

Credit Reporting Policy

Baron Insulation Pty Ltd

ACN 132 459 931

What is this Credit Reporting Policy about?

This Credit Reporting Policy describes how Baron Insulation Pty Ltd (Baron Insulation, we, us or our) will manage your credit information and your credit related personal information (which means credit information, credit reporting information, credit eligibility information and/or regulated information) including the collection, holding, use and disclosure of such information. Our handling of your credit information is in compliance with our obligations under the *Privacy Act 1988* (as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*) (**Act**) and the *Privacy (Credit Reporting) Code (Code)*.

We acknowledge that we must take reasonable steps when handling credit information. We have educated and trained our employees with the compliance requirements and have appropriate procedures in place to manage credit information. This document is to be read together with our Privacy Policy, available here <https://fletcherbuilding.com/privacy-statement/>.

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

- a) the kinds of credit information we will collect and hold;
- b) how we will collect, hold, use and disclose credit information;
- c) the purposes for which we collect, hold, use and disclose credit information;
- d) how you may access the credit information we hold about you and seek correction of such information;
- e) how you may complain about a breach of the Code and how we intend to deal with any such a complaint;
- f) whether we are likely to disclose credit information to an overseas recipient; and
- g) if we are likely to disclose credit information to overseas recipients, the countries in which such recipients are likely to be located (if it is practical to do so).

What Credit Information and Credit Eligibility Information do we Collect?

We may collect, use, hold and disclose credit information about you. You consent to such collection, holding, use and disclosure of your credit information in accordance with the terms of this policy.

The terms "credit information", "credit eligibility information", "credit reporting information" and "personal information", as used in this policy, are as defined in the Act.

If you apply for commercial credit or provide a guarantee for commercial credit, the kinds of credit information and credit eligibility information that we may collect and hold about you includes information used to identify you, your creditworthiness and any other related information necessary or incidental to the products and services which we provide or propose to provide to you. This may include:

- credit reporting information obtained from a Credit Reporting Body (**CRB**); and/or
- information that we derive from credit reports that has a bearing on your credit worthiness and

which is, has been, will be or could be used to establish your eligibility for credit together with any other information regarding your creditworthiness; and/or

- current and prior names and addresses, age and occupation, (including employer details); and/or
- identification information including driver's licence number and passport details; and/or
- credit liability information; and/or
- repayment history information; and/or
- payment or default information; and/or
- a statement that an information request has been made in relation to you by a credit provider; and/or
- the type of credit and the amount of credit in the application that has been made by you; and/or
- whether you have entered into arrangements with us or other creditors in connection with any credit provided to you;
- court proceedings information, personal insolvency information and credit related publicly available information personal insolvency information; and/or
- details regarding applications for commercial credit which may have been made by you including the type and amount of credit requested; and/or
- details regarding the provision of credit, the amount and whether any other credit was previously provided; and/or
- the date that any agreement in relation to credit ceased or was terminated and the surrounding circumstances; and/or
- 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 60 days; and/or
- whether in our opinion, or another credit provider's opinion, you have committed a serious credit infringement; and/or
- any administrative information about credit accounts of yourself and your related bodies corporate.

Credit information applies to both consumer credit and commercial credit.

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.

Sometimes, we may gather credit information and credit eligibility information about you from a third party, such as the kinds of information listed above, for example, from CRBs or intermediaries and spouses or from publicly available information. Such information may be derived by a CRB from credit information held by the CRB about you.

If you fail to meet payment obligations or commit serious credit infringement we may disclose your Credit Information to a CRB.

We will endeavour to obtain your written consent regarding the collection and further disclosure of credit information from and 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.

Why do we Collect your Credit Information and Credit Eligibility Information

We may collect, hold, use and disclose your credit information as reasonably necessary so that it may be used directly for our functions or activities and as permitted by law. We may not be able to provide

you with credit in respect of the products or services you require if you do not provide all of the information requested or do not consent to how your credit information and credit eligibility information is managed in accordance with this policy.

How will we Hold your Credit Information and your Credit Eligibility Information?

We will hold your credit information and credit eligibility 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. We take steps to protect your credit information and credit eligibility information against modification, disclosure or misuse by using tools such as password protection for accessing electronic IT systems and physical restrictions.

Among other techniques, we usually:

- a) store such information on a computer behind our "firewall" in a secure location;
- b) restrict the number of employees internally who can access such data; and
- c) keep hard copies of documents in lockable cabinets in a secure location.

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 relevant staff are trained with respect the security of your credit information and credit eligibility 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 your credit information and credit eligibility information in a secure manner and where possible destroy and delete records.

In the event we hold credit information and credit eligibility information that is unsolicited and we were not permitted to collect it and we cannot obtain your consent to the collection of it, the information will be destroyed as soon as practicable.

How will we Use your Credit Information and your Credit Eligibility Information?

We will collect, hold, use and disclose credit information and credit eligibility information about you to:

- assess your creditworthiness; and/or
- assess applications for credit or whether to accept you as a guarantor in relation to credit; and/or
- assist you to avoid defaulting on your credit obligations; and/or
- provide information to CRB's, participate with other the credit reporting system recognised by the Code and notify other credit providers or a CRB of a default by you; and/or
- comply with regulatory or legal requirements including the *Competition and Consumer Act 2010 (Cth)*, the *Corporations Act 2001* and amendments to these acts or regulations or codes made pursuant to these acts; and/or
- enable a third party such as an insurer to assess the risk of providing insurance; and/or
- assess whether to accept a guarantor or the risk of a guarantor being unable to meet their obligations; and/or
- assess whether to securitise and/or arrange for the securitising of the credit facility; and/or
- where applicable under the law, consider hardship requests; and/or
- assess whether to vary a credit facility we provide to you; and/or
- take debt recovery action and enforcement where necessary to recovery amounts against guarantors or where infringements have occurred; and/or

- consider and address any complaints and comply with our statutory requirements.

We will also collect, hold, use and disclose credit information and credit eligibility information about you to comply with Australian legislation, including *the Corporations Act 2001*, *Proceeds of Crime Act 1987* and *Anti-Money Laundering and Counter Terrorism Financing Act 2006* and any amendments to these acts.

Disclosure of Credit Information and Credit Eligibility Information

We may disclose your credit information and credit eligibility information to any of the following third parties:

- any regulatory, governmental organisation or industry or legal body which governs the conduct of any part of our business in any jurisdiction or as required by law or regulation; and/or
- our related bodies corporate; and/or
- other credit providers; and/or
- guarantors or security providers in relation to the credit we provide you; and/or
- credit insurers; and/or
- a third party who is supplying a service to us such as a person who manages credit provided by us; and/or
- any other third party provided that we obtain your prior written consent; and/or
- our financial advisers, legal advisers or auditors; and/or
- an external dispute resolution scheme of which we are a member; and/or
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney); and/or
- where permitted by law, debt collection agencies; and/or
- CRBs - see below; and/or
- as otherwise permitted by law.

We only disclose your credit information and credit eligibility information as permitted by the Act and the Code.

Do we disclose Credit Information and Credit Eligibility Information outside of Australia?

We may disclose your credit information and credit eligibility information to entities outside of Australia. We use service providers located outside of Australia to perform functions on our behalf.

The entities we may share your credit-related information with may be located in, or have personnel that access your information from, the following jurisdictions: New Zealand.

We only disclose your information to entities outside of Australia for our business functions or for the purposes of providing services to you.

Where we do so, we ensure that the disclosure of and access to that information is secure and appropriate controls are in place, and we take reasonable steps to ensure that any overseas recipients of your information handle it in a manner consistent with the Privacy Act.

Credit Reporting Bodies and your Credit Information

CRBs are permitted under the Act and the Code to use and disclose your credit information. If you apply for commercial credit or offer to act as a guarantor, we may disclose your credit information to, or collect credit information about you from, a CRB. This information is used for the purpose of determining your eligibility for credit, and we may process the information to assess your creditworthiness and suitability

for credit. As indicated above, we may also disclose credit information to a CRB in instances where you fail to meet your payment requirements and you commit a serious credit infringement.

What CRBs do we deal with?

The CRB we deal with is Equifax. You can contact them using the details below:

Equifax Public Access

PO Box 964 North Sydney NSW 2059
138 332
customercomplaintsAU@equifax.com

You may obtain a copy of Equifax's policy about their management of credit-related information by contacting them or visiting their website www.equifax.com.au.

CRBs and Fraud

You have a right to request that a CRB not use or disclose your credit-related information if you believe, on reasonable grounds, that you have been or are likely to be a victim of fraud.

Pre-screening and CRBs

CRBs offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called "credit pre-screening". You have the right to request CRBs do not use your credit information for this purpose. To opt out of credit pre-screening, contact the CRB, using the contact details provided above.

Access and Correction of your Credit Information

You may request access to the credit information and credit eligibility information that we hold about you. We may be able to provide you with access to this information in a manner that you request if this is reasonable and practicable.

You may request us to correct the credit information and credit eligibility information held in relation to you if you believe that it is inaccurate, out of date, incomplete, irrelevant or misleading. With any request that is made we will need to authenticate your identity to ensure the correct person is requesting the information.

You may make an access or correction request at any time by contacting our Australian Privacy Officer on +61 (0)7 3260 9777 or sending an email to FBPrivacyAU@fbu.com.

We will endeavour to respond to your request within a reasonable time period and as soon as practicable in a manner as requested by you. We will normally respond within 30 days.

We will not charge you for making an access request.

If we do not agree to provide access or make the requested changes to your credit information and credit eligibility information, we will notify you of this in writing, providing our reasons for the refusal.

If you are not satisfied with our response to your access or correction request, you can make a complaint to the to the Office of the Australian Information Commissioner. For contact details, please see www.oaic.gov.au. Please see our Complaints section below for information on making a complaint.

To ensure that you have access to the most up to date credit information about you, you should also request access to credit reporting information about you held by the CRBs listed above.

Complaints

You have the right to make a complaint if you believe that we have not complied with our obligations

under the Act and the Code. Should you have a complaint, we encourage you to inform us so that we can have the opportunity to remedy the issue and find a solution. You can do this by contacting us in writing using the contact details listed below.

If you make a complaint, we will:

- acknowledge your complaint in writing as soon as practicable and usually within 10 days of us receiving the complaint;
- investigate the complaint; and
- endeavour to respond to your complaint and attempt to resolve the issues within 30 days.

If we consider that it is necessary to consult a credit reporting body or another credit provider about the complaint, we will do so.

After investigating your complaint, we will make a decision about the complaint and give you a written notice that:

- sets out the decision; and
- states that, if you are not satisfied with the decision, you may make a complaint to the Office of the Australian Information Commissioner, within 30 days commencing on the day on which your complaint is made. For more information about making a complaint to the OAIC, visit www.oaic.gov.au/privacy/privacy-complaints/

If you are not satisfied with the handling of your complaint, you may complain to the OAIC.

Changes to the Credit Reporting Policy

We may, at our discretion, change our approach to the handling of credit information and will, in such instances, update the Credit Reporting Policy to reflect these changes. The most up-to-date copy of the Credit Reporting Policy will be available on our website.

This document is effective and up to date as at 9 November 2023.