



# Privacy & Credit Reporting Policy

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Embrace the Power of Small

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# 1. Our Privacy & Credit Reporting Policy

## 1.1 What information is covered in this Policy?

This Policy tells you how Judo will:

- collect
- use
- disclose; and
- manage

your personal information, credit information and credit eligibility information.

### NOTES ABOUT THIS POLICY:

When you see the words “our”, “us”, “we” or “businesses” we are referring to Judo Capital Pty Ltd (ACN 615 995 581).

## 1.2 Why does Judo have a Privacy & Credit Reporting Policy?

- 1) Judo has a Privacy & Credit Reporting Policy to help you clearly understand how your personal and credit information is managed. It is important to us that you are confident we respect the privacy of your personal and credit information and feel reassured that we will manage it appropriately.
- 2) The way we manage your personal and credit information is governed by the Privacy Act 1988 (Cth) (**Privacy Act**), Australian Privacy Principles, Privacy (Credit Reporting) Code 2014 (as amended) (**CR Code**) and other applicable registered privacy codes.

## 2. Definitions

### 2.1 What is personal information?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable from that information.

### 2.2 What is credit information?

Credit information is defined in the Privacy Act and relates to an individual's credit-related dealings with Judo.

Credit eligibility information is defined in the Privacy Act and is related to an individual's credit-related dealings with other credit providers, including:

- 1) credit reporting information, as defined in the Privacy Act, provided by credit reporting bodies; and
- 2) credit worthiness information, which we derive from credit reporting information.

### 2.3 Why do we need your personal and credit information?

We collect, hold, use and disclose your personal and credit information for the purpose of carrying out our business functions or activities. These functions and activities include:

- 1) providing our products and services to you;
- 2) establishing your identity;
- 3) providing you with information about other services that we offer that may be of interest to you;
- 4) checking whether you are eligible for the products and services;
- 5) assisting us in managing our products and services;
- 6) facilitating our internal business operations, including the fulfilment of any legal requirements;
- 7) analysing our services and customer needs with a view to improving those services; and
- 8) contacting you to provide a testimonial or a client satisfaction survey for us.

As a current or prospective customer or client or relevant employee or officer, we may need your personal and credit information so that we can provide you or your relevant entity with our services and products.

## 2.4 What type of personal and credit information do we collect?

The types of personal information we may collect from you include (but is not limited to):

- 1) Name;
- 2) Date of birth;
- 3) Residential address;
- 4) Postal address;
- 5) Email address;
- 6) Telephone numbers;
- 7) Your occupation and place of work;
- 8) Financial information (including nominated bank account details (including internet banking log-in details and account numbers), tax file number, transactional history (e.g. payment history and loan balances);
- 9) The type and amount of credit sought in a credit application made by you or by a person for whom you were, or were proposed to be, guarantor, and names of relevant credit providers to whom application was made;
- 10) Details of other credit providers to you, including the nature and maximum amount of credit to be provided, and dates of those arrangements;
- 11) Information about any defaults by you, or a person for whom you are guarantor, on other credit facilities;
- 12) Payments and/or any new arrangements in respect of any defaults previously recorded with a credit reporting body;
- 13) Details about court proceedings and personal insolvency information relating to you;
- 14) Whether, in the opinion of another credit provider, you have committed a serious credit infringement; and
- 15) Information about your history of making repayments in relation to other credit facilities.

## 3. Collecting your personal and credit information

### 3.1 How does Judo collect your personal and credit information?

The main way we collect personal and credit information about you is when you give it to us, or we receive it from a guarantor or anyone else listed on a credit application form, for example, when you complete a form, application or survey or contact us to ask for information.

Judo collects credit information from individuals, where lawfully permitted to do so, in various ways including:

- 1) collecting information submitted to us on a credit application;
- 2) from a credit reporting body; and
- 3) from another credit provider.

Judo may also collect your personal information in any of the following ways:

#### 1) Social media:

If you access a social media page operated by us or on our behalf, the information we collect about you may also include:

- your user ID and/or user name associated with that social media service;
- any information or content you have permitted the third party social media service to share with us, such as your profile picture or email address; and
- any information you have disclosed about yourself in connection with that social media service.

#### 2) Internet:

##### Website

- Each time you visit our website, we may collect information about your use of the website. This may be from internet browsing, mobile or tablet applications.

##### Cookies

- We may use technology called 'cookies' when you visit our site.

Pop-up: Cookies can record information about your visit to our site. The cookies we send to your computer cannot read your hard drive or command your computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved by any non-Judo Capital site.

#### 3) Private messaging:

- We may invite you to send your details to us via private messaging, for example, to answer a question about your account.

#### 4) Participation in activities or competitions:

You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

## 4. Storing your personal and credit information

### 4.1 How does Judo store your personal and credit information?

The security of your personal and credit information is important to us.

We take reasonable measures to ensure that your personal and credit eligibility information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

- 1) We store your personal and credit information in different ways, including in paper and in electronic form.
- 2) We may use cloud storage to store the personal and credit information we hold about you. Where we receive credit eligibility information, we will store and maintain those records in accordance with the Privacy Act and the CR Code.

## 5. Disclosing your personal and credit information

### 5.1 Can Judo disclose your personal information or credit details?

#### PERSONAL INFORMATION DISCLOSURE

In order to perform the functions and/or activities described above, we may disclose your personal information to any of the persons or organisations described below:

- 1) our related entities (if any) to facilitate our and their internal business processes and other organisations with whom we have affiliations so that those organisations may provide you with information about our services and various promotions;
- 2) third party service providers, who assist us in operating our business (including credit reporting bodies and technology service providers) (Note: these service providers may not comply or be required to comply with our privacy policy);
- 3) debt collectors;
- 4) our financial advisers, legal advisers or auditors;
- 5) organisations involved in a corporate re-organisation or involved in a transfer of all or part of the assets or business of our organisation;
- 6) organisations involved in the payments systems including financial institutions, merchants and payment organisations; or
- 7) as required or authorised by law and/or where you have given your consent.

Where practical, Judo will take reasonable steps to ensure that third parties to whom we disclose your personal information are subject to confidentiality requirements in relation to that information.

We will not sell your personal information to other companies or organisations without your prior consent.

#### CREDIT DISCLOSURE

- 1) To enable Judo to assess your credit application, Judo may, where you have given your consent:
  - a. obtain from a credit reporting body a credit report containing personal information about you as listed on the credit application, pursuant to section 21H of the Privacy Act; and
  - b. obtain a report from a credit reporting body, and other information in relation to the commercial credit activities of all individuals listed on the credit application.
- 2) In accordance with section 21J of the Privacy Act, Judo may, where you have given consent, give to, and obtain from, any credit provider named in the credit application and credit providers that may be named in a credit report issued by a credit reporting body, information about your credit arrangements. Credit reporting information can be used for the purposes of assessing an application for credit, assisting you to avoid defaulting on your credit obligations, assessing credit worthiness, assessing whether Judo ought to accept you as a guarantor in relation to an application for credit and internal management, assessing whether you have committed a serious credit infringement, being purposes directly related to the provision or management of credit.
- 3) Judo may disclose credit information to the following credit reporting bodies:

Veda Advantage  
Veda - Customer Resolutions  
PO Box 964  
NORTH SYDNEY NSW 2059  
1300 762 207  
corrections@veda.com.au  
www.mycreditfile.com.au

Dun and Bradstreet  
Attn: Public Access Centre  
PO Box 7405  
ST KILDA RD VIC 3004  
1300 734 806  
pac.austral@dnb.com.au  
www.dnb.com.au

Experian Australia  
Attn: Credit Report  
PO Box 1969  
NORTH SYDNEY NSW 2060  
1300 783 684  
creditreport@au.experian.com  
www.experian.com.au

- 4) Each of these credit reporting bodies are required to have a policy about how they manage credit-related personal information. These policies can be accessed by a credit provider. This request should be made directly to the credit reporting body.
- 5) Judo may also disclose credit information to debt collectors and as otherwise permitted under the Privacy Act.

#### OVERSEAS RECIPIENT DISCLOSURE

We may disclose your personal and credit information to overseas recipients. Prior to disclosing your personal and credit information to an overseas recipient, we will take all reasonable steps to ensure that:

- 1) The overseas recipient does not breach the Australian Privacy Principles; or
- 2) The overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way the Australian Privacy Principles protect the information; or
- 3) You have consented to us making the disclosure. Acceptance of any of our services via an application in writing, orally or by electronic means, will be deemed as giving consent to the disclosures detailed herein.

## 6. Accessing and correcting your personal and credit information

### 6.1 How can you access and correct your personal and credit information?

Judo strives to keep accurate, complete and up-to-date records of the personal information we collect, so far as practical. Accuracy depends on the information provided to Judo.

You have a right to seek access to your personal information held by Judo and that right extends to correction of the information if it is inaccurate, out-of-date or incomplete. If you wish to query the accuracy of personal information held about you or update that information, you may contact us as set out below. Additionally, Part IIIA of the Privacy Act allows individuals to obtain confirmation of whether or not we hold credit eligibility information about them, as well as gain access to, or correct, the personal information we hold in certain circumstances.

There are no fees associated with making a request to access or correct your information. However, we may charge a reasonable fee for processing the request, to account for locating the information and supplying it to you.

We may refuse to give you access to the personal information we hold about you if we reasonably believe that giving you access would:

- 1) pose a serious threat to the life, health or safety of an individual;
- 2) have an unreasonable impact on the privacy of other individuals; or
- 3) we consider the request to be frivolous or vexatious.

If you wish to access or correct any of the personal information we hold about you, please email us at [contactus@judocapital.com.au](mailto:contactus@judocapital.com.au) or contact us by phone on 03 8612 7256.

## 7. Making a complaint

### 7.1 What can you do if you are not satisfied with the way Judo manages your personal and/or credit information?

If you are not satisfied with how we manage your personal and/or credit information you can make a complaint directly to Judo's Privacy Officer in the first instance. Judo will follow these steps to address and manage your complaint:

- 1) Make a record of your complaint.
- 2) Acknowledge your complaint within seven days.
- 3) Take steps to correct any deviation from Australian Privacy Principals.
- 4) Provide you with a decision on your complaint within 30 days.

If you wish to make a complaint about the management of your personal and/or credit information please email our Privacy Officer at [contactus@judocapital.com.au](mailto:contactus@judocapital.com.au) or contact us by phone on 03 8612 7256.

If you are dissatisfied with the response of our complaints officer you may make a complaint to:

THE OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER WHICH CAN BE CONTACTED ON EITHER [WWW.OAIC.GOV.AU](http://WWW.OAIC.GOV.AU) OR 1300 363 992.

## 8. Changes to Judo's Privacy & Credit Reporting Policy

### 8.1 How will I find out if any changes are made to this Policy?

Judo may change this Privacy & Credit Reporting Policy at any time.

- 1) Any changes to our Privacy & Credit Reporting Policy will be publicised on our website.
- 2) This Privacy & Credit Reporting Policy came into existence on 2<sup>nd</sup> May 2017.

You can access the latest and most up-to-date version of our Policy on our Website:  
[www.judocapital.com.au](http://www.judocapital.com.au)

## 9. More information on Judo's Privacy & Credit Reporting Policy

### 9.1 Where can I find out more information on this Policy?

For more information about:

- 1) any issue raised in this Privacy & Credit Reporting Policy or any other concerns, please contact us:

Phone: 03 8612 7256

Email: [contactus@judocapital.com.au](mailto:contactus@judocapital.com.au)

Post: Privacy Officer

c/o Judo Capital Limited

Level 32

367 Collins Street

MELBOURNE VIC 3000

- 2) privacy in general, you can visit the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).