



CVS Lane Capital Partners Pty Ltd Credit Information Policy

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1 Introduction

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

In providing its products and 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 CVS Lane for credit, information about credit accounts you have with CVS Lane and information about you that CVS Lane obtains from Credit Reporting Bodies (CRBs).

In handling your credit information and credit eligibility information, CVS Lane will comply with the Privacy Act 1988 (Cth) (Privacy Act) and the Privacy (Credit Reporting) Code (CR Code).

This policy sets out how CVS Lane aims to protect the privacy of your credit information and credit eligibility information, your rights in relation to credit information managed by CVS Lane, and the way CVS Lane collects, holds, uses and discloses your credit information.

Further information about how CVS Lane collects, holds, uses, discloses and manages your personal information (which may include your credit information) is set out in CVS Lane's Privacy Policy, which is accessible at www.cvslane.com.au or by contacting CVS Lane and requesting a copy.

This policy may be updated from time to time.

2 What kinds of credit information does CVS Lane collect?

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

Generally, the kinds of credit information and credit eligibility information (referred to collectively in this policy as **credit information**) that CVS Lane collects may include:

- information about the types of credit you have applied for with CVS Lane or other credit providers, and the amount of credit required;
- information regarding the fact CVS Lane has accessed your consumer credit information to assess an application for credit;
- information about whether you have met, or failed to meet, your repayment obligations under credit provided by CVS Lane or other credit providers;
- details of you defaulting on repayment (i.e. a repayment that is at least 60 days overdue and over \$150 in value), provided CVS Lane has notified you in accordance with the law;
- information regarding any amount you have paid that was previously reported as being in default;

- information regarding CVS Lane's 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 CVS Lane or another credit provider in relation to credit provided to you by CVS Lane or the other credit provider;
- details of credit provided to you, by CVS Lane 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 publicly available information about you;
- information that is provided to CVS Lane by a CRB, such as credit scores, assessments or records;
- information that is derived by CVS Lane from information provided by a CRB to it, such as internally generated credit scores, assessments, summaries or evaluations; and
- any other information lawfully obtainable within the Australian credit reporting system.

3 How does CVS Lane collect credit information?

Generally, CVS Lane collects credit information as follows:

- by collecting the information from you or from someone acting on your behalf (such as when you submit information to CVS Lane as part of its credit application or assessment processes);
- by collecting the information from CRBs (such as Equifax, the details of which are set out in paragraph 5 below) or other credit providers;
- by collecting the information from publicly 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 does CVS Lane 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 CVS Lane, 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 CVS Lane 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 CVS Lane provides 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 CVS Lane provides 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.

CVS Lane may also use your credit information where you have consented or the use is otherwise in accordance with law.

5 Disclosure to CRBs

CVS Lane may disclose credit information to CRBs (subject always to its obligations under the Privacy Act). The information CVS Lane may disclose to CRBs includes:

- that you have applied for credit with CVS Lane and the amount of credit required;
- that CVS Lane is 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 CVS Lane has notified you in accordance with the law;
- whether you have paid any amount previously reported as being in default;
- CVS Lane's belief, on reasonable grounds, that you have committed a serious credit infringement; and
- details of credit that CVS Lane has provided to you being paid or otherwise terminated.

In particular, we may disclose your credit information to Equifax, who is a CRB. Equifax can be contacted via its website at: <https://www.equifax.com.au/contact>. Equifax's policy on its management of credit-related information can be accessed through its website at: <https://www.equifax.com.au/credit-reporting-policy>

Equifax (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, CVS Lane may, for the purposes set out in this 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 CVS Lane 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;
- CVS Lane's professional advisors, business partners, contractors, suppliers, and consultants;
- CVS Lane's third party services providers, including its banks or any other parties who may provide financing or securitisation services in relation to credit CVS Lane provides to you;
- people or entities considering acquiring an interest in CVS Lane's business, the benefit of any contracts entered into by CVS Lane or any rights under an account or agreement you have entered into with CVS Lane; and
- regulatory bodies.

7 Overseas disclosure

In some circumstances, CVS Lane may disclose credit information to overseas recipients (including but not limited to recipients in the United States, Singapore, United Kingdom and European Union) to provide its products and/or services and for administrative or other business management purposes.

Overseas recipients may have different privacy and data protection standards. However, before disclosing any credit information to an overseas recipient, CVS Lane takes steps reasonable in the circumstances to ensure the overseas recipient complies with reasonable data protection standards and complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme, unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

The types of organisations CVS Lane may disclose your credit information to include:

- prospective funders or other intermediaries in relation to any finance requirements you have;
- underwriters CVS Lane may use in relation to its financial products and services;
- third parties who provide services to you relevant to your investment in CVS Lane funds or other financial products or services (where you request us to make such disclosure);
- government authorities were required to by law, such as under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*;

- third party service providers CVS Lane engages to assist us in providing CVS Lane funds management services or other financial products or services including such service providers we may engage to provide custody, administration, identity verification, technology, auditing, mailing, printing or other relevant services;
- related bodies corporate of CVS Lane (such as subsidiaries or holding companies of CVS Lane) or other third parties that CVS Lane has a commercial arrangement with, for the purpose of advising you of special offers or promotions or otherwise notifying you of other products or services that we believe may be of interest to you;
- our professional advisors (including legal, financial or insurance advisors); and
- any entity that acquires CVS Lane business or assets or any entity that may wish to acquire, or has acquired, an interest in CVS Lane business, the benefit of any contracts entered into by us or any rights under an account or agreement you have entered into with us.

If you have any queries or objections to such disclosures, please contact CVS Lane Privacy Officer on the details set out in paragraph 10.

8 Direct marketing

CVS Lane will not use or disclose your credit information to inform you of other products and services or for other direct marketing purposes.

9 Security of your credit information

CVS Lane takes steps reasonable in the circumstances to ensure that the credit information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. CVS Lane holds credit information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

CVS Lane employees are obligated to maintain the confidentiality of credit information held by it.

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 CVS Lane is 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 that CRBs, such as Equifax, not use or disclose credit-related information they hold about you by contacting them directly (you can contact Equifax on the details set out in paragraph 5 of this policy).

10 Correcting, accessing or updating the credit information that CVS Lane holds

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.

To obtain access to, or to correct, your credit information:

- (a) you will have to provide proof of identity to ensure that credit information is provided only to the correct individuals and that the privacy of others is protected;
- (b) CVS Lane requests that you be reasonably specific about the credit information you want to access or correct; and
- (c) CVS Lane may charge you a reasonable administration fee, which reflects the cost to CVS Lane for providing access in accordance with your request.

Where necessary to respond to a request for correction, CVS Lane may consult with other relevant entities including, but not limited to, CRBs 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.

CVS Lane will grant access to the extent required and take steps reasonable in the circumstances to correct credit information where necessary and appropriate.

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 correct, 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 credit information held by us by contacting our Privacy Officer using the following contact details.

The Privacy Officer
CVS Lane Capital Partners Pty Ltd
Level 32, 120 Collins Street
Melbourne Victoria 3000
Phone: 03 9016 7233
Email: info@cvslane.com.au

11 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 policy. Please direct all privacy complaints to CVS Lane's Privacy Officer.

At all times, privacy complaints will:

- be treated seriously;
- be dealt with promptly;
- be dealt with in a confidential manner; and
- not affect your existing obligations or affect the commercial arrangements between you and CVS Lane.

CVS Lane:

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

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.

12 Notifiable Matters

CVS Lane Capital Partners Pty Ltd and its related bodies corporate (collectively CVS Lane) 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:

- CVS Lane is likely to collect from, and disclose to, the credit reporting body Equifax personal information (including credit information) about you. Equifax can be contacted via its website at: <https://www.equifax.com.au/contact>.
- Equifax may include the personal information (including credit information) about you that CVS Lane discloses to Equifax in reports provided to other credit providers to assist them to assess your credit worthiness.
- 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 Equifax.
- 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.
- Equifax's policy on its management of credit-related personal information can be accessed through its website (www.equifax.com.au).
- 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.
- Equifax 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 Equifax (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 Equifax or any other relevant credit reporting body directly to make such request.
- You have the right to request Equifax 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 Equifax 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 32, 120 Collins St
Melbourne Victoria 3000
Phone: 03 9016 7233
Email: info@cvslane.com.au

This policy was last reviewed in December 2022.