



TR Group AU Pty Ltd

Privacy and Credit Reporting Policy

Document number: FIN-CREDIT-003

Approval

Policy owner	Group Financial Controller (TR Group NZ)		
Approved by	General Manager		
Date approved	1 November 2023	Review date	

1. Purpose

This document is the Privacy Policy of TR Group AU Pty Ltd (ABN 97 064 451 49) (the company, we, our, us). It also includes our Credit Reporting Policy, which is found in section 8 The purpose of this Privacy Policy is to:

1. Clearly communicate our personal information handling practices;
2. Enhance the transparency of our operations; and
3. Give individuals a better and more complete understanding of the kinds of personal information that we collect and hold, the method of its collection and the purposes for which it is collected.

2. Scope

This Privacy Policy explains our general information handling practices across the various business segments of our Company, including:

1. Information about what personal information we collect from you and how and why we collect, use, disclose and store your personal information;
2. Explanation of our personal information handling practices in relation to specific Company functions or activities such as complaint handling and policy advice. Here you will find what sort of records we keep and why; and
3. Further information as to the process of accessing and correcting your personal information.

3. Our obligations under the privacy act

In this Privacy Policy, 'personal information' has the same meaning as in section 6 of the Privacy Act 1988 (Cth) (Privacy Act). This definition is as follows: "personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

1. whether the information or opinion is true or not; and
2. whether the information or opinion is recorded in a material form or not.

4. Types of personal information we collect

The types of personal information that we may collect about you includes:

- i. name;
- ii. mailing or street address;
- iii. email address;
- iv. telephone number;
- v. age or birth date;
- vi. profession, occupation or job title;
- vii. details of the products and services that you (or your related company or other entity) have acquired from us or which you have enquired about, together with any additional information necessary to deliver those products services and to respond to your enquiries;

At or before the time we collect personal information from you, we will take reasonable steps to ensure that you are aware of:

- i. Our Company's identity and how to contact us;
- ii. The fact that you are able to gain access to and correct your personal information;
- iii. The purpose for which your personal information is collected;
- iv. The organisations (including overseas recipients) to which our Company usually discloses your personal information.

5. Collection of personal information

It is our usual practice to collect personal information directly from you or your representatives where it is reasonable and practicable to do so.

Sometimes we collect personal information from third parties such as our network of dealers and resellers or a publicly available source, but only if you have consented to such collection or would reasonably expect us to collect your personal information in this way.

We collect personal information as part of our normal communication processes directly related to the purposes outlined in this Privacy Policy, including:

- When you email or telephone our representatives;
- When you complete an application or purchase order; or
- When you hand us your business card.

6. Use and disclosure

We only collect personal information for purposes which are directly related to our business activities and operations and only when it is necessary for or directly related to such purposes. Our primary purposes for collecting personal information is for processing customer credit applications and for the provision of rental and leasing equipment.

We may disclose your personal information to our employees fulfilling requests by you, and to otherwise provide services to you. The service providers that we may disclose your information to include, without limitation, debt collectors, and professional advisors such as accountants, solicitors and consultants.

7. Credit reporting policy

Application

- i. This section 7 is our credit reporting policy. We may provide consumer credit and/or commercial credit to individuals, and this policy will apply in such circumstances. We may conduct a credit check on you, any joint account holders (or for corporate customers, any directors, partners or other authorised representatives) before credit is provided to you.
- ii. The Privacy Act and this policy do not apply to commercial credit provided to companies or other entities. However, this policy will apply where an individual applies for commercial credit or we request that a director or other authorised individual guarantees the commercial credit to be provided by us to a company or other entity. This policy will only

apply in respect of any use of individuals' credit-related information as part of any assessment of the creditworthiness of that individual that undertake and any consideration that we or our financiers undertake in relation to an individual's suitability as a guarantor.

Credit-related information

In this section 7, the term "credit-related information" means credit information, credit eligibility information and CRB derived information as those terms are defined in the Privacy Act. Generally speaking, credit-related information will include your name and address, your contact details, your date of birth and gender, details of your credit history (including any repayments missed or late repayments that you have made), information about any credit provided to you by credit providers, any credit rating or credit assessment score that we have derived or that is provided to us by a credit reporting body and details of any credit-related court proceedings or insolvency applications that relate to you.

Collection of credit-related information

In addition to collecting personal information about you, we may collect the following particular types of credit-related information about you:

- i. Your name and address (including previous addresses);
- ii. Your contact details (including telephone and email addresses);
- iii. Your date of birth and gender;
- iv. Your credit history (including any repayments missed or late repayments that you have made);
- v. Details of any credit provided to you by other credit providers (such as other financial institutions, utilities or telecommunications providers);
- vi. Any credit rating or credit assessment score that we have derived or that is provided to us by a credit reporting body; and
- vii. Details of any credit-related court proceedings or insolvency applications that relate to you.

We may obtain this information from you or from third parties, including from credit reporting bodies and other credit providers in order to assist us in determining whether we or our financiers will provide any credit to you (or to your related company or other entity).

Our use and disclosure of your credit-related information

- I. We may use the credit-related information that is collected and held by us to help us decide whether or not to provide credit to you (or to your related company or other entity).
- II. The credit-related information that we hold about you may be used by us in accordance with Part IIIA of the Privacy Act and the Credit Reporting Code. The purposes for which we use your credit-related information may include:
 - Using your credit-related information to assess any application that you make to us for credit (or which is made by your related company or other entity);
 - Using your credit-related information to collect payments that are owed to us in respect of any credit that we have previously provided to you (or to your related company or other entity);
 - Where you have offered to guarantee credit that we have offered to provide to your related company or entity, to assess your suitability as a guarantor of that credit;
 - Disclosing your credit-related information to a third party that you or we ask to act as a guarantor of any credit provided to you;
 - Disclosing your credit-related information to the credit reporting bodies that we typically deal with, including for example Creditor Watch/Dun & Bradstreet / Equifax (previously known as Veda). Credit reporting bodies collect different types of credit-related information about individuals and use that information to provide a credit-related service to their customers (including to us);
 - Disclosing your credit-related information to other third parties that provide services to us (or to you on our behalf). These might include debt collectors, credit management agencies and other third parties that process applications for credit made to us;
 - Using and disclosing credit-related information that we hold about you to assess and respond to any access or correction requests that you make to us;
 - Using and disclosing credit-related information that we hold about you as required by law or the order of a court or tribunal; and
 - Where you otherwise expressly consent to the use or disclosure.

Disclosure of personal information to credit reporting bodies

We may disclose your credit-related information to a credit reporting body and you should be aware that:

- i. the credit reporting body may include the information in reports provided to other credit providers to assist them to assess your credit worthiness;
- ii. if you fail to meet your payment obligations in relation to consumer credit or if you commit a serious credit infringement, we may be entitled to disclose this to a credit reporting body;
- iii. you may obtain the credit reporting body's policy about the management of credit-related personal information by accessing their websites:
 - a. Dun & Bradstreet: <https://www.dnb.com/utility-pages/privacy-policy.html>
 - b. Equifax: <https://www.equifax.com.au/privacy>
 - c. Creditor Watch: <https://creditorwatch.com.au/privacy>
- iv. you have the right to request credit reporting bodies to not use their credit reporting information for the purposes of pre-screening of direct marketing by a credit provider; and
- v. you have the right to request credit reporting bodies to not 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.

Please note that this you also have the right to request a copy of this Privacy Policy (including the above notifiable matters) to be provided to you via another format, ie in hard copy or by email.

Other matters relating to your credit-related information

- i. Where required by law, we will make a written note (which may be kept in electronic form) of any use or disclosure that we make relating to your credit-related information.
- ii. If:
 - You (or your related company or other entity) make an application for credit to us; or
 - You offer to guarantee credit that we propose to provide to your related company or other entity,

and we subsequently refuse your application or offer based on information provided to us by a credit reporting body about you, we will inform you of this and provide you with the name and contact details of that body and any other information required by law to be provided to you.

Access and correction

You have a right to request access to, or the correction of, any credit-related information that we hold about you. You may request access to any credit-related information that we hold about you in accordance with section 10 of this policy.

Complaints

- i. You may complain about any failure by us to comply with Part IIIA of the Privacy Act or the Credit Reporting Code. If your complaint relates to our failure to provide access to or to correct any credit-related information that we hold about you, you may lodge a complaint directly with the Office of the Australian Information Commissioner (for more information, please see <http://www.oaic.gov.au>). If we are required by law to be a member of an external dispute resolution scheme, you can also lodge a complaint relating to access to or correction of your credit-related information with that organisation. If this applies, we notify you of this and the identity of the external dispute resolution provider at the time that you make a credit-related complaint. If your complaint does not relate to these matters, you must first lodge a complaint with us in accordance with the procedure set out in section 11 of this Policy, which sets out how we will deal with such complaints.
- ii. If you make a complaint in relation to correction of your credit-related information, we will notify each other credit provider and credit reporting body to which we have previously disclosed that information that you have made a correction complaint in relation to that information and the outcome of that complaint, unless it is impracticable or illegal for us to do so.

8. Data Quality

We undertake to take steps to ensure that the personal and credit-related information that we collect, use or disclose is accurate, complete and up-to-date. These steps include maintaining and updating personal information databases when we are advised by you that your information has changed or is incorrect.

9. Data security

We undertake to protect the personal and credit-related information that we collect and hold against loss, use, unauthorised access, modification or disclosure and against other misuse. These steps include password protection for accessing our electronic IT systems, securing paper files in locked cabinets and other physical access restriction.

When the personal and credit-related information that we collect is no longer required for the purpose for which it was collected (or when we are no longer required by law to retain it whichever is the later), it is destroyed in a secure manner or de-identified.

10. Access and correction

You may request access to any personal or credit-related information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee (not exceeding A\$50) to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal or credit-related information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that any personal or credit-related information that we hold about you is incorrect, incomplete or inaccurate, then you may request that we amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then you may request that we add a note to the personal information stating that you disagree with it.

For any credit-related information that we hold about you, we will:

- i. respond to your request for the correction of your credit-related information within 30 days (or such longer period as you may agree or we may request). If we cannot respond to your correction request without consulting with other credit providers or credit reporting bodies in relation to your request, we may do so and these bodies are permitted by law to assist us in resolving your correction request;
- ii. if we agree to your request, promptly correct any credit-related information that we hold about you that we are satisfied is inaccurate, out-of-date, incomplete, irrelevant or misleading. If we do correct your credit-related information at your request, we will inform you and each other credit provider and credit reporting body to which we have previously disclosed that information that we have corrected your information. Where we disclosed your credit-related information after you made a complaint but before it was resolved, we will tell the recipient that you have made such a complaint and we will subsequently inform that entity of the outcome of your correction request; and

- iii. if we have any other reasons for suspecting that the credit-related information that we hold about you has become inaccurate, out-of-date, incomplete, irrelevant or misleading, independently correct this information without consulting you. If we do this, we will take reasonable steps to notify that correction to you and to any other entities to which we have previously disclosed that credit-related information (unless it is impracticable for us to do so).

11. What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

If your complaint relates to our failure to provide access to or to correct any personal or credit-related information that we hold about you, you may lodge a complaint directly with the Office of the Australian Information Commissioner (for more information, please see <http://www.oaic.gov.au>). If we are required by law to be a member of an external dispute resolution scheme, you can also lodge a complaint relating to access to or correction of your credit-related information with that organisation. If this applies, we notify you of this and the identity of the external dispute resolution provider at the time that you make a credit-related complaint.

Otherwise, if you have a complaint in relation to our handling of your personal or credit-related information that is not mentioned above or if your complaint relates to your personal information, you must first lodge your complaint with us using the details below and provide us with details of the incident so that we can investigate it.

We will treat your complaint confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

If you are not satisfied with our handling of your complaint or our proposed resolution, you have a right to lodge a further complaint with the Office of the Australian Information Commissioner (for more information, please see <http://www.oaic.gov.au>). The Office of the Australian Information Commissioner can provide you with further information about the next steps in its complaints process. If your complaint relates to credit-related information that we hold about you and we notify you that we are required by law to be a member of an external dispute resolution scheme, you may instead lodge your complaint with that organisation. If this applies, we notify you of this and the identity of the external dispute resolution provider at the time that you make a credit-related complaint.

Where your complaint relates to the correction of your credit-related information and the resolution of your complaint requires us to correct your information, we will notify other credit providers and credit reporting bodies that we have previously disclosed your information to, that you have made a correction complaint in relation to that information and that we have corrected your information as a result of the outcome of that complaint. However, if it is impractical or illegal for us to do so we are not required by law to give this notification.

12. What is the process for complaining

If you have any questions about this policy, any concerns or a complaint regarding the treatment of your personal or credit-related information or want to notify us of a possible breach of your privacy, please contact our Privacy Officer at the details given below:

Privacy Officer
TR Group AU Pty Ltd
89-95 Boundary Road, Laverton North, VIC 3026

Telephone : 1800 50 40 50
Email : privacyofficer@trgroupau.com

13. Changes to our policy

We may change this policy from time to time, including to comply with any changes to the Privacy Act. Any updated versions of this policy will be posted on our website and will be effective from the date of posting.

This policy was last updated on 7 August 2023.