

Sealanes - Credit Reporting Policy

Last updated March 2016

Sealanes (1985) Pty Ltd (ACN 009 121 331) and its Related Bodies Corporate (as defined by the provisions of the *Corporations Act 2001* (Cth)) (**Sealanes**) is committed to protecting the privacy of individuals and their personal information and complies with the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**), Part IIIA of the Privacy Act and the Credit Reporting Privacy Code (**CR Code**).

The Privacy Act and the CR Code contain provisions regarding the use and disclosure of credit information, which applies in relation to the provision of both consumer credit and commercial credit (as defined by the Privacy Act).

This Credit Reporting Policy forms part of, should be read in conjunction with, Sealanes' Privacy Policy which can be found at <http://sealanes.com.au/privacy-policy/>

1. What is credit information?

- 1.1 Credit information is information that is taken into consideration when you apply for or use credit that has been provided to you, whether in relation to trade credit offered by Sealanes or by any third party such as a credit provider. Credit information also includes information derived from receiving credit reports about you (defined as "*CP derived information*" under the Privacy Act) and credit eligibility information (as defined under the Privacy Act).
- 1.2 As Sealanes provides terms of payment of accounts which are greater than 7 days, we are considered a credit provider under the Privacy Act in relation to any credit we may provide you (in relation to the payment of your account with us).
- 1.3 Currently, Sealanes does not obtain credit reports or credit information from any credit reporting body, nor disclose any credit information to any credit reporting body. In the event this changes, we will update this Credit Reporting Policy.

2. What kinds of credit information do we collect and hold about you?

- 2.1 In general we will require information from you in relation to your identification, such as your name, address, contact numbers and email address.
- 2.2 We may also collect the following types of information, without limitation:
 - (a) that you have been provided with a credit or trading account, the type and amount of that credit;
 - (b) the details of the credit that you have applied for (and, if applicable, that is provided to you), including but not limited to the dates of any credit contract entered into, the due date for repayment, your repayment history, your default information and any related information;
 - (c) an opinion we have on reasonable grounds that you have committed a serious credit infringement in relation to any credit that has been provided to you;
 - (d) details pertaining to your financial position, including any bank account details or credit card details;
 - (e) other credit information related to your credit worthiness which is derived by us; and

- (f) any other credit information considered relevant by Sealanes.
- 2.3 As much as possible or unless otherwise provided under this Credit Reporting Policy, we will collect your information directly from you. If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless such information:
- (a) is collected from publically available sources, including but not limited to any court proceeding information, personal insolvency information and credit related publically available information; or
 - (b) is collected as otherwise required or authorised by law.
- 2.4 To the extent necessary to process your credit application, you **expressly consent** to Sealanes obtaining credit information about you from the types of organisations and individuals listed in paragraph 2.3.

3. The purpose for collecting and using your credit information

- 3.1 We will only use or disclose your credit information for the primary purposes for which it was collected or as consented to or as otherwise set out below.
- 3.2 You consent to us using and disclosing your credit information collected in accordance with paragraph 2, to facilitate a purpose in connection with:
- (a) if required, the verification of your identity;
 - (b) the provision of Sealanes' products and services to you, which shall include but is not limited to:
 - (1) contacting you to discuss your enquiry regarding the products and services Sealanes can provide to you;
 - (2) the administration and management of our products and services, including charging, billing, credit card authorisation and verification, checks for financial standing, credit-worthiness (including but not limited to undertaking an assessment for credit loss and obtaining credit references, if applicable), and fraud;
 - (3) collecting any amounts you may owe us in relation to any credit and dealing with serious credit infringements;
 - (4) assisting you to avoid defaults;
 - (5) any complaints or disputes in relation to any credit facility offered to you; and
 - (6) using the information for our own internal assessment of your credit worthiness (as undertaken by Sealanes);
 - (c) the administration and management of Sealanes, which shall include, but is not limited to:
 - (1) managing the trade credit that we may provide you; and
 - (2) managing our risks and to help identify and investigate illegal activity, such as fraud;

- (d) to provide customer service functions, including handling customer enquiries and complaints (which shall include, but is not limited to, any complaints in relation to non-payment of any account with Sealanes);
- (e) to offer you updates, or other content or products and services that may be of interest to you;
- (f) our compliance with applicable laws; and
- (g) any other matters reasonably necessary to continue to provide our products and services to you.

4. Disclosure of credit information

- 4.1 To the extent necessary, you **expressly consent** to Sealanes disclosing your credit information, including any information derived from your credit information, to the following types of organisations outside of Sealanes. Examples of organisations and/or parties that your credit information may be provided to include:
- (a) offshore and Australian service providers, including IT service providers;
 - (b) related entities and subsidiaries of Sealanes;
 - (c) third parties, such as external debt recovery agents or the appropriate court (depending on the value of the debt) or other entities to whom we are required by law to disclose personal information;
 - (d) applicable third parties, where we believe on reasonable grounds that you have committed a serious credit infringement;
 - (e) your financial institution and in some circumstances, our financial institution or other institution through which payment is made to us; and
 - (f) our contractors and agents, including but not limited to any companies who assist us in providing our products and services to you.
- 4.2 Your personal information and credit information is disclosed to these organisations and/or parties only in relation to the products or services we provide to you, for a purpose permitted by this Credit Privacy Policy and Sealanes' Privacy Policy, or as otherwise informed in a collection notification statement.
- 4.3 We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:
- (a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;
 - (b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
 - (c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
 - (d) if it is required or authorised by law.

- 4.4 In the event we propose to use or disclose such personal information other than for reasons set out in this Credit Reporting Policy or as otherwise provided by Sealanes' Privacy Policy, we will first seek your consent prior to such disclosure or use, unless such use or disclosure is otherwise required by law.

5. How do we store credit information

- 5.1 We will store any credit information you provide to us, or which we obtain about you, with any other personal information we may hold about you, which shall include but is not limited to the use of paper files, electronic files and databases. Credit card information collected by us is encrypted when stored by us.
- 5.2 As indicated in our Privacy Policy, we do not generally utilise third party service providers to assist us in the storage of your personal information, however some parties may undertake services on our behalf which may require them to hold your personal information.

6. Overseas Disclosure

- 6.1 Credit information collected by does not generally disclose credit information overseas, unless you are conducting business overseas or unless one of the types of organisations listed in paragraph 4.1 is based overseas.
- 6.2 As indicated in our Privacy Policy, we may utilise overseas service providers in relation to personal information (excluding credit information). Please see our Privacy Policy for further details.

7. Access to and correction of your credit information

- 7.1 You are entitled to have access to your credit information relating to you which we possess, except in some exceptional circumstances provided by law. You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.
- 7.2 If you would like access to or correct any records of personal information or credit information that we have about you, you are able to access and update that information by contacting us via the details set out at in the next section.
- 7.3 We will need to verify your identity before giving you access to your credit information. We will respond to a request for access within a reasonable period. In relation to credit eligibility information, we will usually provide the information requested within a period of 30 days unless unusual circumstances apply. If we are unable to agree to your request for access, we will advise you of this in writing.

8. Resolving Privacy Complaints

- 8.1 We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.
- 8.2 If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, please contact us by:

- Email: feedback@sealanes.com.au
- Post: PO Box 685, South Fremantle, Western Australia, 6958

- 8.3 Please mark your correspondence to the attention of the Privacy Officer.
- 8.4 In order to resolve a complaint, we:
- (a) will liaise with you to identify and define the nature and cause of the complaint;
 - (b) will keep you informed of the likely time within which we will respond to your complaint; and
 - (c) will inform you of the legislative basis (if any) of our decision in resolving such complaint.
- 8.5 We will keep a record of the complaint and any action taken in our Continuous Improvement Register.