fee to make a complaint.

9. Information retention and destruction

- 9.1.1. Sections 20W and 20X of the Privacy Act set out the retention periods for different kinds of credit information. Section 20V of the Privacy Act requires a credit reporting body to destroy or de-identify credit information (and any CRB derived information derived from that credit information) within one month after its retention period ends.
- 9.1.2. Experian's credit reporting system purges data on a fortnightly basis. It is programmed to automatically destroy credit information during the next purge after the end of the retention period for that item of credit information. We have examined Experian's data validation rules and can confirm that the rules for automatic deletion of data correspond to the retention periods stipulated in sections 20W and 20X of the Privacy Act. However, they contain exceptions for circumstances where Experian is required by law to retain credit information beyond its retention period. This is:
- (a) where it is subject to a pending correction request
 - (b) where it is the subject of a dispute, and
 - (c) where it is otherwise required to be retained by an Australian law or an order of a court or tribunal.
- 9.1.3. As data purges are conducted on a fortnightly basis, there is no prospect of data being retained beyond one month after the end of the retention period unless section 20V(3), (4), (6) or (7) of the Privacy Act applies.
- 9.1.4. When credit information or CRB derived information is retained beyond one month after the expiry of its retention period, it is Experian's policy to notify the Privacy Commissioner in accordance with section 20Z(2) of the Privacy Act, and to not use or disclose the information except for limited purposes under section 20Z(4). To date, no incident has occurred where Experian has been required to retain information beyond its stipulated retention period.
- 9.1.5. Experian's policy and processes in respect of the response to and treatment of credit reporting information reported to it which relates to credit provided as a result of a fraud committed against an individual are fully consistent with the provisions of section 20Y of the Privacy Act.

10. Qualifications and assumptions

- 10.1.1. The facts asserted in this report and on which we base our findings are derived wholly from the documents identified in Attachment 1 and the responses provided in interviews and meetings with the persons identified in Attachment 2.
- 10.1.2. This report concerns compliance only with Experian's Part IIIA obligations. We have not examined and offer no opinion about any other obligations under the Privacy Act or other laws that may or may not be applicable to Experian. In particular, we did not consider compliance with the Australian Privacy Principles to the extent that they overlap with Part IIIA obligations.
- 10.1.3. Our report is designed to provide reasonable assurance that Experian complies with its Part IIIA obligations. In carrying out our review, we observed samples of documents and processes, rather than the entire population, where we considered it more appropriate and practical to do so.
- 10.1.4. All facts asserted in this report are based on instructions supplied by Experian.
- 10.1.5. The review procedures identified in this report were carried out between 8 May 2017 and 16 June 2017.
- 10.1.6. To the extent that there was an overlap between the Australian Privacy Principles and Part IIIA obligations, the application of the Australian Privacy Principles was outside the scope of this report and therefore not considered (for example, the incidental collection of personal information that is not credit information from individuals requesting access to their credit report).

Keypoint Law

16 June 2017

Attachment 1

Documents examined by Keypoint Law in compiling this report

No.	Title	Description
1	CCP Monthly processing	Process diagram – how credit providers update information they have provided to Experian on a monthly basis.
2	Current DM network data flow	Process diagram – data flow process within information system.
3	Custom data trials process	Process diagram – where customers request Experian to perform unique data trials for them.
4	Customer onboarding data management	Table/matrix – taking on a new customer (data supplier or CR information user).
5	Data team process overview v1	Process diagram – file handling process (general).
6	Data variance process	Process diagram – dealing with variances in data (both individual credit files and data about credit files).
7	Data load process	Process diagram – how data enters Experian's information system.
8	Data quality issues	Process diagram – resolving data quality issues.
9	Default load process	Process diagram – inputting default information into system.
10	Default update process	Process diagram – updating default information on individual credit files.
11	Data quality fix flowchart	Process diagram – resolving data quality issues.
12	HSA access	Process diagram – internal access to data/systems.
13	Identity handling	Process diagram – updating individual aliases on individual credit files.
14	Onboarding process	Process diagram – for setting up a new Bureau Member on Experian's systems.
15	Client services operations manual v 0.6	Policy – overarching policy document for Client Services division (i.e. division that deals with data suppliers and information customers).
16	Appendix 2 ACB Due Diligence screening	Policy – procedures that must be followed when taking on a new data supplier or client.
17	Appendix 3 ACB Member Account management	Policy – dealing with Bureau Members.
18	Appendix 4 ACB KYC Process	Policy – identification procedure to be undertaken before granting an access request.
19	Online credit reporting process	Procedure – instructions how to process an access request received by email.
20	Correction policy	Policy – data correction policy.
21	ARCA Credit Data Reporting requirements	ARCA standard for reporting by credit providers to CRBs. Not Experian document.
22	CCR default information factsheet	Factsheet – about various obligations and definitions under Pt IIIA
23	Business back out	Process – for removing data from Experian's credit reporting environment.
24	Customer response files procedure	Process diagram – for dealing with data issues raised by customers.
25	Data sharing agreements	10 data sharing agreements between Experian and data suppliers.

No.	Title	Description
26	Complaints handling policy	Policy – for handling complaints from consumers and bureau members.
27	Data management policy	Policy – concerning data handling and access to systems.
28	Consumer operations – operations manual	Policy – covering all aspects of dealing with consumers.
29	Regulatory breach log	Log – of regulatory breaches (zero entries).
30	Complaints register	Log – complaints received by Experian.
31	Default listings log – sample	Log – sample of 100 default listings.
32	CR Code annual report 2015-16	Report – as required under the CR Code.
33	Credit reporting privacy policy	Policy – credit reporting policy pursuant to Privacy Act s 20B
34	Data validation rules	Policy – data validation rules for credit information received by Experian.
35	Master Services Agreement for Credit Services	Agreement by which Client Bureau Members obtain credit reporting information from Experian.
36	Agreement for the trial provision of Experian Credit Services and Experian Corrections Exchange Services	Agreement for Data Supplier Bureau Members to undertake a three-month trial of receiving credit reporting information from Experian and to make and receive corrections via the Corrections Exchange platform.
37	Audit questionnaire	Questions asked by Experian of credit providers when auditing Bureau Members' compliance with the Privacy Act, CR Code and data sharing agreements with Experian.

Keypoint Law

16 June 2017

Attachment 2

Interviews conducted by Keypoint Law in compiling this report

Date of interview	Name	Position
16 May 2017	Sefike Kirikkaya	Head of Compliance, Australia and New Zealand, Experian Australia Pty Ltd
16 May 2017	Rebecca Barbour	Manager, Bureau Client Relations, Experian Australia Credit Services Pty Ltd
16 May 2017	Frances Russell-Matthews	Head of Legal and Company Secretary, Experian Australia Credit Services Pty Ltd
17 May 2017	Christopher Cooper	Client Services Manager, Experian Australia Credit Services Pty Ltd
17 May 2017	Matthew Allison	General Manager, Credit Services, Experian Australia Credit Services Pty Ltd

Meetings between Keypoint Law and some or all of the abovementioned persons in compiling this report

Date	Person(s)
8 May 2017	Sefike Kirikkaya, Frances Russell-Matthews, Rebecca Barbour, Matthew Allison
9 May 2017	Sefike Kirikkaya
11 May 2017	Sefike Kirikkaya
19 May 2017	Sefike Kirikkaya
13 June 2017	Sefike Kirikkaya, Frances Russell-Matthews, Rebecca Barbour, Matthew Allison, Christopher Cooper
16 June 2017	Sefike Kirikkaya, Frances Russell-Matthews, Rebecca Barbour

Keypoint Law
16 June 2017

Attachment 3

Experian Credit Reporting Policy



Privacy Policy Statement

Our Commitment

While information is the foundation for providing you with superior service, protecting the privacy of your personal information is of the highest importance to us. We believe that responsible stewardship of the information entrusted to us is crucial in developing and maintaining the public trust which in turn is essential for our continued success. We are sensitive to your privacy concerns, and are committed to letting you know what kind of personal information including credit reporting information, information provided to us by credit providers and information used for pre-screening assessments is being collected and how the information is being used.

Experian Australia Credit Services

Experian Australia Credit Services Pty Ltd, ("Experian Credit Services") is part of a group of companies, whose parent company is Experian Plc, which is listed on the London Stock Exchange ("EXPlc"). EXPlc is the global leader in providing, data, analytics, marketing and credit services and related software to organisations and consumers to help them manage the risk and reward in making every day commercial and financial decisions. For more information, please visit the Experian corporate group's website at www.experiangroup.com.

Experian Credit Services is a credit reporting body under the Privacy Act 1988 (Cth) ("Privacy Act"), and does not collect, use or disclose your personal information other than as part of its credit reporting business. As a result, the information Experian Credit Services collects, uses and discloses is regulated under Part IIIA of the Privacy Act 1988 rather than the Australian Privacy Principles. You should be aware that other entities within the Experian corporate group may also collect, use and disclose personal information not related to credit reporting. The Experian Privacy Policy sets out how these entities deal with your personal information. [Experian Privacy Policy](#)

To ensure Experian Credit Services acts in an open and accountable manner, this Privacy Policy provides information as to how we manage your personal information including:

- (a) the kinds of credit information that we collect and how we collect that information;
- (b) the kinds of credit reporting information that we hold, and how we hold that information;
- (c) the kinds of personal information that we usually derive from the information we hold;
- (d) the purposes for which the body collects, holds, uses and discloses credit reporting information;
- (e) how we use your information to contact or market to you directly (and your rights in respect of this);
- (f) how you can access a copy of the credit reporting information we hold;
- (g) how you can seek the correction of such information and your rights to correct; and
- (h) how you can complain if we don't meet our legal obligations and how we deal with such a complaint.

Please take a moment to review this Policy. If you have questions regarding our compliance with the Privacy Act, including the Credit Reporting Privacy Code you may email us or contact us at:

Attn: Privacy Manager
 Experian Australia
 PO Box 1969
 Nth Sydney NSW 2060



This Privacy Policy only covers Experian Australia Credit Services at www.experian.com.au/creditservices.com/credit-services.com.au.

What credit information do we collect and how do we collect it?

As a credit reporting body, Experian Credit Services collects and holds information relevant to your identity and information relevant to how a credit provider has interacted or is interacting with you or has provided or provides credit to you to the extent these things are permitted by law. This information may include:

- details of your financial and credit dealings with companies such as telecommunications providers and utilities;
- details of your dealings with credit providers such as banks and credit card providers;
- details of any court judgments, including bankruptcies;
- details of companies you are involved in (as a shareholder or as a director);
- prior instances of non-payment or collection activities;
- name (and change of name), address (and change of address) and other contact details ;
- queries of your credit information made by credit providers;
- driver's licence details,

We obtain information about you directly from public and private sector parties. We may collect information about you from:

- credit providers with whom you may have a relationship
- mortgage or trade insurers
- debt collection agencies
- state and territory courts
- Australian Financial Security Authority
- Australian Securities Investment Commission,
- Australian Postal Corporation;
- any other parties who are authorised under the Privacy Act to share your personal information

There may be circumstances when we collect additional details from you for the purposes of servicing your request, for example contact details. We would request that if you have a matter with us which is outstanding and your contact details change, that you contact us to provide us with your new information.

Experian Credit Services collects your personal information to enable us:

- to provide our products and services to those parties who are authorised under the Privacy Act to access your credit information;
- to provide you with your credit report and score when you ask us to do so;
- to test the accuracy of the process by which your information is provided to us, updated and loaded into our systems and the credit bureau; and
- to conduct research into the use of bureau product and services.



How do we hold your information?

Once collected, Experian Credit Services holds information in a secure Australian high security data centre. The Experian Credit Services data centre and systems are only accessible by authorised Experian employees who are specially trained in security and data handling policies and protocols to Experian Credit Services business standards and the credit reporting obligations under the Privacy Act.

As a global leader, Experian Credit Services and its affiliated entities recognise and acknowledge the importance of keeping the personal information and data that it holds, secure and protected from unauthorised access. To do this, at a minimum we utilise industry standard security and encryption processes and technology and ensure that access to your personal information is only provided to those employees who need to have access in order to perform their role. Access is also provided to users and subscribers of the products and services we offer and any law enforcement agency with whom we are required by law to provide your personal information.

How does my information become an Experian Credit Report?

Experian Credit Services uses the credit reporting information it holds for you to prepare your Experian Credit Report. The Experian Credit Report may include:

- (a) your Experian Credit Score which is a numerical summary of your credit risk on the basis of the credit reporting information held by Experian Credit Services;
- (b) your identification details including name, (former names) and address (former addresses);
- (c) details of any defaults reported to us;
- (d) comprehensive credit reporting information including details of late or missed payments reported to us;
- (e) court judgment information; and
- (f) the number of queries made on your credit reporting information by credit providers

Our use and disclosure of your personal information

Experian Credit Services may hold, use and/or disclose your personal information only for those purposes which are permissible under the Privacy Act. Generally, credit reporting information is disclosed in the form of an Experian Credit Report and or score in response to a query from a credit provider and where you have given consent to the credit provider seeking a credit report.

Experian Credit Services may also hold, use and disclose information for lawful purposes, including the purposes permitted under the Privacy Act which include:

- where you have provided consent to a party to use or access your credit reporting information generally for the purpose of providing services to you and assessing an application for consumer or commercial credit, mortgage or trade insurance, or where you are looking to provide a personal guarantee
- for your credit provider to assist you with credit related products and services,
- where you have provided consent to a third party to access your information on your behalf,
- for investigative purposes
- where we are required to do so under an Australian law or a court/tribunal order;
- where your personal information is de-identified and used for research and other purposes where permitted by law.

We may also use your personal information to test the accuracy and efficacy of the system and data processes by which it is provided to us including for inclusion in the bureau and in relation to our provision of products and services.



Direct Marketing

Under the Privacy Act there are limited circumstances in which your credit reporting information can be used for the purposes of direct marketing to you and Experian Credit Services will only use or disclose your credit reporting information where permitted by law. Generally we can only permit use or disclosure for direct marketing purposes by or to an Australian credit provider for the purposes of determining whether you may be eligible to receive communications from that credit provider about a particular consumer credit offer ("pre-screening").

You may by written request per the details below, request that we do not use your credit reporting information for the purposes of pre-screening direct marketing. You may need to establish your identity and/or your authority to make the request. Where you have made a request for us not to use your credit reporting information for pre-screening direct marketing, we will make a note on your file and will not use or disclose your credit information for the purposes of pre-screening direct marketing.

What if I am the victim of Fraud?

The Privacy Act provides that where you are a victim of fraud or have reasonable grounds to believe that you are (or are likely to be) a victim of fraud you may request that we do not use or disclose your credit reporting information during for 21 days from when you make the request ("Ban Period"). If we receive a request from a credit provider during the Ban Period, we will notify the credit provider making the request that your credit reporting information is subject to a ban at your request.

To make a ban request you may need to provide us with proof of your identity and details of the fraud or the likely fraud and establish the reasonable grounds you have for requesting the ban.

During the Ban Period you may:

- (a) request us to provide your credit reporting information to a specified credit provider/s; and
- (b) apply to extend the Ban Period.

During the Ban Period to ensure your personal information is not compromised, your information cannot be disclosed or used. The existence of a ban on your file may impact the approval process for an application for credit. Please alert the relevant parties, if you are, or are intending to apply for credit and a Ban Period is under way with us.

Access to your credit reporting information

You are entitled to request access to review the credit reporting information we hold in respect of you. To request access you should send us a request with the following details:

- (a) information required to identify you;
- (b) proof of your identity;
- (c) if you have authorised a person to act on your behalf:
 - (i) identifying the person you have authorised;
 - (ii) a written statement signed by you authorising the identified person to receive the information on your behalf

We may require you to provide further information to reasonably verify your identity and/or to identify your credit reporting information from our systems (including details such as previous names, addresses and identity details).

Once we are reasonably satisfied of your identity or your authorisation, we will notify you of your options for accessing your credit information file.



Requests for credit reports are generally fulfilled within 10 business days of you contacting us.

Experian Credit Services will not charge you a fee to access or a copy of your credit reporting information including where you have not made a request within the last 12 months, or you can provide evidence that in the past 90 days an application for credit has been declined due to your credit history.

Where your request relates to information we may be holding about you that is not reflected in your credit report, we aim to provide you with that information also within 10 business days. Should you require a copy of your credit file, please contact our customer centre by phone, email or post at the details below.

How we maintain the quality of your personal information

It is extremely important to us that the personal information we hold about you is up to date and accurate. We take such steps as are reasonable to ensure that credit reporting information we hold about you is accurate and up to date. To do this we undertake steps to verify information provided to for use as credit reporting information which including:

- (a) giving weighting to the most recent source;
- (b) smart algorithmic matching to identify common typographical errors;
- (c) internal data hygiene review, de-duplication and processing
- (d) use of proven advanced data quality software and systems.

We are required under the Privacy Act to acquire credit reporting information on terms that require providers to ensure that credit information contributed is accurate and up to date and complete. We are also required and do ensure that there are regular independent auditing of those agreements for compliance.

Experian Credit Services ensures that information which is required to be removed and/or destroyed from your credit history is carried out within the timeframes as specified in the Privacy Act. For information as to how long we can retain your credit history, please contact us or visit our website Experian Credit Services

Corrections

There may be times when you feel information we have provided about you may not be accurate or up to date. Should this be the case we ask that you contact us so that we can investigate the matter on your behalf.

If you believe that we hold information we hold about you may not be up to date, accurate or complete, you have the right under the Privacy act to apply to us for a correction of that information. To make a correction request you should:

- (a) apply for access to your credit reporting information;
- (b) note the specific information you seek to correct and provide all reasonable details of why you believe the information is not correct, complete or up to date;
- (c) attach all relevant materials which support your belief that the relevant information is not correct, complete or up to date.

On receipt of this information we will investigate and use all reasonable endeavours to resolve the issue within 30 days from receipt of your correction request. We may require further information or details from you to complete our investigation your request. Depending on the nature of the correction we may require further information from or the assistance of another party such as



another credit reporting body or credit provider to investigate or resolve the correction request. Where Experian is not the original provider of the information, we will liaise with the relevant parties to investigate the accuracy of the information we hold.

We will endeavour to complete this process within 30 business days and after this time, will advise you of the outcome. Where the investigation is complex or requires we may seek your agreement to allow more time for the investigation and resolution. Where following our investigation we determine that a correction is warranted we will take all reasonable steps to correct our records.

Complaints

Experian Credit Services prides itself on the level of customer service we provide and takes every effort to ensure our compliance with the Privacy Act. Should you feel that we have breached our obligations, we ask that you first raise the matter with us by sending us a notice with the following:

- (a) identifying who you are;
- (b) providing details (if known) of the obligation (code, law or contract) you feel we have breached;
- (c) providing reasonable information about the breach and the circumstances of the breach.

On receipt of a notice we will refer the matter to our claims investigation team who will investigate the details set out in your notice. We may request additional information or documents from you supporting your position. We will endeavour to investigate and provide you with notice of the outcome of our determination within 30 business days.

If your concern relates to the correction of information we hold about you, we would request that you seek a correction in accordance with the process described above before submitting a complaint.

If you are not satisfied with the outcome of our investigation, you may escalate the matter to the Privacy Commissioner or our external dispute resolution scheme using the details below. Contact details for both parties are as follows:

Office of the Australian Information Commissioner
GPO Box 5218 Sydney NSW 2001
Our External Dispute Scheme:
Credit Ombudsman service Limited
PO Box A252
Sydney South NSW

Further information

This Policy Statement reflects general information on how we:

- (a) comply with our obligations under the Privacy Act;
- (b) collect, hold, use, disclose and manage your personal information; and
- (c) provide credit reporting business services to our clients and to consumers.

This Policy Statement is not legal advice and is not intended to replace the rights, duties and obligations a party has under the Privacy Act. Nothing in this statement is intended to create or impose rights, remedies or obligations additional to those set out in the Privacy Act. All reasonable care has been taken by Experian Credit Services to prepare and keep this statement up to date, however, the information contained in this policy is not intended to be a warranty or representation or otherwise to create any legal contractual relationship or obligations between you and Experian Credit Services.



Call us: 1300 783 684

Call Centre Hours of Operation:

9am to 5pm Monday to Friday, AEST (Closed Public Holidays)

E-mail us: creditreport@au.experian.com

Other ways to contact us:

Fax: 02 8405 3369

Postal: Experian Australia Credit Services Pty, Ltd.

Attn: Consumer Support

P.O. Box 1969,

North Sydney 2060 NSW

Keypoint Law

16 June 2017