

1 Purpose

The purpose of this policy is to be a clearly expressed and up to date policy about the management of credit related personal information including the collection, holding, use and disclosure of such information.

1.1 Definitions

- ✔ **Credit Information:** Personal information related to credit, including identification details, credit history, and financial obligations.
- ✔ **CRB (Credit Reporting Body):** An organization that collects and provides credit-related information to assess an individual's or business's creditworthiness. APS may use CRBs to gather data when deciding whether to extend credit.
- ✔ **EDR (External Dispute Resolution) Scheme:** An independent service that helps resolve disputes between consumers and credit providers without needing to go through formal legal channels.

2 Credit Information Handling at APS

APS is committed to handling Credit Information responsibly and in compliance with the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012. We have trained our employees and implemented procedures to ensure compliance and proper management of Credit Information.

2.1 Types of Credit Information Collected

APS collects and holds the following types of Credit Information:

- ✔ Current and previous names, addresses, age, occupation, and employer details.
- ✔ Driver's licence number.
- ✔ Details regarding applications for commercial credit, including type and amount.
- ✔ Information about the provision of credit, including amounts and any previously provided credit.
- ✔ Date and circumstances of termination of any credit agreement.
- ✔ Repayment history.
- ✔ Details of overdue payments (over 60 days) related to credit provided by APS or other providers, including where you act as a guarantor.
- ✔ Serious credit infringements, if applicable.
- ✔ Arrangements made with APS or other creditors regarding credit provided to you.
- ✔ Court proceedings, personal insolvency, and other credit-related public information.
- ✔ Any information related to your creditworthiness.
- ✔ Administrative information regarding your credit accounts and those of related bodies corporate.

2.2 Collection, Use, and Disclosure of Credit Information

APS collects Credit Information primarily from you or your authorized representative, with written consent. In some cases, we may collect information from third parties, such as Credit Reporting Bodies (CRBs), to support credit assessments.

We collect, use, and disclose Credit Information for purposes including:

- ✔ Assessing your suitability for credit or as a guarantor.
- ✔ Investigating complaints related to credit issues.
- ✔ Taking debt recovery action when necessary, including reporting to CRBs if payment obligations are not met or serious credit infringements occur.

When possible, APS obtains written consent for the collection and disclosure of your Credit Information to and from CRBs. Our aim is to use the information for the primary purpose for which it is collected, in compliance with all legal requirements.

2.3 Storage and Security of Credit Information

APS ensures that all Credit Information is securely stored, either physically or electronically, to prevent unauthorized access, modification, misuse, or disclosure. Measures include:

- ✔ **Electronic Storage:** Password protection and access restrictions on our IT systems.
- ✔ **Physical Storage:** Secure, restricted areas for physical records.
- ✔ **Service Providers:** Ensuring that service providers have appropriate security measures in place.

Access to Credit Information is limited to authorized staff, who are trained in the proper handling and security of personal data. Once Credit Information is no longer required, APS takes reasonable steps to securely destroy or de-identify it.

If we receive unsolicited Credit Information that we are not permitted to collect, we will destroy it as soon as practicable.

2.4 Purpose for Collecting, Holding, Using, and Disclosing Credit Information

APS collects, holds, uses, and discloses Credit Information as required for the business functions and activities of our company, including:

- ✔ Assessing applications for credit or guarantor suitability.
- ✔ Determining creditworthiness.
- ✔ Reporting to Credit Reporting Bodies and participating in recognized credit reporting systems.
- ✔ Taking debt recovery action where necessary, including against guarantors or in the event of infringements.
- ✔ Handling complaints and fulfilling statutory requirements.

3 Disclosure to CRB's

APS may disclose your Credit Information to a Credit Reporting Body (CRB) as permitted by the Privacy Act, including instances where you fail to meet payment obligations or commit a serious credit infringement.

We may disclose your Credit Information to the following CRBs:

Veda Advantage

Level 15, 100 Arthur Street,
NORTH SYDNEY, NSW 2060
Tel: 1300 921 621

NCI

Level 2, 165 Grenfell St,
ADELAIDE, SA 5000
Tel: 1800 882 820

Dun & Bradstreet

Level 2, 143 Coronation Drive,
MILTON, QLD 4064
Tel: 07 3360 0600

Creditor Watch

Level 13, 109 Pitt Street,
SYDNEY, NSW 2000
Tel: 1300 501 312

Experian

Level 6, 549 St Kilda Road,
MELBOURNE, VIC 3004
Tel: 03 9699 0100







A copy of the credit reporting policy for each CRB listed above is available on their website or can be provided in hard copy upon request.

A CRB may use your Credit Information for "pre-screening" for direct marketing purposes. While APS cannot use your Credit Information for direct marketing, a CRB may pre-screen your information and offer you an opportunity to opt-out. You can inform the CRB directly if you do not want your Credit Information used for this purpose.

If you believe you are a victim of credit fraud, you are entitled to place a 21-day ban on the sharing of your Credit Information with CRBs.

3.1 Disclosure to Other Recipients

APS may disclose your Credit Information, if permitted by law, to:

-  Other credit providers.
-  Related companies within APS.
-  Debt collection agencies.
-  Guarantors or security providers in connection with the credit provided.
-  Debt assignment organizations.
-  Credit insurers.

In some cases, we will require your written consent before making such disclosures. This consent is usually obtained through our cost agreement and disclosure or via our privacy statement.

3.2 Accessing Your Credit Information

You have the right to access your Credit Information held by APS. To request access, please contact our Privacy Officer:

The Privacy Officer

Access Platform Systems
25 Tullamarine Park Road
Tullamarine Vic 3043
Phone: 03 9466 1887
Email: info@apsystems.net.au

We aim to respond to your request within 30 days. To ensure the security of your data, we will need to verify your identity before processing your request.

Access will be granted only when permitted by law. In certain situations, where access is unlawful or restricted, APS will provide written notice explaining the reasons for refusal. We do not charge for making an access request, but if applicable, reasonable costs associated with providing access may be charged.

4 Correction of Information

If you believe that the Credit Information we hold about you is incorrect, outdated, or incomplete, you have the right to request a correction. To do so, please contact our Privacy Officer (details above) using the contact details provided above.

When assessing your request, we need to determine whether the information is inaccurate, incomplete, out-of-date, irrelevant, or misleading. If so, we will take all reasonable steps to correct it and ensure it is accurate, up-to-date, complete, relevant, and not misleading.

We aim to resolve correction requests within 30 days. If more time is needed, we will notify you in writing and seek your consent for an extension. If we do not agree to make the correction, we will provide you with written reasons for our decision.

4.1 Record Keeping

APS will maintain records of how Credit Information is used or disclosed, including:

- ✔ Instances where Credit Information is destroyed to comply with legal requirements.
- ✔ Details of Credit Information received from other credit providers, including:
 - Date of disclosure.
 - Description of the information disclosed.
 - Recipient details.
- ✔ Records of consents provided by individuals for disclosure purposes.
- ✔ Records of actions taken related to corrections, complaints, pre-screening, monitoring, and auditing.

We will retain these records for a minimum of five years.

5 Complaints

If you wish to make a complaint about how we have handled your Credit Information or if you believe we have failed to comply with our obligations under the Privacy Act or the Credit Reporting Code (CR Code), please contact our Privacy Officer using the details provided above.

Upon receiving your complaint, we will acknowledge it as soon as possible and aim to resolve the issue within 30 days. During our investigation, we may need to consult a Credit Reporting Body (CRB), another credit provider, or a third party to address your concerns.

If you are not satisfied with our response, you have the right to refer your complaint to an **External Dispute Resolution (EDR) Scheme**. However, APS is not currently a member of an EDR Scheme.

Alternatively, you may lodge your complaint with the **Office of the Australian Information Commissioner (OAIC)**:

Office of the Australian Information Commissioner
GPO Box 5218 Sydney NSW 2001
Email: enquiries@oaic.gov.au
Telephone: 1300 363 992
Facsimile: 02 9284 9666

Please note, the Information Commissioner may decline to investigate a complaint if:

- ✔ You did not first raise the complaint with APS.
- ✔ The complaint has already been appropriately dealt with by a recognized EDR scheme.
- ✔ The complaint could be more effectively addressed by a recognized EDR scheme of which we are a member.

6 Disclosure to Overseas Recipients

APS may, if permitted by law, disclose your Credit Information to recipients outside of Australia. If this occurs, we are required to provide a list of any countries to which Credit Information may be transmitted, where practical.

Currently, APS does not share or disclose any Credit Information to overseas recipients.

For further information about our credit reporting policy or privacy policies, please contact our Privacy Officer using the details provided above.

[Signature Panel]

Nick Macrae – Managing Director
APS Industrial Services Pty Ltd