



## John Hughes Group Credit Reporting Policy

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This Credit Reporting Policy applies in addition to the John Hughes Group (**Group**) Privacy Policy. It applies where you apply for or obtain credit from a Group entity (**Entity**), including those noted in the Privacy Policy.

This Credit Reporting Policy outlines how we collect, hold, use, disclose and protect your credit-related personal information, including your credit applications and accounts with us and information obtained from credit reporting bodies (**CRBs**).

It applies to the following entities within the Group:

JHG Financial Services Pty Ltd; Rohanna Pty Ltd ATF Skippers Unit Trust; Sovereign Credit Pty Ltd.

In this Credit Reporting Policy, unless the context requires otherwise, a reference to 'we', 'us' or 'our' is a reference to the applicable Entity from the above list.

You should ensure that you review our Privacy Policy in addition to this Credit Reporting Policy. If you would like a copy of our Privacy Policy, then please submit a request or visit [www.johnhughes.com.au](http://www.johnhughes.com.au).

## 1 Collecting credit information

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### 1.1 What is credit information?

As a credit provider, we collect, hold, use and disclose certain credit information about individuals who are, or apply to be, customers for consumer credit, or guarantors for consumer or commercial credit.

We may collect and hold any type of credit information about you as permitted by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Credit Reporting Privacy Code. We may collect this information directly from you, or from other third parties such as CRBs. The types of credit information we may collect includes:

- identity particulars such as your name, gender, address (and previous 2 addresses), date of birth, name of employer and driver's licence number;
- the fact that credit has been applied for with us and the amount and type of credit;
- details of other credit providers relevant to you;
- details of the start and end dates of credit granted to you and certain terms and conditions of your credit arrangements (such as repayment conditions);
- repayment history information (such as whether you have met payment obligations and the date of payment);
- more specific default information, including information about payments which are more than 60 days overdue, subsequent repayments or if you have entered into a new credit arrangement as a result of a default;
- confirmation of previous information requests to CRBs made by other credit providers, mortgage insurers and trade insurers;

- whether, in our or another credit provider's opinion, you have committed a serious credit infringement (e.g. acted fraudulently);
- the fact that credit provided to you has been paid or otherwise discharged;
- court proceedings information, personal insolvency information and credit-related publicly available information; and
- scores, ratings, summaries, evaluations and other information relating to credit worthiness which is derived by us or by CRBs wholly or partly on the basis of the information above and which indicated your eligibility for consumer credit.

Where we collect credit information from a CRB, we may use that information to produce our own assessments and ratings in respect of an individual's credit worthiness.

## **1.2 What is the purpose for collecting credit information?**

We collect your personal information for the purpose of providing you with our credit services. This may include using your credit information to form decisions as to whether to provide you with credit or accept your guarantor application, to manage and review your credit and to participate in the credit reporting system.

## **1.3 How do we collect credit information?**

We collect credit information in the same way that we collect personal information, as outlined in the Privacy Policy.

In addition, we may collect credit information from other credit providers, from the usage and repayment of any account you hold with us or from CRBs. If you are a guarantor, this may include obtaining from a CRB, credit reports containing personal information about you and any other information deemed necessary to assess whether to accept you as a guarantor for the credit applied for or given to the applicant.

In addition, some of the personal information we collect from you, is collected as required or authorised by the *Personal Properties Securities Act 2009* (Cth), the *National Consumer Credit Protection Act 2009* (Cth) and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

## **2 How we use and disclose your credit information**

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### **2.1 Credit information and credit eligibility information**

We only hold, use and disclose your credit information for the purposes outlined in section 1.2, as outlined in the Privacy Policy, or for related purposes which might reasonably be expected, unless we otherwise obtain your consent.

To do this, we may disclose your credit information to Entities within the Group, or third parties outside the Group who:

- are considering becoming a guarantor or a person considering offering property as security for the credit in order for them to determine whether to act as guarantor, or to keep that person informed about the guarantee;
- undertakes debt collection in relation to the credit;
- are named in an application for credit or guarantee, such as your employer;
- are a transferee from us of the credit; or
- are parties involved in loan securitisation arrangements.

Further, we may disclose your credit eligibility information to another credit provider in order to assess your credit application or a guarantor application, to help you avoid a default or to tell them of any default you may have had, but only with your consent.

Please see section 2.1 'Using and disclosing personal information' in our Privacy Policy for more details of how we may use your personal information.

## **2.2 Disclosure of credit information to CRBs**

We may disclose your personal information to CRB's for purposes such as those described above in section 1.2 or where the Privacy Act permits us to do so. For example, if you fail to meet your payment obligations in relation to consumer credit provided by us or if you commit a serious credit infringement, we may be entitled to disclose this to CRBs.

CRBs may include credit information provided by us in the reports given to other credit providers to assist them in assessing your credit worthiness.

We share credit information with the following CRBs:

- Veda Advantage Ltd: [www.veda.com.au/contact-us](http://www.veda.com.au/contact-us)

Additional obligations, privacy consents and notifications may also apply for our credit products. This Credit Reporting Policy is not intended to limit or exclude these provisions.

## **2.3 Opting out of CRB's direct marketing pre-screenings**

A CRB may use your credit reporting information to assist us to pre-screen you for direct marketing by us. This process is known as a 'pre-screening'. If you do not want any of the CRBs listed above to use your information for the purpose of pre-screening, you have the right under the Privacy Act to contact them and request that they exclude you.

## **2.4 If you are a victim of fraud (including identity-related fraud)**

You are entitled under the Privacy Act to request that a CRB not use or disclose credit reporting information they hold about you in circumstances where you reasonably believe that you have been, or are likely to be, a victim of fraud, including identity-related fraud. The period while this applies is called a "ban period". You can make such a request to any of the CRBs listed above.

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