POL-ADMIN-527

Credit Reporting and Credit Related Personal Information Policy

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1 Scope

This policy applies to Geraldton Fuel Company Pty Ltd (Trading as Refuel Australia (ABN 29 002 844 162) and its subsidiaries (as that expression is defined in the *Corporations Act 2001* (Cth)) (individually and collectively "**we**", "**us**", as the context requires).

2 Purpose

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

This Credit Reporting Policy is intended to enhance the transparency of our operations, to notify you of your rights and our obligations, and to provide you with information regarding:

1. the kinds of Credit Information which we will collect and hold;
2. how we collect, hold, use, and disclose Credit Information;
3. the purposes for which we collect, hold, use, and disclose Credit Information;
4. how you may access Credit Information held by us and seek correction of such information;
5. how you may complain about a breach of the *Privacy (Credit Reporting) Code 2014* (Cth) ("**CRC**") and how we will deal with such complaints;
6. whether we are likely to disclose Credit Information to overseas recipients; and
7. if we are likely to disclose Credit Information to overseas recipients, the countries in which such recipients are likely to be located.

This Credit Reporting Policy sets out how we comply with our obligations under the *Privacy Act 1988* (Cth) ("**Act**") and the CRC.

3 Acknowledgement

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

Whilst we cannot warrant that this Credit Reporting Policy will be followed in every instance, we will endeavour to follow this Credit Reporting Policy. We have educated and trained our employees with the compliance requirements and have appropriate procedures in place to manage Credit Information.

4 Procedure

4.1 The kinds of Credit information which we will collect and hold

We collect and hold the following types of Credit Information:

1. Current and prior names and addresses, your age or date of birth, and occupation.
2. Drivers licence number.
3. Credit and/or debit card information (for the purposes of processing payment(s)).

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

4.2 How we will collect use and disclose your Credit information

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

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

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

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

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

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

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

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

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

Where stored in electronic form on our IT system, we will take steps to protect the information against modification, disclosure, or misuse by including such things as physical restrictions, password protections, two-factor authentication, internal and external firewalls, and anti-virus software.

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

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

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

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

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

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

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

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

4.5 Disclosure to CRBs

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

We may disclose your Credit Information to the following CRBs listed below.

Equifax Australia	**Creditor Watch**	**NCI**	**Illion**	**Experian**
GPO Box 94 North Sydney NSW 2059 Tel: 13 8332	GPO Box 276 Sydney NSW 2001 Tel: 1300 501 312	PO Box 3315, Rundle Mall SA 5000 Tel: 1800 882 820.	PO Box 7405, St Kilda Road, Melbourne VIC 3004 Tel: 13 23 33	GPO Box 1969, North Sydney NSW 2060 Tel: (02) 8907 7200

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

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

4.5.1 Disclosure of your Credit Information to other recipients

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

1. other credit providers;
2. our related companies;

3. debt collection organisations;
4. government agencies;
5. personal representatives;
6. guarantors or security providers in relation to the credit we provide you;
7. debt assignment organisations; and
8. credit insurers.

In some instances, we will require your written consent prior to making such disclosures. We typically obtain this consent via our privacy statement, which is contained in our credit application.

4.6 How you may access your Credit information

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

We will endeavour to respond to your request for Credit information within a reasonable time period or as soon as practicable in a manner as requested by you. We will normally respond within thirty (30) days.

You can make a request for access by sending an email or letter addressed to our office, the details of which are as follows.

Geraldton Fuel Company Pty Ltd (Refuel Australia)

Address: 120 Flores Road, Geraldton, WA 6530

Telephone (08) 9920 8000

Email: reception@refuelaus.com.au

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

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

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

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

4.7 Correction

Should we hold Credit information, and it is inaccurate, out of date, incomplete, irrelevant, or misleading, or incorrect you have the right to make us aware of this fact and request that it be corrected.

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

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

It is our normal policy to resolve any correction requests within thirty (30) days. If we require further time, we will notify you in writing and seek your consent.

Should we refuse to correct your Credit information written notice will be provided to you setting out:

1. the reasons for the refusal (except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so); and
2. the mechanisms available to complain about the refusal; and
3. any other matter prescribed by the regulations.

4.8 Record Keeping

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

The types of matters recorded by us include the following:

1. Where Credit Information is destroyed to meet obligations and compliance requirements in accordance with the CRC and the Act.
2. Where we have received Credit Information from another credit provider:
    a. the date on which it was disclosed;
    b. a brief description of the information disclosed; and
    c. to whom the disclosure was made.
3. Records of any consent provided by an individual for purposes of disclosure.
4. Records of any correspondence and actions taken in relation to notifications or corrections, complaints, pre-screening, monitoring, and auditing.

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

4.9 Complaints

If you wish to make a complaint about a failure of us to comply with our obligations in relation to the Act or the CFC please raise this with our office on the details provided above.

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

We will then endeavour to respond to your complaint and attempt to resolve the issues within thirty (30) days.

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

If you are not satisfied with the process of making a complaint to our office, you may make a complaint to the Information Commissioner, the details of which are below.

Office of the Australian Information Commissioner (OAIC)

Address: GPO Box 5288, Sydney NSW 2001

Telephone: 1300 363 992

Facsimile: (02) 6123 5145

Information Commissioner

The Information Commissioner can decline to investigate a complaint on several grounds including, among other things, where the complaint wasn't made at first to us.

4.10 Disclosure to overseas recipients

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

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

We currently do not share or disclose Credit information overseas.

If you have any queries regarding our Credit Reporting Policy or wish to find out more regarding any of our other policies, please contact our officer on the details listed above.

5 Responsibilities

5.1 Policy Management

The Managing Director has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations.

Reviews of the Policy are the responsibility of the Refuel Australia Quality Manager and will be conducted on a regular basis. This is to ensure that the policy remains consistent with all relevant legislative requirements as well as the changing nature of the company.

5.2 Policy Implementation

The Administrations Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

Managers at all levels are responsible for ensuring those reporting to them:

1. understand and comply with this policy; and
2. are given adequate and regular training on its content

All employees are responsible for following the policy to the extent that it affects their day- to-day work and in respect of the reporting requirements

6 References

6.1 Legislation

1. *Corporations Act 2001* (Cth)
2. Privacy Act 1988 (Cth)
3. Privacy (Credit reporting) Code 2014 (Cth) ("CRC")
4. Freedom of Information Act 1992

6.2 Associated Policies

1. Privacy Policy

6.3 Other documentation

1. Terms and Conditions for the Provision of Services

7 Appendices

There are no appendices associated with this policy.

8 Document Control Management

8.1 Document Information

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8.2 Document History

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