

CVS Lane Capital Partners Pty Ltd

Credit Information Policy

1 Introduction

CVS Lane Capital Partners Pty Ltd (ABN 81 155 490 154 and AFSL 421125) and its related bodies corporate (collectively, **CVS Lane, we, us** or **our**) is a provider of funds management, investment and property finance services.

In providing our services, CVS Lane may collect credit information and credit eligibility information about individuals. This credit information and credit eligibility information may include information about applications you make to us for credit, information about credit accounts you have with us and information about you that we obtain from Credit Reporting Bodies (**CRBs**).

In handling your credit information and credit eligibility information, we are required to comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Privacy (Credit Reporting) Code (**CR Code**).

This Credit Information Policy sets out the policy of CVS Lane in relation to the management of credit information and credit eligibility information.

Further information about how we collect, hold, use, disclose and manage your personal information (which may include your credit information) is set out in our Privacy Policy, which is accessible at www.cvslane.com.au or by contacting us and requesting a copy.

2 What type of credit information do we collect?

We may collect, hold and disclose the types of credit information and credit eligibility information (referred to collectively in this policy as **credit information**) described below.

Credit information includes information about your credit worthiness, credit standing and repayments history or credit capacity that we are allowed to exchange with CRBs by law. Credit eligibility information includes information provided to us by a CRB.

Generally, the type of credit information we collect may include:

- that you have applied for credit with us or other credit providers and the amount of credit required;
- that we or another credit provider are a current credit provider to you and the type, characteristics and amount of credit provided to you;
- information regarding the fact we have accessed your consumer credit information to assess an application for credit;
- whether you have met, or failed to meet, your repayment obligations under credit provided by us or other credit providers;
- details of you defaulting on repayment (ie a repayment that is at least 60 days overdue and over \$150 in value), provided we have notified you in accordance with the law;
- information regarding any amount you have paid that was previously reported as being in default;
- information regarding our belief, on reasonable grounds, or the belief of another credit provider, that you have committed a serious credit infringement;
- information regarding whether you have entered into an arrangement with us or another credit provider in relation to credit provided to you by us or the other credit provider;
- details of credit provided to you, by us or another credit provider, being paid or otherwise terminated (including the date of payout or termination);

- personal insolvency information, court records, public notices or other publically available information about you;
- information that is provided to us by a CRB, such as credit scores, assessments or records; and
- information that is derived by us from information provided by a CRB to us, such as internally generated credit scores, assessments, summaries or evaluations.

3 How do we collect credit information?

Generally, we collect credit information as follows:

- by collecting the information you or from someone acting on your behalf (such as when you submit information to us as part of our credit application or assessment processes);
- by collecting the information from CRBs or other credit providers;
- by collecting the information from publically available sources; and
- by collecting or deriving the information from CVS Lane's records or from information held or obtained by CVS Lane.

4 Why do we need your credit information?

CVS Lane collects, holds, uses and discloses your credit information for the purposes of providing and administering the loans and other finance or credit products and services offered or provided by us, including to:

- assess any application by you for commercial credit;
- assess any application by a company or other entity of which you are a director, public officer or are otherwise involved (**Associated Entity**) for commercial credit;
- assess any application by you to be a guarantor of credit granted, or proposed to be granted, by us to another (including to an Associated Entity);
- make decisions about whether to provide you or an Associated Entity with credit;
- provide you or an Associated Entity with commercial credit;
- manage credit or other products or services we provide to you or an Associated Entity from time to time;
- undertake identification and verification processes in accordance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) or any other relevant laws;
- undertake securitisation activities in respect of credit we provide to you or an Associated Entity;
- collect or seek to collect payments that are overdue in relation to credit provided to you or in respect of which you are a guarantor;
- assist or seek to assist you or an Associated Entity to avoid defaulting on repayment obligations;
- inform you or an Associated Entity of finance products and arrangements that may be of interest to you or an Associated Entity; and
- undertake other activities as required by law.

5 Disclosure to CRBs

We may disclose credit information to CRBs (subject always to our obligations under the Privacy Act). The information we may disclose to CRBs includes:

- that you have applied for credit with us and the amount of credit required;
- that we are a current credit provider to you;
- whether you have met, or failed to meet, your repayment obligations;
- whether you have committed a serious credit infringement;
- details of your defaulting on a repayment (ie a repayment that is at least 60 days overdue and over \$150 in value) provided we have notified you in accordance with the law;
- whether you have paid any amount previously reported as being in default;
- our belief, on reasonable grounds, that you have committed a serious credit infringement; and
- details of credit that we have provided to you being paid or otherwise terminated.

In particular, we may disclose credit information to Veda Advantage Information Services and Solutions Limited (**Veda**), who are a CRB. Veda's policy on its management of credit-related personal information can be accessed through its [website](#). Veda can otherwise be contacted on the following details:

Veda, PO Box 964 North Sydney 2059, www.mycreditfile.com.au, 1300 762 207

Veda (or any other CRB to whom we disclose your credit information) may include any of your personal information disclosed by us in reports it provides to other credit providers for the purpose of such credit providers assessing your credit worthiness.

6 Other disclosures

In addition to disclosure to a CRB as described in paragraph 5 above, we may, for the purposes set out in this Credit Information Policy (or as required or permitted by law) disclose your credit information to:

- other credit providers;
- other third parties where reasonably necessary for assessing, providing or administering your application for credit or assessing whether to accept you as a guarantor;
- a guarantor, or prospective guarantor of any credit provided or proposed to be provided by us to you or an Associated Entity. Such disclosures may include the disclosure of credit related personal information regarding you to such guarantor or prospective guarantor;
- our related bodies corporate;
- our third party services providers including our banks or any other parties who may provide financing or securitisation services in relation to credit we provide to you; and
- other entities that may wish to acquire, or have acquired, an interest in our business, the benefit of any contracts entered into by us or any rights under an account or agreement you have entered into with us.

7 Overseas disclosure

We do not disclose your credit information to recipients located overseas (ie outside of Australian borders).

If in the future, we decide to disclose credit information to an overseas recipient, we will update this credit information policy regarding the likely disclosures (including, if it is practical to do so, the countries in which such overseas recipients are likely to be located).

8 Direct marketing

We do not use or disclose your credit information for direct marketing purposes.

CRB's can generally use credit information to assist a credit provider to market to you by pre-screening you for direct marketing by the credit provider. If you do not want a CRB to use your information for the purpose of pre-screening, you have the right under the Privacy Act to request that the CRB exclude you from pre-screening. You can do this by contacting the relevant CRB directly.

9 Security of your credit information

CVS Lane takes steps reasonable in the circumstances to ensure that the credit information we hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We store credit information in different ways, including paper and electronic form.

Credit information is held on secured servers or in storage located in controlled, access restricted environments. Our employees are obligated to maintain the confidentiality of any credit information held by us.

Credit information may also, in certain circumstances, be held on behalf of CVS Lane in hard copy or electronic forms by CVS Lane's service providers (such as offsite document storage providers or electronic data storage providers). CVS Lane enters into agreements with such service providers which impose confidentiality and privacy obligations on the service provider.

CVS Lane will destroy or de-identify credit information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

If you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud, you may request Veda not to use or disclose credit-related personal information it holds about you by contacting Veda on the details set out in paragraph 5 of this credit information policy.

10 Correcting, accessing or updating your personal information

CVS Lane takes steps reasonable in the circumstances to ensure credit information it holds is accurate, up-to-date, complete, relevant and not misleading.

You have a right to request access to, and seek correction of, the credit information CVS Lane holds about you. All such requests can be made using the contact details set out below.

Where necessary to respond to a request for correction, CVS Lane may consult with other relevant entities including, but not limited to, CRB's and other credit providers.

Alternatively, if you would like to access or correct credit information held about you by a CRB, please contact the relevant CRB directly.

CVS Lane will endeavour to respond to your request to access or correct your credit information within 30 days of your request.

If CVS Lane refuses your request to access or correct your credit information, CVS Lane will provide you with written reasons for the refusal and details of complaint mechanisms available to you.

If you are dissatisfied with CVS Lane's refusal to grant access to, or correction of, your credit information, you may make a complaint to the Office of the Australian Information Commissioner.

You can make a request to access, correct or update your personal information held by us by contacting our Privacy Officer using the following contact details.

The Privacy Officer
CVS Lane Capital Partners Pty Ltd
Level 9 South, 161 Collins Street
Melbourne Victoria 3000
Phone: 03 9016 7233
Email: info@cvslane.com.au

11 Notification and changes

We regularly review our practices and procedures regarding how we collect, hold, use, disclose and otherwise manage credit information.

As a result, this credit information policy may be updated from time to time. Where we update this credit information policy we will make the updated policy available, including on our website. For questions about this credit information policy, or any dealings with CVS Lane, please contact our Privacy Officer.

12 Complaints

If you believe CVS Lane has not dealt with your credit information in a manner that complies with the Privacy Act or the CR Code, you should contact CVS Lane using the contact details set out in this credit information policy.

You may be required to put your complaint in writing to CVS Lane.

CVS Lane:

- will acknowledge your complaint within 7 days of receipt and aim to resolve it within 30 days;
- may consult with relevant third parties, such as CRB's or other credit providers, in order to sufficiently and expeditiously resolve your complaint; and
- will treat your complaint seriously, promptly and confidentially.

A complaint will not affect existing obligations or the commercial arrangements between you and CVS Lane.

If your complaint relates to CVS Lane's refusal to provide access to, or correction of, your credit information, or if you are dissatisfied with the outcome of your complaint, you may complain to the Office of the Australian Information Commissioner.

NOTIFIABLE MATTERS

CVS Lane Capital Partners Pty Ltd and its related bodies corporate (collectively **CVS Lane, we, us, our**) are required by law to notify you of the following matters in relation to the credit related personal information about you that we collect, hold, use, disclose and manage:

- (a) CVS Lane is likely to disclose personal information about you to the credit reporting body Veda Advantage Information Services and Solutions Limited (**Veda**). The contact details for Veda are PO Box 964 North Sydney, 2059, www.mycreditfile.com.au, 1300 762 207.
- (b) Veda may include the personal information about you that CVS Lane discloses to Veda in reports provided to other credit providers to assist them to assess your credit worthiness.
- (c) If you fail to meet payment obligations in relation to consumer credit or commit a serious credit infringement, CVS Lane (or another credit provider) may be entitled to disclose this to Veda.
- (d) You can obtain CVS Lane's written policy about the management of credit-related personal information (known as our Credit Information Policy) at www.cvslane.com.au or by contacting CVS Lane and requesting a copy.
- (e) Veda's policy on its management of credit-related personal information can be accessed through its website (www.veda.com.au).
- (f) You have a right to request access to, and seek correction of, the credit information CVS Lane holds about you. You also have the right to make a complaint to CVS Lane if you consider that CVS Lane has breached its obligations under the Privacy Act 1988 (Cth) or the CR Code in relation to that information. Further details regarding how to seek access to or correction of credit information or how to make a complaint to CVS Lane are set out in the Credit Information Policy.
- (g) Veda and other credit reporting bodies can generally use credit reporting information to assist a credit provider to market to you by pre-screening you for direct marketing by the credit provider. You have a right to request Veda (or any other relevant credit reporting body) not to use your credit reporting information for the purposes of pre-screening of direct marketing by a credit provider. You can contact Veda or any other relevant credit reporting body directly to make such request.
- (h) You have the right to request Veda or any other relevant credit reporting body not to 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. You can contact Veda or any other relevant credit reporting body directly to make such request.

If you would like to find out more information about the CVS Lane Privacy Policy, the CVS Lane Credit Information Policy or if you would like a copy of our Notifiable Matters in hard copy form, please contact our Privacy Officer:

The Privacy Officer
CVS Lane Capital Partners Pty Ltd
Level 9 South, 161 Collins Street
Melbourne Victoria 3000
Phone: 03 9016 7233
Email: info@cvslane.com.au