## **Credit Reporting Policy**

The Summit Group (Australia) Pty Ltd (**Summit**) credit reporting policy as set out below outlines how Summit manages Your credit information as required by the Privacy Act 1988 (Cth) (the **Act**) and the Privacy (Credit Reporting) Code 2014 (the **CR Code**).

This Credit Reporting Policy is in addition to our Privacy Policy and other Legal Documents which apply to other personal information and should be read in conjunction with this Credit Reporting Policy. Those documents are available at: https://summitinternet.com.au/legal/

This Policy may be updated as and when required, for example, to take into account new laws, changes to Our operations and practices, and changes in the business environment or technology. We may modify this Policy at any time, at our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website.

This Policy includes details on the following types of personal information:

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Credit Information	is personal information that relates to credit that has been
	provided to You or that You have applied for, including credit for
	personal, domestic or household purposes and in connection
	with a business (such as Your identification details, information
	about Your account, the type and amount of credit, and Your
	repayment history information, such as whether You have made
	or missed a payment on Your credit facility).
Credit Eligibility	is personal information related primarily to Your credit-related
Information	dealings with other credit providers and includes credit reporting
	information disclosed by credit reporting bodies to Summit and
	CP derived information.
CP Derived Information	is personal information that is derived from credit reporting
	information about You disclosed to Summit by a credit reporting
	body, that has a bearing on Your credit worthiness and is used,
	has been used or could be used in establishing Your eligibility
	for credit, such as Our internal credit scores.

#### Summit holding and using Your credit information

In offering and providing Services to You (or considering doing do), Summit may collect and hold credit information about You.

We may collect credit-eligibility information from credit reporting bodies from time to time.

The credit-related information Summit usually collects and holds includes:

- identification information such as Your name and addresses, date of birth, occupation, name of Your employer and Your driver's licence number;
- that You have applied for credit, the type and amount of that credit and the fact We have accessed Your credit information to assess a relevant application:
- that We have been a provider of credit to You and the type of account, the date the
  account was opened and closed and maximum amount of credit that We have
  provided or will provide;
- the date that any credit contract We have or had with You was entered into and the date that it is terminated or ceases;
- Your repayment history, including whether or not You made any payment that was due in a particular month, and where a payment was overdue, when it was ultimately paid;

- default information about You, including information about a payment owed by You as a borrower or guarantor in connection with credit that remains overdue for more than 60 days and which We can disclose to a credit reporting body if certain requirements under the Act are met;
- payment information about Your overdue payments;
- an opinion We have on reasonable grounds that You have committed a serious credit infringement in relation to credit that We have provided to You;
- whether You have entered into arrangements with Summit in connection with credit provided to You;
- credit eligibility information as described above;
- court proceedings information, personal insolvency information and credit-related publicly available information; and
- other information relating to Your credit worthiness which is derived by Summit or by credit-reporting bodies wholly or partly on the basis of the information above.

We may collect the above information:

- directly from You or from persons acting on Your behalf;
- from credit-reporting bodies;
- by deriving it from Your usage and repayment of any account held with Summit;
- from Our service providers, and corporate partners with whom we have entered into white-labelling arrangements;
- from debt collection agencies;
- from internet sources including search engines such as Google; and
- from ASIC and other publicly available sources.

In providing services to You, We may collect, use, hold or disclose Your credit information and credit-eligibility information for the following purposes:

- to manage Your account and for the payment for Our services;
- carrying out credit checks or otherwise assessing Your creditworthiness;
- to take action if there is a payment default;
- debt collection;
- to provide information to credit-reporting bodies as permitted by the Act and CR Code; and
- to derive scores, ratings and other information relating to Your credit worthiness which are used in Our decision-making processes.

#### Accessing credit eligibility information held by the Summit

You may ask Summit for access to any credit information and credit-eligibility information We hold about You.

You can do this by sending an email to the following address: hello@summitinternet.com.au

Within 30 days, we provide You with access to any credit information and credit-eligibility information We hold about You.

# Information about how to seek the correction of credit information or credit eligibility information held by Summit

If You think that information is inaccurate or incorrect, You may ask us to consider correcting it or deleting it from Summit's database.

You can do this by sending an email to the following address: hello@summitinternet.com.au

Within 30 days, we will either make the correction and let You know what we have done or deny Your request and let You know why.

If We correct credit-related information that We hold about You without You requesting it, We will take reasonable steps to notify that correction to You.

# How to complain if I think Summit has not complied with the Act, or the registered CR Code

If at any time You feel that Summit has not complied with this Policy, the Act or the CR Code, please let Us know by sending an email to the following address: <a href="mailto:hello@summitinternet.com.au">hello@summitinternet.com.au</a> or write to Us at: Summit Internet, PO Box 3225, Doncaster East VIC 3109.

# Information about how Summit deals with complaints relating to Credit Reporting Matters or matters under the Act or the CR Code

When We receive Your complaint, We will let You know how We intend to deal with Your complaint within 2 days.

Within 30 days We will let You know Our decision and let You know what You can do if You are not satisfied with Our decision.

The way in which We deal with general complaints is set out on Our website at: https://summitinternet.com.au/legal/

If You are unhappy with our resolution of Your complaint, or with the way in which it was handled, You may refer the matter to the Office of the Australian Information Commissioner (for more information, please see <a href="https://www.oaic.gov.au">www.oaic.gov.au</a>).

## How Summit stores your credit information or credit eligibility information

We will keep Your credit-related information secure. Most credit-related information will be stored and processed electronically in Our computer network in Australia. However, some credit-related information will be held in physical files at Our offices or at other sites.

Our staff have unique user identifications and passwords. We work to ensure that Our staff understand all of their and Our responsibilities under the Act. Our physical premises are protected by reasonable security precautions.

# Information about whether Summit discloses credit information or credit eligibility information to entities that do not have an Australian link

We may disclose Your credit information and credit eligibility information to third parties, including:

- some intermediaries;
- Our related companies;
- organisations that perform credit assessment, management and debt collection activities on Our behalf including, but not limited to, Illion, Equifax, Experian, Dun & Bradstreet;
- current or prospective guarantors or security providers in relation to credit We are providing to You;
- organisations involved in debt assignment.

We may also disclose Your credit information to Our service providers and white label partners as permitted by the Act and Code.

In some circumstances, We may require Your consent before being able to make such disclosures.

We may exchange credit-related information as permitted by the Act and CR Code with the following credit reporting bodies:

- Illion
- Equifax
- Experian
- Dun & Bradstreet

You can contact the above credit reporting bodies or visit their websites to see their policies on the management of credit-related information.

Should you fail to meet Your payment obligations to us or commit a serious credit infringement in relation to credit provided by us, we may be entitled to disclose this information to credit-reporting bodies.

Credit reporting bodies may include the information we share with them in reports they provide to other credit-providers to assist them to assess Your credit worthiness.

You have the right to request that the credit reporting body not use or disclose credit reporting information it holds about you in circumstances where you reasonably believe that you have been or are likely to be a victim of fraud, including identity-related fraud. You must contact the credit reporting body directly should this be the case.

If Summit discloses credit information or credit eligibility information to entities that do not have an Australian Link, which countries are those entities are likely to be located?

We do use some services which involve the transfer, processing and storage of some credit information outside of Australia, including New Zealand and Singapore, and these are likewise protected by unique user identifications and passwords.