

HCF Credit Reporting Policy - Australia and New Zealand

1. Introduction

This HCF Credit Reporting Policy – Australia and New Zealand (**CR Policy**) applies if you are in Australia or New Zealand, and to each of the following entities:

- Huntington Commercial Finance, LLC (ARBN 637 017 273);
- Huntington Commercial Finance New Zealand Limited (NZBN 9429047576841); and
- Huntington Commercial Finance Australia Pty Ltd (ACN 633 966 613),

(one or more, or together, **HCF, we, us** or **our**), and details how we, as credit providers and service provider to credit providers, collect, use and disclose your credit-related personal information. Our handling of credit-related personal information is regulated by privacy laws including credit reporting requirements.

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

Throughout this CR Policy, we use the term **personal information** to describe information that is associated with a specific person and can be used to reasonably identify that person, either alone or in conjunction with any other information. Personal information does not include information that has been made anonymously and cannot reasonably identify a specific person.

Credit-related personal information is described below, but is generally personal information about you that may have a bearing on credit that has been provided to you or that you have applied for.

HCF is committed to respecting the privacy of your credit-related personal information and upholding the security of your credit-related personal information in our custody or control.

HCF may amend this CR Policy at any time. The updated version will be available at the '**HCF Credit Reporting Policy - Australia and New Zealand**' link on our website. The updated version will be effective from the time it is available on our website. We recommend you check the CR Policy regularly for changes.

2. Types of credit-related personal information

HCF may collect, use and disclose the following types of credit-related personal information about you, as permitted under privacy laws including credit reporting requirements:

- (a) Contact and identification information, such as your name, address, phone number, email address and similar information;
- (b) detailed personal information such as your date of birth, driver licence number and other identification information or documents;

- (c) financial information, such as your sources of income and other sources of wealth, assets, financial relationships and financial transactions you are a party to;
- (d) 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:
 - (i) default information about you (eg, payments that remain overdue for more than the regulated period applying in your jurisdiction);
 - (ii) payment information about you (eg, information that an overdue defaulted payment has been repaid); and
 - (iii) personal insolvency information about you (eg, insolvency related information recorded in the National Personal Insolvency Index);
- (e) publicly available information about you that relates to your credit worthiness; and
- (f) any other credit-related personal information which you provide to us or others provide to us on your behalf.

HCF collects credit-related personal information about you in various ways including when you provide such information directly to us (such as when you complete a credit application form) 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.

3. Driver licence

If we ask you to provide your driver licence, your provision of your driver licence number in doing so is voluntary. If you do provide us with your driver licence number, we may also ask you to provide us with the driver licence card number (if any). Both the driver licence number and driver licence card number may be provided by us to CRBs.

4. Purposes

The credit-related personal information HCF 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:

- (a) Verify your identity;
- (b) assess your, or your organisation's, application for credit and establishing and administering your, or your organisation's, credit account;
- (c) assessing any guarantor;
- (d) consider any other application made by you or your organisation to us for services to be provided on credit terms;

- (e) 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;
- (f) provide you with products, services and/or credit you, or your organisation, has requested;
- (g) administer and manage our products, services and credit, including charging, billing and collecting debts;
- (h) exercise any of our powers or performing our obligations under personal property securities legislation, such as registering security interests;
- (i) use for our internal operations including record keeping, risk management and analysis, complaints handling, planning and quality assurance and audit purposes;
- (j) undertake customer relations, including management of our relationship with you or your organisation and market or customer satisfaction research and product development;
- (k) make arrangements with other organisations to provide services in relation to our services;
- (l) participate in the credit reporting system (more details below);
- (m) 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
- (n) use as required, authorized or prescribed by relevant laws and regulations.

5. Disclosure to Credit Reporting Bodies

From time to time, HCF may disclose your credit-related personal information to CRBs for purposes permitted under privacy laws including credit reporting requirements. For example:

- (a) if you or your organisation requests credit from us or we assess you as a guarantor, we may check your identity and/or request a credit report about you from a CRB; and
- (b) 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:

- (a) you may request from a CRB, if you are in Australia, its policy on how it manages your personal information or, if you are in New Zealand, a summary

of your rights in relation to your credit-related personal information that the CRB holds;

- (b) CRBs can use your credit-related personal information for a pre-screening assessment at the request of a credit provider unless, if you are in Australia, you ask the CRB not to. If you do not want a CRB to use your credit-related personal information for the purpose of pre-screening and you are in Australia, you have the right to ask the CRB to exclude you; and
- (c) 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 CRBs we deal with are, if you are in Australia, illion Australia Pty Ltd and, if you are in New Zealand, illion New Zealand Ltd (**illion**). Please go to www.checkyourcredit.com.au for illion's privacy policy with its contact details and information about how illion manages your credit-related personal information.

6. Disclosure to other recipients

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

- (a) Other credit providers;
- (b) potential or current guarantors;
- (c) our affiliates and related companies;
- (d) our service providers, agents, contractors and other organisations involved in the provision or support of the credit we provide, or offer to provide, to you;
- (e) external advisers (for example, our valuers and lawyers);
- (f) government and other regulatory bodies, law enforcement bodies and courts; and
- (g) external complaint resolution bodies.

Note that the recipients to which we disclose your credit-related personal information may be located in Australia, New Zealand or the United States of America. This includes for the purpose of storing (including electronically) and use of your credit-related personal information. If in the future recipients are located outside Australia, New Zealand or the United States of America, we will update this CR Policy.

7. Accessing and requesting correction of credit-related personal information

We try hard to make sure that information about you is accurate when we collect or use it. Subject to some exceptions under privacy laws including credit reporting requirements, we will let you access the credit-related personal information we hold about you and correct it if it is inaccurate, incomplete or out-of-date. If we do not grant you access to your credit-related personal information or do not agree to correct your credit-related personal information we will tell you why.

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

Email: PrivacyAPAC@huntington.com

Mail: The Privacy Officer
Huntington Commercial Finance Australia Pty Ltd
PO Box 272
BOTANY NSW 2019
AUSTRALIA

Unless we do not agree to your request for access to credit-related personal information, in most cases HCF will provide you with access as soon as reasonably possible following receipt of your request. If you request corrections to your credit-related personal information and HCF agrees with your request, these changes will be made as soon as practicable. If HCF does not agree to your request for correction, it will notify you of the reasons it does not agree and will note your request on the records it holds about you.

8. Resolving your concerns about your credit-related personal information

If you have a complaint regarding HCF's management of your credit-related personal information or think we have failed to comply with privacy laws including credit reporting requirements, please prepare your complaint in writing and email or mail it to us using the contact details above.

Once a complaint has been lodged, the Privacy Officer will promptly respond to you to acknowledge receipt of your complaint. We will investigate your complaint and endeavour to respond within 20 business days, including advising you of the steps we have taken to resolve your 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 you are not satisfied with how we resolved your complaint, you may lodge a complaint with:

- (a) If you are in Australia, the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: enquiries@oaic.gov.au; or
- (b) if you are in New Zealand, the Office of the Privacy Commissioner by telephone: 0800 803 909 (Monday to Friday, 10:00 am to 3:00 pm).

9. HCF Privacy Policy - Australia and New Zealand

For details of how we collect, hold, use and disclose personal information that is not credit-related personal information, please refer to our Privacy Policy - Australia and New Zealand at the '**HCF Privacy Policy - Australia and New Zealand**' link on our website at <http://www.huntingtondf.com/aunz>.