

## P4 Finance Credit Reporting Policy

### Introduction

This Credit Reporting Policy ("Policy") explains how P4 Finance Pty Ltd ACN 151 234 605 ("P4 Finance", referred to in this Policy as "we" "our" or "us") collects, uses, discloses and otherwise manages your credit-related personal information. We recognise that your privacy is very important and we are committed to protecting the personal information we collect from you.

In particular, our handling of credit-related personal information is regulated by privacy laws including credit reporting requirements. This includes under the *Privacy Act 1988 (Cth)* ("Privacy Act"), Australian Privacy Principles and registered privacy codes (including the Privacy (Credit Reporting) Code 2014 ("Code"))

If you would like to request a copy of this Policy in another form, please contact us at the details below.

This policy only applies to our handling of credit-related personal information. For details of how we collect, hold, use and disclose personal information that is not credit-related, please refer to our Privacy Policy at:

<http://www.p4finance.com/sites/p4finance.com/files/P4-Privacy-Policy.pdf>

### 1. What is personal information?

Personal information is information or an opinion, in any form (whether true or not), about an identified individual or an individual who is reasonably identifiable.

### 2. What is credit-related personal information?

For the purposes of this Policy, "credit-related personal information" is personal information about you that may have a bearing on credit that has been provided to you or that you have applied for. This includes credit for personal, domestic or household purposes and credit in connection with a business (such as investment loans provided by P4 Finance). It can also cover information about you as a guarantor of a loan or as an insured party under a credit related insurance policy.

### 3. Collection of your credit-related personal information

P4 Finance may collect, use and disclose the following types of credit-related personal information about you, being a Flight Centre Manager, 99 Bikes Manager or Pedal Group Manager (or any individuals connected with any such managers), as permitted under privacy laws including credit reporting requirements:

- contact and identification information, such as your name, address, phone number, email address and similar information;
- detailed personal information such as your date of birth, driver licence number and other identification information or documents;
- financial information, such as your sources of income and other sources of wealth, assets, financial relationships and financial transactions you are a party to;
- information about your past experiences with us and other credit providers, such as the kinds of credit products you have had or sought and how you have managed your obligations (eg, repayment history), and other information about your financial position and personal circumstances. This includes:
  - default information about you (eg, payments that remain overdue for more than the regulated period applying in your jurisdiction);

- payment information about you (eg, information that an overdue defaulted payment has been repaid); and
- personal insolvency information about you (eg, insolvency related information recorded in the National Personal Insolvency Index);
- publicly available information about you that relates to your credit worthiness; and
- any other credit-related personal information which you provide to us or others provide to us on your behalf.

We collect credit-related personal information about you in various ways including when you provide such information directly to us (such as when you complete a loan application under the Flight Centre Travel Group Business Ownership Scheme, the Pedal Group Business Ownership Scheme or the 99 Bikes Business Ownership Scheme, each a "**Business Ownership Scheme**") or where provided by credit reporting bodies ("**CRBs**"), our service providers (eg, identity verification providers), our affiliates and related companies, and other third parties, or publicly or commercially available sources. Your credit-related personal information is stored in physical and electronic form and protected by procedural and technical security safeguards.

#### **4. Why do we collect, hold, use and disclose your credit-related personal information?**

The credit-related personal information P4 collects from you or about you is necessary for our business and we collect, use, hold and disclose it for purposes permitted under privacy laws including credit reporting requirements, including to:

- verify your identity;
- assess your, or your organisation's, application for credit and establishing and administering your, or your organisation's, credit account;
- assessing your or other persons suitability as a guarantor;
- conduct appropriate checks for credit-worthiness and obtain credit reports from CRBs (including through a consumer and/or commercial credit report from a CRB) to assess an application(s) for credit;
- provide you with products, services and/or credit you, or your organisation, has requested;
- administer and manage our relationship with you including to collect overdue payments;
- exercise any of our powers or performing our obligations under personal property securities legislation, such as registering security interests;
- use for our internal operations including record keeping, risk management and analysis, complaints handling, planning and quality assurance and audit purposes;
- participate in the credit reporting system (more details below);
- give any report, copy of any agreements or other documents or information about you to any person or entity which has or will guarantee, or provide security for, the repayment of credit provided to you or your organisation; and
- use as required, authorized or prescribed by relevant laws and regulations.

We may also share it with other as described in our Privacy Policy available at <http://www.p4finance.com/sites/p4finance.com/files/P4-Privacy-Policy.pdf>.

Please note that if you we are unable to access to your credit-related personal information, we may not be able to provide you services including to provide you a loan (as relevant).

## 5. Information disclosed to third parties

### Disclosure to Credit Reporting Bodies

From time to time, P4 Finance may disclose your credit-related personal information to CRBs for purposes permitted under privacy laws including credit reporting requirements. For example if you fail to meet your payment obligations in relation to credit provided by us or if you commit a serious credit infringement, we may disclose such information to a CRB.

You should be aware that a CRB may use your credit-related personal information provided by us to create a credit score for you, or your organisation, and may include the information provided by us in reports provided by the CRB to other credit providers to assist them to assess your credit worthiness.

You have special rights under privacy laws including credit reporting requirements in relation to dealings with CRBs, such as:

- you may request from a CRB its policy on how it manages your personal information;
- CRBs can use your credit-related personal information for a pre-screening assessment at the request of a credit provider unless you ask the CRB to exclude you; and
- if you reasonably believe that you have been or are likely to be a victim of fraud including identity-related fraud, you can request the CRB not to use or disclose credit-related personal information the CRB holds about you.

The CRB we currently deal with is Equifax Australia Pty Ltd ("**Equifax**"). Please go to [www.mycreditfile.com.au](http://www.mycreditfile.com.au) for Equifax's privacy policy with its contact details and information about how Equifax manages your credit-related personal information.

### Disclosure to other recipients

P4 Finance may also disclose your credit-related personal information to third parties as permitted under privacy laws including credit reporting requirements, such as:

- other credit providers;
- our affiliates and related companies;
- our service providers, external advisers, agents, contractors and other organisations involved in the provision or support of the credit we provide, or offer to provide, to you;
- government and other regulatory bodies, law enforcement bodies and courts; and
- external complaint resolution bodies.

The recipients to which we disclose your credit-related personal information may be located in Australia, It may be necessary for us to forward personal information to relevant overseas third party service providers from time to time as set out above. If, at any time, it becomes practicable for us to specify which countries such third parties are likely to be located in we will update this Policy. This includes for the purpose of storing (including electronically) and use of your credit-related personal information.

We may also disclose your credit information to others where:

- we are required or authorised by law or where we have a public duty to do so;
- you have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

## 6. Access, updating and requesting correction of credit-related personal information

We try hard to make sure that information about you is accurate and up to date when we collect or use it.

If you would like to seek access or correction of your personal information please contact us using the contact details below. A copy of requested information will usually be made available to you within 14 days.

We will generally provide access and make relevant changes unless there is a valid reason for us not doing so. If we deny access or refuse to make a change, we will provide you with the reason for such denial. We will only refuse requests in circumstances that are permitted by law.

While there is no charge for making a request, we may recover from you our reasonable costs of supplying you with access to information. No charges are imposed for correcting information.

### Contact Details:

If you wish to obtain access to and/or correct your credit-related personal information held by us, please contact P4 Finance:

Email: [p4finance@flightcentre.com](mailto:p4finance@flightcentre.com)

Mail: The Privacy Officer

P4 Finance Pty Ltd

275 Grey Street

South Brisbane QLD 4101

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## 7. Feedback / Complaints

We welcome your inquiries or comments about our Policy. Should you have any comments or complaints about how we handle your personal information, please contact P4 Finance at [p4finance@flightcentre.com](mailto:p4finance@flightcentre.com).

In most cases we will ask that you put any complaint in writing to us. We will investigate your complaint and will use reasonable endeavours to respond to you in writing within 30 days of receiving the written complaint.

We may consult with a CRB or another credit provider if we consider it necessary to deal with your complaint. If we disclose your credit-related personal information while investigating your complaint, we may also advise the recipient about your complaint.

If we fail to respond to your complaint within that timeframe, or if you are dissatisfied with the response that you receive from us, you may also contact:

- the Australian Financial Complaints Authority ("AFCA"), who can consider most privacy complaints involving providers of financial services. AFCA can be contacted at: Australian Financial Complaints Authority, GPO Box 3 Melbourne VIC 3001, Phone: 1800 931 678 or through their website: [www.afca.org.au](http://www.afca.org.au)
- the Office of the Australian Information Commissioner (OAIC). Contact details for the OAIC are available at [www.oaic.gov.au](http://www.oaic.gov.au).

## 8. Changes to our Policy

From time to time it may be necessary for us to review and revise this Policy including to take into account new laws, regulations and technology. We reserve the right to change our Policy at any time; and should this occur the amendment will be posted on P4 Finance's website.