

# Credit Reporting Privacy Policy of QffS

## Introduction

1. This Credit Reporting Privacy Policy of Pebmac Pty Ltd ACN 010 621 851 trading as Queensland Frozen Food Services and QffS (“**QffS**”) is QffS’ official credit reporting privacy policy as required by the *Privacy Act 1988* (the “Act”) and particularly Part IIIA of that Act and the Credit Reporting Code (the “CR Code”) and it applies to all credit information and credit eligibility information about individuals (“credit information”) collected, held and used by QffS in its activities as a credit provider.

In this policy we explain how and why we collect credit information about individuals, how we use such information, and what controls individuals have over our collection and use of information about them. This policy is relevant to individuals who are current and former credit customers, as well as other individuals that QffS deals with in connection with credit we provide to our credit customers (for instance, such individuals may be guarantors or directors of corporate customers).

2. QffS is committed to complying with Commonwealth legislation and regulations (the Act and the CR Code) governing privacy of credit information about individuals by credit providers and to protecting and safeguarding the privacy of individuals when they deal with us.

## Collection of information and types of information collected

3. QffS collects, holds and uses various types of credit-related information about individuals, which information includes:
  - identification information such as current and prior names and addresses, age, contact details and driver's licence number;
  - applications for credit (including the name of each relevant credit provider), the type and amount of that credit and the fact QffS has accessed credit information to assess a relevant application for its business services;
  - that QffS and other credit providers are or have been a provider of credit to an individual (or an entity associated with an individual) and the type, characteristics and maximum amount of credit that have been provided or will be provided;
  - the date that any credit contract QffS or other credit providers have or had with an individual was entered into and the date that it comes to an end;

- payments owed to QffS or another credit provider, in connection with credit provided to an individual (or an entity associated with an individual) or in relation to which an individual is a guarantor (and, if there is subsequently paid any overdue payment, the fact of that payment);
- whether in QffS' or another credit provider's opinion an individual has committed a serious credit infringement;
- whether an individual has entered into arrangements with QffS or other credit providers in connection with credit provided to the individual (or an entity associated with the individual);
- court proceedings information, personal insolvency information and credit-related publicly available information;
- scores, ratings, summaries, evaluations and other information relating to an individual's credit worthiness which is derived by QffS or its agents wholly or partly on the basis of the information above;
- certain administrative information relating to credit, such as account and customer numbers.

While the Act uses a variety of terms to refer to such information as referred to above, for ease of understanding and reading this policy, such information is referred to hereinafter as "credit information".

4. Credit information may be collected by QffS in a number of ways including:
  - being provided by an individual directly to QffS or by persons acting on behalf of the individual (such as on applications or other forms);
  - being information provided by the individual on an application for credit with another credit provider;
  - being information that is in the public domain;
  - being information that is derived by QffS from an individual's usage and (where applicable) trade on and transactional history on any account (of the individual or of an entity associated with the individual) held with QffS.

## How credit information is held

5. At or before the time any credit information is collected by QffS about an individual, we will take reasonable steps to ensure that the individual is made aware of who we are, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of entities to which we usually disclose such information collected about the individuals, any laws requiring the

collection of the information and the main consequences for the individual if all or part of the information is not collected.

6. QffS may hold credit information about an individual in physical form or in electronic form on our systems or the systems of QffS' IT service providers.

The credit information QffS holds about individuals is protected by physical, electronic, and procedural safeguards and QffS also requires its service providers that hold and process such information on QffS' behalf to follow appropriate standards of security and confidentiality. Any credit information we collect from an individual or about an individual is kept securely and held on secure servers in controlled facilities.

7. QffS trains its staff and others who work for it on how to handle credit information appropriately and QffS restricts access to what is necessary for specific job functions.

## Use of information collected and disclosure of personal information to others

8. QffS may, as permitted by law, collect, hold, use or disclose credit information held about an individual for the purposes for which such information is collected. These purposes include:

- to form decisions as to whether to provide an individual, or an entity associated with an individual, with credit or to accept an individual as a guarantor;
- to make assessments relating to an individual's credit worthiness which are used in QffS' ongoing decision-making processes regarding provision of credit and the amount of such credit;
- to assist an individual or entity associated with the individual in completing a credit application with other credit providers;
- to participate in the exchange of credit information with other credit providers including obtaining from and providing information to other credit providers and/or trade suppliers as permitted by Part IIIA of the Act and the CR Code;
- to assist an individual or entity associated with the individual to avoid defaulting on credit-related obligations to QffS or other credit providers;
- to undertake debt recovery and enforcement activities, including in relation to guarantors, and to deal with serious credit infringements;
- to deal with complaints and meet legal and regulatory requirements; and
- to assist other credit providers to do the same.

(Some credit information may only be used or disclosed under the Act for some of the above purposes or in some particular circumstances. These particular circumstances are set out in clause 9 below.)

9. Generally, QffS will be permitted to use or disclose credit information held about an individual where the individual has consented to the use or disclosure. QffS may disclose credit information to a Credit Reporting Body (“CRB”) and/or other credit providers about an individual for such purposes as set out at clause 8 above as permitted by the Act. For example, QffS may be permitted to disclose credit information to a CRB in such circumstances as where the individual has consented to the disclosure or where the individual has failed to meet payment obligations in relation to credit provided by QffS or if the individual has committed a serious credit infringement. Similarly, QffS will generally be permitted to disclose credit information to another credit provider about an individual where the individual has consented to such disclosure.
10. CRB’s may include credit information provided by QffS in reports provided to other credit providers to assist such other credit providers to assess the individual’s credit worthiness. QffS shares credit information with the following CRB’s:

**Dun & Bradstreet**

PO Box 7405, St Kilda Rd, Melbourne VIC 3004

Email [clientservices@dnb.com.au](mailto:clientservices@dnb.com.au) or call D&B Client Services 13 23 33.

**Veda**

Verify Holdings Australia Ltd, Locked Bag 965, NORTH SYDNEY, NSW 2059

Email: [info@verifycv.com.au](mailto:info@verifycv.com.au)

Website: [www.veda.com.au](http://www.veda.com.au)

You are able to obtain a copy of Dun & Bradstreet’s and Veda credit reporting policies from their websites.

QffS may, in the future, disclose credit information to a CRB other than Dun & Bradstreet and Veda, but prior to disclosing any credit information about individuals to any other CRB, QffS will amend its Credit Reporting Privacy Policy to set out the name and contact details of any such other CRB and will post a notification of the change to the Credit Reporting Privacy Policy on QffS’ website.

## Rights in relation to CRBs

11. Individuals have certain rights in respect of CRB’s and the information a CRB holds about the individual and those rights include:

- Opting out of direct marketing pre-screenings. A CRB may use an individual's credit information to assist a credit provider to market to that individual by pre-screening the individual for direct marketing by the credit provider. This process is known as a "pre-screening". If an individual does not want a CRB (including the CRB listed above) to use that individual's information for the purpose of pre-screening, the individual has the right under the Act to contact the CRB to request that they exclude the individual from such processes.
- If an individual is a victim of fraud (including identity-related fraud). An individual is entitled under the Act to request that a CRB not use or disclose credit reporting information they hold about the individual in circumstances where the individual reasonably believes that they have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a "ban period". An individual can make such a request to any CRB, including those listed above.

## Direct Marketing

12. As part of QffS' functions and business activities and to promote the services we can provide to our customers, including in respect of QffS' credit-related activities, QffS may be permitted to use personal information about individuals that individuals have provided to QffS for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending information to and/or contacting individuals in relation to promotions relating to QffS. All recipients, including individuals, can opt out of receiving direct marketing communications by sending an email to QffS' Privacy Officer at **privacy@qffs.com.au**. In any direct marketing communication we remind recipients of their right to opt out of receiving direct marketing communications. Moreover, as a general rule, a credit provider such as QffS is not permitted to disclose to others credit information about individuals for the purposes of direct marketing.

## Anonymity and Pseudonymity

13. Individuals would generally have the option of dealing with QffS anonymously. However, this only applies where it is not impracticable for QffS to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of QffS may do so anonymously or under a pseudonym.

However, if the dealing with QffS is for QffS to supply goods and services and/or to enter into contractual relations (such as a commercial credit account) with a customer that is the individual or is associated with the individual, then it is impractical for such individuals to deal with QffS on an anonymous basis or under a pseudonym.

## Links

14. Our web site may contain links to other web sites and those third party web sites may collect personal information about individuals. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. QffS encourages users to be aware when they leave the site and to read the privacy statements of each and every web site that collects personally identifiable information.

## Security and storage

15. QffS places a great importance on the security of all information associated with our customers, clients and contractors. We have security measures in place to protect against the loss, misuse and alteration of personal information (including credit information) under our control. QffS takes all reasonable steps to protect individuals' personal information that is under QffS' control from misuse, interference, loss and/or unauthorised access, modification or disclosure. All personal information (including credit information) held is kept securely and that which is held electronically is held on secure servers in controlled facilities.
16. Personal information (including credit information) is de-identified or destroyed securely when no longer required by us and no longer required to be held by us.
17. QffS retains information provided to us, including individuals' contact and financial and transactional information, to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. Such information is held securely, including on secure servers in controlled facilities.
18. No data transmission over the Internet can be guaranteed to be absolutely secure. As a result, while we strive to protect users' personal information (including credit information), QffS cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once QffS receives a transmission, we make every effort to ensure the security of such transmission on our systems.

## Access to and correction of personal information

19. QffS is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and web-site users.
20. Any individual may request access to personal information (including credit information) about them held by QffS. Such a request for access to personal information is to be made to QffS' Privacy Officer:

**QffS' Privacy Officer**

PO Box 3076

Mt Ommaney, QLD, 4074

Telephone: 07 3375 2050

Email: [privacy@qffs.com.au](mailto:privacy@qffs.com.au).

21. Please note QffS does require that, as part of any request by an individual for access to personal information (including credit information), the individual verify their identity so that QffS may be satisfied that the request for access is being made by the individual concerned.
22. Please note that QffS is not required to give an individual access to credit information about them in circumstances where:
  - giving access would be unlawful; or
  - denying access is required or authorised by or under an Australian law or a court/ tribunal order; or
  - giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
23. Inaccurate information will be corrected upon receiving advice to this effect. To ensure confidentiality, details of an individual's personal information (including credit information) will only be passed on to the individual if we are satisfied that the information relates to the individual. From time to time, and having regard to the purpose of the collection and use of personal information (including credit information) about individuals, we may contact individuals to seek confirmation that the personal information provided to us by the individual is accurate, up-to-date and complete.
24. If we refuse to provide an individual with access to their personal information (including credit information) or to correct the personal information (including credit information) held by us about them, then we will provide reasons for such refusal.

Such reasons will set out the grounds for refusal, the mechanisms available to complain about the refusal and any other matters that are required by the Act.

25. QffS will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than 30 days of the request being received.

## Complaints

26. If an individual has a complaint that QffS has not complied with its obligations under the Act then any such complaint should be directed in the first instance to QffS' Privacy Officer at the contact details set out at clause 20 of this policy.
27. Upon receiving a complaint we will, within 7 days, give the complainant written notice acknowledging receipt of the complaint and setting out the process of how we will deal with it. Unless a longer time is agreed by the complainant, we will investigate the complaint and make a decision within 30 days of receipt of the complaint and communicate the decision to the complainant. We aim to resolve all complaints within 30 days of receipt. If we cannot resolve a complaint within 30 days we will notify the complainant of the reasons and specify a date when we expect a decision or resolution will be made and seek the complainant's agreement to extend the 30 period – if the complainant does not agree then we may not be able to resolve the complaint.
28. It may be necessary (and it may be required by the Act), in order to deal with a complaint, to consult with a credit reporting body or another credit provider. Further, if, while a complaint remains unresolved, we are disclosing information subject to the complaint to a third party, we may be required to advise the third party about the complaint.
29. If we find a complaint is justified we will resolve it and do what is required to rectify any breach. QffS is committed to fulfilling its obligations as an APP entity and a credit provider under the Act.
30. If a complainant is not satisfied with the outcome of QffS' internal complaints procedure in respect of QffS' privacy practices then the complainant may refer their complaint to the Office of the Australian Information Commissioner ("OAIC"). The website for the OAIC is: [www.oaic.gov.au](http://www.oaic.gov.au).

## Transfer of information overseas

31. QffS may utilise local and overseas cloud services for the purpose of storing information. Your personal information may be disclosed to a QffS cloud service provider for that purpose. While QffS' cloud service providers are located in Australia, the country location of our cloud service providers may periodically change.
32. In all other instances, personal information will only be disclosed by QffS to overseas recipients in accordance with Australian Privacy Principle 8, such as if the disclosure is required by Australian law.

## Changes to Privacy Policy

33. If QffS decides to or is required to change this Credit Reporting Privacy Policy, we will notify of such amendments on our web site and post changes on our privacy policy page so that users may be aware of any such changes and how they may affect them. As such, please remember to refer back to QffS' privacy policy page regularly to check whether there are any amendments.

## Contacting us

34. For further information regarding our privacy policies, please contact us at the following address:

E-mail: [privacy@qffs.com.au](mailto:privacy@qffs.com.au)

35. For more information on privacy legislation and the CR Code please visit the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).