

Credit Information Policy

Version 1.1

ENHANCING WORKPLACE
PERFORMANCE THROUGH

-  Recruitment
-  Consulting
-  HR Solutions

1. How personal information is collected

This policy applies to personal information and credit information that Davidson collects about individuals from:

- Davidson's Commercial Credit Application form;
- Credit Reporting Bodies (CRBs)
- Trade references; and
- Publicly available sources of information.

2. Kinds of personal information held

Davidson collects and holds information about you, including:

- a) Your name and contact details;
- b) Commercial credit reports from CRBs, including business credit scores and ratings;
- c) Personal credit reports for commercial credit applications;
- d) The date your credit account was established with Davidson or with your nominated trade referees;
- e) Payment information including your repayment history with Davidson and payments owed to Davidson;
- f) Whether in Davidson's opinion or another commercial credit provider's opinion, namely your nominated trade referee's, your organisation pays within payment terms;
- g) Your commercial credit limit amount with Davidson and your nominated trade referees;
- h) Your monthly invoice amounts; and
- i) Certain administrative information relating to credit, such as account and customer numbers.

We may also collect personal information about any other applicants and/or guarantors included in your application for commercial credit. If you provide personal information about any such third party to us, you confirm that you have authority from the applicable individual to your disclosure of their personal information to us and to our use and disclosure of their personal information in accordance with this policy.

Davidson holds credit information about you on our own servers. We take all reasonable steps to protect an individual's information from misuse, interference or loss through the use of firewalls, anti-virus software and ongoing internal monitoring.

3. The purposes for which information is collected and used

Davidson may collect, hold, use and disclose your credit information as reasonably necessary for our business purposes and as permitted by law.

Davidson collects, holds, uses and discloses credit information for the purpose of:

- a) Providing and delivering Davidson's services to you;
- b) Marketing other Davidson services;
- c) Assessing applications for commercial credit and your commercial credit standing at any time in the future;
- d) Establishing and managing the relationship with you;
- e) Exercising its rights and obligations;
- f) Performing any administrative operations; and
- g) Collecting payments.

Davidson cannot provide its services or a commercial credit account without collecting the required information.

Some credit information may only be disclosed under the Privacy Act for some of these purposes or in some circumstances.

4. The purposes for which information is collected and used

Davidson also may exchange personal and credit information about you with other credit providers and trade referees listed in your application or in reports provided by a CRB. Davidson may exchange that information for the purposes of:

- a) Assessing your application for commercial credit and collecting overdue payments;
- b) Notifying other credit providers and trade referees of a default by you;
- c) Ascertaining the status of credit provided to you by Davidson where you are in default with other credit providers; and
- d) Assessing your credit worthiness, credit standing or credit capacity.

Davidson may, as permitted by law, disclose your credit information to other third parties, including our related companies; organisations that perform credit processing functions, management and debt collection activities on our behalf; organisations involved in debt assignment.

Some of these organisations may be located outside Australia, including New Zealand.

The list of other countries Davidson may disclose personal information are set out in the Davidson Privacy Policy, which can be accessed by visiting www.davidsonwp.com.

5. Exchange of personal and credit information with CRBs

Davidson may obtain or disclose consumer or credit reporting information about you (or your organisation) from a CRB for the purposes of:

- a) Assessing applications for commercial credit or managing your account;
- b) Collecting overdue payments relating to commercial credit;
- c) Reporting details of any fraud or other serious credit infringement; or
- d) Any other activity permitted under the Privacy Act.

Davidson uses the credit reporting services provided by Dun and Bradstreet Pty Ltd (D&B). D&B may include information provided by credit providers in reports to assist in assessment of credit worthiness. Please refer to D&B's credit reporting policy for details on its management of credit reporting information.

Dun and Bradstreet (Australia) Pty Ltd
PO Box 743
Toowong Qld 4066
Ph: +61 7 3360 0600

Dun and Bradstreet (New Zealand) Ltd
PO Box 9589 Newmarket
Auckland 1031
Ph: +64 9 359 8000

6. How you may access your information and seek its correction

You are generally entitled under the Privacy Act to access the information we hold about you (in a manner you request, if this is reasonable and practicable). However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your information, we will provide you with our reasons for the refusal.

A request for access can be made by contacting us in any of the ways specified below.

We take all reasonable steps to ensure that any information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide accurate, current and complete information as requested, and properly update the information provided to us to keep it accurate, current and complete.

If the information Davidson holds about you is inaccurate or not up to date you may request that Davidson corrects the information.

Notification and response timeframes and charges that may be imposed in relation to access and correction requests

Obligation	Australia	New Zealand
Deal with an access request	<p>Within 5 working days, respond to the request.</p> <p>You may be charged a fee for access however it will not be excessive and does not apply to making the request.</p>	<p>Within 5 working days, respond to the request.</p> <p>If you want the information quickly (within 5 working days) you may need to pay a reasonable charge, but otherwise no charge will apply)</p>
Deal with a correction request	<ul style="list-style-type: none"> ▪ Within 30 days starting from the day the request is made, correct information ▪ Within a reasonable period of correcting the information, notify the individual of the correction ▪ Within a reasonable period of deciding not to correct the information, notify the individual of that decision and provide reasons 	<ul style="list-style-type: none"> ▪ Within 30 days starting from the day the request is made, correct information ▪ Within a reasonable period of correcting the information, notify the individual of the correction <p>Within a reasonable period of deciding not to correct the information, notify the individual of that decision and provide reasons</p>
Notify third party recipients of the information of correction	<p>Within a reasonable period of correcting the information, give each recipient of the information written notice of the correction</p>	<p>Within a reasonable period of correcting the information, give each recipient of the information written notice of the correction</p>

To contact the Davidson Privacy Officer:

By email: reception@davidsonwp.com

By phone: +61 7 3023 1000

By fax: +61 7 3221 5810

By post: The Privacy Officer
Davidson
GPO Box 2572
Brisbane Queensland Australia 4001

7. How to make a complaint and how complaints will be handled

If you believe that we have not complied with our obligation under Part IIIA of the *Australian Privacy Act 1988*, or the *Credit Reporting Privacy Code 2004* in New Zealand, you have a right to complain, please contact the Davidson Privacy Officer using the details above in section 6.

It is our policy to handle complaints in a timely, effective, fair and consistent manner. On making a privacy complaint to Davidson, you will receive an acknowledgement letter or email within 5 working days. This communication will set out the name of the person responsible for handling your complaint and the expected response time to the complaint. Davidson endeavours to make a decision on all written complaints within 20 working days after a complaint is received. If we need more time to resolve your complaint we will notify you as to the delay, the reasons for it and seek your agreement to a longer period.

If Davidson considers it necessary in order to deal with your complaint, it may consult with a CRB or another credit provider.

If you are not satisfied with the outcome you may complain to the Commissioner.

In Australia:

The Office of the Australian Information Commissioner:

By email: enquiries@oaic.gov.au

By phone: 1300 363 992 in Australia or +61 2 9284 9749 outside Australia

By fax: +61 2 9284 9666

By writing: GPO Box 5218, Sydney NSW 2001

In New Zealand:

The Office of the Privacy Commissioner:

By email: enquiries@privacy.org.nz;

By phone: 0800 803 909

By writing: PO Box 10094, The Terrace, Wellington, New Zealand 6143