

Credit Reporting Policy

Sydney Wyde Mortgage Management Limited

ABN 78 090 567 150
AFSL 245506; ACL 245506

1. Who are we?

- 1.1. This is the Credit Reporting Policy for Sydney Wyde Mortgage Management Limited ABN 78 090 567 150, Australian financial services licence and Australian credit licence No. 245506 and our related businesses including the *Sydney Wyde Mortgage Fund* ARSN 108 342 123 and *The CKM Mortgage Trust* ARSN 090 880 890 (**we, us or our**).
- 1.2. This Credit Reporting Policy applies to us in our capacity as responsible entity, administrator and manager of the registered schemes that we operate or to which we are a service provider, as well as in our personal capacity.

2. About this policy

- 2.1. This policy explains how we manage your credit information which we may acquire in the course of making a loan through one or other of our registered mortgage schemes. We may provide more details on how we manage your credit information when we collect your credit information. Our handling of credit information is regulated by the *Privacy Act 1988 (Cth)* (**Privacy Act**) and a code of conduct made pursuant to the Privacy Act to which we adhere called the *Privacy (Credit Reporting) Code (CR Code)*.

3. What is credit information?

- 3.1. Credit information is personal information that has 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. It can also cover information about you as a guarantor of a loan.

4. What kinds of credit information do we collect and hold, and how do we collect it?

- 4.1. If you apply for credit or give a guarantee, we may ask for identification information. This could include your name, address and date of birth. We may also collect information about your financial position for the purpose of assessing an application for credit and to assist in the ongoing management of the credit product or guarantee. This could include:
 - (1) your employment, income, expenses and savings; and
 - (2) your past experiences with us and other lenders - such as the kinds of credit products you have had or sought and how you have managed your obligations.
- 4.2. In addition, if you choose to make a hardship application in respect a credit contract or guarantee you have with us, we may seek other information about your personal circumstances relevant to that application.

- 4.3. Sometimes we collect credit information about you from other people. This may happen without your direct involvement. For instance, we may collect credit reports from credit reporting bodies or opinions from other lenders about your creditworthiness. We may also seek credit information about you from:
- (1) publicly available sources of information, such as public registers;
 - (2) your representatives (including your legal adviser, mortgage broker, financial adviser, or attorney);
 - (3) your employer;
 - (4) other organisations, who jointly with us, provide products or services to you; and
 - (5) commercial information service providers, such as companies that provide fraud prevention reports.

5. For what purposes do we collect, hold, use and disclose credit information?

- 5.1. The main reason we collect, use, hold and disclose credit information is to provide you with products and services. This includes:
- (1) checking whether you are eligible for the product or service;
 - (2) providing the product or service; and
 - (3) helping manage the product or service.
- 5.2. If you are offering to act as guarantor your credit information may be necessary to assess whether the borrower will be eligible for a loan if you act as guarantor.
- 5.3. We may also use your credit information for other purposes. For instance, to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and help us run our business.
- 5.4. We may also use your credit information to tell you about products or services we think may interest you, subject to legal restrictions on using this type of information for marketing purposes.

6. How do we hold credit information?

- 6.1. Much of the information we hold about you will be stored securely in paper files at our place of business and in commercial storage facilities. Information will also be stored electronically in secure data storage facilities.
- 6.2. We use a range of physical and electronic security measures, such as locks and passwords, to protect the security of the credit information we hold. We also train our employees to keep information secure.

7. To whom do we disclose your credit information and why?

- 7.1. The way we approve and manage credit involves a range of tasks. Some of these tasks are carried out for us by third party service providers, within Australia. In order to protect your credit information, we enter into contracts with those service providers that require them to comply with the Privacy Act. These contracts oblige them to restrict the use of credit information we disclose to them for the specific role we ask them to perform.

- 7.2. Generally, we disclose credit information to organisations that help us with our business. These may include:
- (1) our agents, contractors and external service providers (for example, mailing houses and technology service providers);
 - (2) other financial services organisations, including banks, and custodians;
 - (3) entities involved in our funding of loans (investors and their advisers);
 - (4) credit reporting bodies;
 - (5) organisations that provide us with insurance to cover our lending risks;
 - (6) our legal advisers and auditors;
 - (7) your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
 - (8) government agencies and dispute resolution schemes that assist consumers in relation to credit; and
 - (9) where permitted by law, debt collection agencies or other lenders, such as where you have given mortgage security over the same property to us and another lender.

7.3. We may also disclose your credit information to other entities where:

- (1) we are required or authorised by law or where we have a public duty to do so; or
- (2) you may 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.

7.4. As permitted under the Privacy Act, we may participate in repayment history reporting. When we receive a loan application, we may get information about whether the applicant has a history of making required repayments on time and whether any have been made after they are due. For all borrowers, we may periodically report the same information to credit reporting bodies.

8. Credit reporting bodies and your personal information – notifiable matters

- 8.1. Credit reporting bodies are allowed under the Privacy Act and the CR Code to handle personal information relating to credit. If you apply for any kind of credit or offer to act as guarantor, we may disclose your personal information to, or collect personal information about you from, a credit reporting body. This information is used for the purpose of determining your eligibility for credit (or to act as guarantor), and we may process the information to create an unsuitability assessment or other ratings of your suitability for credit (or to provide a guarantee).
- 8.2. Credit reporting bodies may include your personal information in reports that they provide to other credit providers to assist those providers in assessing your credit worthiness (such as when you have applied for a loan from that other provider).
- 8.3. As at the date of this Credit reporting Policy, the only credit reporting body with which we deal is Veda Advantage - www.veda.com.au.
- 8.4. For contact details and information on how that credit reporting body manages credit related personal information, please see its privacy policies available on its website at the above link.

- 8.5. We may add other credit reporting bodies at any time and if we do we will update this statement and provide contact details.
- 8.6. Credit reporting bodies offer a service to credit providers wishing to send direct marketing material about credit services to individuals. This is called “credit pre-screening”. You have the right to request that the credit reporting bodies do not use your information for this purpose. To opt out of credit pre-screening, contact the credit reporting body, using the contact details on its website set out above.
- 8.7. You can also ask a credit reporting body not to use or disclose your personal information for a period if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.
- 8.8. The Privacy Act and the CR Code limit what we can do with the information we obtain from a credit reporting body. Generally, it can only be used in relation to the consumer credit products you hold through us. For example, if you fail to meet your payment obligations in relation to consumer credit, or commit a serious credit infringement, we may be entitled to disclose this to a credit reporting body.

9. Access to and correction of credit information

- 9.1. You can request access to credit information we hold about you. You can also ask for corrections to be made. To do so, please contact us. There is no fee for requesting that your credit information is corrected or for us to make corrections. In processing your request for access to your credit information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.
- 9.2. There are some circumstances in which we are not required to give you access to your credit information. If we refuse to give you access to or to correct your credit information we will give you a notice explaining our reasons except where it would be unreasonable to do so. If we refuse your request to correct your credit information, you also have the right to request that a statement be associated with your credit information noting that you disagree with its accuracy.
- 9.3. If we refuse your request to access or correct your credit information, we will also provide you with information on how you can complain about the refusal.

10. Resolving your credit information concerns and complaints – your rights

- 10.1. If you are concerned about how your credit information is being handled or if you have a complaint about a breach by us of the credit reporting provisions of the Privacy Act or the CR Code, please contact us. We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.
- 10.2. We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

- 10.3. If you are unhappy with our response, there are other bodies to which you can go. Credit and Investments Ombudsman Limited (CIO) can consider most complaints about your credit information involving providers of financial services. CIO may be contacted at:

Credit and Investments Ombudsman Limited
PO Box A252
South Sydney NSW 1235
Phone: 1800 138 422
www.cio.org.au

- 10.4. Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your credit information. The Commissioner may be contacted at:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
www.oaic.gov.au

11. Contact us

- 11.1. You can contact us by:

- (1) Calling us on (02) 9369 3175
- (2) Visiting our websites at www.swmc.com.au or www.ckmmortgages.com.au
- (3) Writing to us at the following address:

PO Box 840
Bondi Junction NSW 1355

12. Changes to our Credit Reporting Policy

- 12.1. We may change the way we handle credit information from time to time for any reason. If we do so, we will update this Credit Reporting Policy. An up-to-date version is available on our websites at www.swmc.com.au and www.ckmmortgages.com.au.

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