

RetPro

Credit Information Management Policy

1 Credit Information Management Policy

RetPro Pty Ltd ACN 140 217 796 and all our related entities including but not limited to RetPro Advisory Pty Ltd ACN 619 806 763 and RetPro Management Pty Ltd ACN 155 736 771 (collectively, **RetPro, us, we, our**) is committed to protecting the privacy of your credit information and credit eligibility information (collectively referred to as "credit data" in this Credit Information Management Policy). This Credit Information Management Policy explains how RetPro handles such credit data.

From time to time, RetPro may in the course of assessing applications for credit, in our capacity as agents of landlords of prospective tenants, as part of liaising with other property managers, or as part of our engagement to advise on the asset management of properties with commercial tenants that you are involved with, collect credit data about individuals (for example, this may occur if an individual carries on business as a sole trader, or if a personal guarantee is provided in support of a credit application), or we may collect credit data incidentally as part of the specialist retail property services we provide.

Generally speaking, credit data is information used to assess an individual's eligibility to be provided with credit. It may include details of credit provided to you, repayment history information, and certain details regarding overdue payments or defaults.

Credit data is a specific kind of "personal information" (which is essentially information or an opinion about you as an identified or reasonably identifiable individual). RetPro's Privacy Policy applies to RetPro's handling of personal information generally (available at www.RetProgroup.com.au). Unless otherwise stated, this Credit Information Management Policy applies instead of RetPro's Privacy Policy where we handle credit data.

2 Collection of credit data

The kinds of credit data that RetPro collects and holds may include:

- identification information (which may include your full name, previous name, alias, date of birth, gender, current and last known address and two previous addresses, the name of your current or last known employer, and driver's licence number);
- a copy of documents that include such identification information (such as your driver's licence, birth certificate or passport);
- consumer credit liability information (which may include information about existing credit provided to you such as the name of the credit provider, whether the credit provider is a licensee, the type of credit, when it was provided, the terms and conditions that apply, the maximum amount of credit available, and the day on which the credit was terminated);
- repayment history information (which may include whether or not you have made a payment on time, when it was due and when it was paid);
- confirmation of previous information requests to credit reporting bodies made by other credit providers and insurers;
- details of previous applications for credit made by you;
- default information (which relates to certain overdue payments);
- payment information (which relates to when such overdue payments were made);

- court proceedings information (which relates to court judgments about credit provided to you);
- personal insolvency information (for example, if you are declared bankrupt);
- publicly available information relating to your credit worthiness; and
- any credit score or risk assessment setting out a credit reporting body's or credit provider's opinion of your eligibility for credit.

RetPro usually derives, from credit data disclosed to RetPro by a credit reporting body (such as Equifax), information that has a bearing on your credit worthiness including internal assessments, calculations and credit scores on your credit data for the purpose of assessing credit applications received by RetPro.

Credit information may be collected by RetPro:

- directly from you;
- from a credit reporting body (such as Equifax); and /or
- from other parties (for example, landlords, our clients and other credit providers) where permitted by the Privacy Act.

If you do not provide or agree to the collection of the credit data requested, we may be unable to assist any business you operate or represent (for example, we may not be able to approve any application such a business makes for credit facilities) or provide you or the business you represent with the products and services you seek.

3 Purposes

RetPro collects, holds, uses and discloses credit data in order to conduct our business, to provide our services (in our capacity as the agents for landlords and our clients) and to meet legislative and regulatory requirements. This generally involves, but is not limited to, collecting, holding, using and disclosing credit to:

- verify your identity and personal information;
- assess an individual's eligibility for credit and credit worthiness;
- investigate and deal with unlawful activity or misconduct;
- monitor and adjust credit limits for customers or revoke the provision of credit;
- administer individual's orders and accounts;
- facilitate collection of overdue accounts; and
- resolve complaints.

4 Disclosures

We may share your credit data with:

- the landlords we act on behalf of (in our capacity as their agents);
- our clients;
- our service providers and insurers;

- our professional advisors;
- debt purchasers;
- your guarantors, representatives and anyone else authorised by you;
- courts, tribunals and regulatory authorities; and
- any other person as required or permitted by law.

RetPro will not sell your credit data to any third parties. Depending on the particular services we have been engaged to perform, it may be necessary and we may disclose your credit data to recipients in New Zealand and a number of countries in the European Union. Otherwise, generally we will not disclose your credit data to overseas recipients, except with your consent or where we are required or authorised to do so by law.

5 Credit reporting bodies

Personal information provided by us to credit reporting bodies such as Equifax may be included in reports provided by credit reporting bodies to other credit providers, to assist them to assess your credit worthiness. We do not provide your credit information to entities without a link to Australia.

If an individual fails to meet its payment obligations or commits a serious credit infringement, we may be entitled to disclose this information to credit reporting bodies. A serious credit infringement includes:

- fraudulently obtaining credit;
- fraudulently evading (or attempting to evade) obligations in relation to credit; or
- an act that a reasonable person would consider indicates an intention to no longer comply with obligations in relation to credit.

You may contact a credit reporting body to request that it does not:

- use credit reporting information about you for the purpose of pre-screening of direct marketing by a credit provider; or
- 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 may obtain a credit reporting body's credit management policy by contacting them or online.

Details for the credit reporting bodies we may use are below:

- Equifax, www.equifax.com.au, PO Box 964, North Sydney, NSW 2059

6 Access to Credit Information

You may request access to your credit data held by RetPro by writing to us. RetPro will respond to your request within a reasonable period after your request is made.

For further information please refer to the relevant section of our Privacy Policy, which outlines the process that will apply should you request access to your personal information (which also applies to a request to access your credit data). Section 21T of the Privacy Act also outlines your rights to access your credit data in greater detail.

7 Correction

RetPro takes reasonable steps to ensure that the credit data we collect, use or disclose is accurate, up-to-date and complete.

If you believe any of your credit data held by RetPro is incorrect or out-of-date you may make a written request to RetPro seeking a correction. RetPro will respond within a reasonable period after your request is made.

For further information please refer to the relevant section of our Privacy Policy, which outlines the process that will apply should you request correction of your personal information (which also applies to the correction of your credit data). Sections 21U and 21W of the Privacy Act also outline your rights to correct your credit data in greater detail.

8 Storage of credit data

RetPro takes reasonable steps to store your credit data securely, and has policies and procedures intended to ensure that your credit data is not misplaced or misused, and that unauthorised access to, or modification or disclosure of, your credit data does not occur. Credit data may be held by us electronically or in hard copy form and we employ security protections appropriate for the form in which that information is held (e.g. passwords linked with authorised user access and physical document security).

9 Amendment

RetPro undertakes periodic review of our policies and procedures with guidance by our legal advisers to ensure that the credit data held is managed appropriately. We therefore reserve the right to amend this Credit Information Management Policy at any time. You may obtain a copy of the current version of this Credit Information Management Policy by contacting RetPro, or by accessing our website located at www.RetProgroup.com.au.

10 Complaints

If you believe that a breach of your privacy has occurred, we encourage you to contact RetPro to discuss your concerns.

Your complaint will be considered and dealt with by our Privacy Officer. If the breach is considered to be serious, the Privacy Officer may escalate the complaint internally within RetPro.

Please allow us a reasonable time to respond to your complaint.

Contact information

RetPro Management Pty Ltd
Attn: Privacy Officer
Level 4, Hanover House, 158 City Road, Southbank VIC 3006
Phone: +61 3 9693 7400
Email: privacy@RetProgroup.com.au