# **Credit Reporting Policy**

Your privacy is important. This information explains how we comply with Australian privacy requirements when we deal with your credit-related information. Please read this information carefully as it includes **notifiable matters** that must be disclosed to you.

Blackmores Limited (ACN 009 713 437) (referred to as "**Blackmores**", "we" and "us") may collect personal information about you when you apply for commercial credit from us or where we request that a director or other authorised representative guarantees the commercial credit to be provided by us to a company or other entity. We may conduct a credit check on you or any directors, partners or other authorised representatives before commercial credit is provided to you or your related entity.

This Policy applies to our collection, use and disclosure of your credit-related information in connection with our retail credit services. Unless you give us your consent to do otherwise, we will only collect, use and disclose your credit-related information in accordance with this Credit Reporting Policy. Where we collect any personal information not related to our retail credit services, we abide by our general Privacy Policy available at <a href="https://www.blackmores.com.au/privacy-policy">https://www.blackmores.com.au/privacy-policy</a>.

Blackmores abides by Part IIIA of the *Privacy Act 1988* (Cth) ("**Privacy Act**"), the *Privacy Regulation 2013* (Cth) and the Privacy (Credit Reporting) Code 2014 (together, the "**Credit Reporting Privacy Laws**"). You can obtain information about the Credit Reporting Privacy Laws and your privacy rights at the "Credit reporting" page of the website of the Office of the Australian Information Commissioner at http://www.oaic.gov.au/privacy/privacy-act/credit-reporting.

# What information do we collect and hold?

We primarily collect information from you that is necessary for us to assess your application to join the Blackmores retail credit service, conduct appropriate checks for credit-worthiness, provide the retail credit service to you or your related entity (such as a company of which you are a director) or to assess whether to accept a guarantee from an individual.

The information we collect, hold and derive can be grouped into categories of information as defined in the Privacy Act, including "credit information", "credit eligibility information" and "CP derived information".

The kinds of "credit information" we collect from you and hold may include:

- identification information, including your name, address, date of birth, gender and contact details (telephone numbers and email address);
- details of your credit history with us (including any repayments that you have missed, late repayments that you have made and information about whether you have met your obligations to repay your credit or satisfy your guarantee);
- information about any credit provided to you by credit providers (including financial institutions, utilities or telecommunications providers);
- details of any credit-related court proceedings that relate to you; and
- details of any bankruptcy or insolvency applications that relate to you.

The kinds of credit eligibility information that we hold may include a credit report or credit assessment score that has been provided to us by our Credit Reporting Body ("**CRB**"), CreditorWatch Pty Ltd.

The kinds of CP derived information that we usually derive from credit reporting information disclosed to us by CreditorWatch Pty Ltd may include internal credit assessment checks and scores.

In this Policy, we use the term "credit-related information" to refer to credit information and credit eligibility information as defined in the Privacy Act.

# How do we collect and hold your credit-related information?

We usually collect credit information in the following ways:

- directly from you, either in person, in documents (such as application forms), by email or via the Blackmores website;
- from third parties, including CRBs, other credit providers or your representatives;
- from publicly available resources; and
- from our own records of how you purchase products from Blackmores.

We hold credit-related information in hard copy and electronic files

If your credit-related information is no longer needed, Blackmores will take reasonable steps to destroy or permanently de-identify it.

#### What are the purposes for which we collect, hold, use and disclose your creditrelated information?

We collect, hold, use and disclose your credit-related information in the ordinary course of conducting our retail credit business. The purposes for which we collect, hold, use and disclose your credit-related information may include:

- to assess any application that you make to us for credit (or which is made by your related entity, such as a company of which you are a director);
- to administer and manage the products and services we provide to you, including to collect payments that are owed to us in relation to any credit that we have provided to you or your related entity;
- where you have offered to guarantee credit, to assess whether to accept your guarantee and the risk of you being unable to meet your obligations;
- to disclose to a third party that you have asked to act as a guarantor of any credit provided to you or your related entity;
- to conduct appropriate checks for credit-worthiness, including disclosing credit information to CRBs, which CRBs may then provide to us credit reporting information about you (such as a credit report);
- to disclose credit reporting information to other credit providers which provide or are considering providing credit to you or to your related entity;
- to deal with access requests, complaints or regulatory matters relating to credit or credit reporting;
- as required or authorised by law or otherwise as permitted under the Credit Reporting Privacy Laws.

If you choose not to provide us with credit-related information, we may not be able to process your application for credit and/or provide you or your related entity with access to the Blackmores retail credit service.

In relation to the information that we may disclose to CRBs, under the Credit Reporting Privacy Laws, CRBs are permitted to use and disclose your credit-related information. If you apply for commercial credit or offer to act as a guarantor, we may disclose your credit-related information to a CRB or we may collect credit-related information about you from a CRB.

We only deal with the following CRB:

CreditorWatch Pty Ltd GPO Box 276, Sydney, NSW, 2001 http://creditorwatch.com.au 1300 50 13 12

Your credit-related information may be used by CreditorWatch Pty Ltd to include in reports provided to credit providers (such as Blackmores) to assist them to assess your credit-worthiness. You have the right to request a CRB not to use your credit reporting information for the purposes of pre-screening of direct marketing by a credit provider. You also have the right to request a CRB not to use or disclose credit reporting information about you, if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud. If you would like more information about how CreditorWatch Pty Ltd manages credit-related information, please see the CreditorWatch Ptv Ltd Privacy Policy available at https://creditorwatch.com.au/page/privacy.

# To whom do we disclose credit-related information?

We will only disclose credit-related information for the purpose for which it was collected or in the following circumstances:

- to external credit management companies that manage our online account applications and the ongoing credit health check of our customers;
- to CreditorWatch Pty Ltd;
- to other credit providers for credit-related purposes such as credit-worthiness, credit rating and credit provision;
- to a guarantor or proposed guarantor named in your retail credit service application form;
- where required or authorised by law or otherwise as permitted under the Credit Reporting Privacy Laws;
- where you consent or have authorised a third party to consent to the disclosure.

# Cross-border disclosure of credit-related information

Blackmores is unlikely to disclose your credit-related information to overseas recipients. Should Blackmores disclose your credit-related information to overseas recipients, we will do so in accordance with this Privacy Policy and the Privacy Act.

# How secure and accurate is your credit-related information?

We will take reasonable steps to ensure that all credit-related information we hold is:

- a) accurate, complete, up-to-date, relevant and not misleading;
- b) stored in a secure environment; and
- c) protected from misuse, interference and loss as well as unauthorised access, modification or disclosure.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your credit-related information.

#### How can you access and correct your credit-related information?

You have a right to access the credit eligibility information that we hold about you. You also have a right to seek to correct the credit-related information that we hold about you.

We will comply with any request to access your credit eligibility information that you send us by email at <u>privacy@blackmores.com.au</u>, except where the Credit Reporting Privacy Laws allow us to refuse to do so. We do not impose any charge for a request for access, but we may charge you a reasonable fee for our costs associated with providing you with access and retrieval costs.

You also have the right to ask us to correct credit-related information about you that is inaccurate, incomplete, out-of-date, irrelevant or misleading. If we refuse to correct your credit-related information as requested, we must within a reasonable period:

- notify you in writing that the correction has not been made and the reasons for not correcting the information; and
- inform you that if you are unsatisfied with our response to your request, you may access a recognised external dispute resolution scheme of which Blackmores is a member or make a complaint to the Australian Privacy Commissioner.

#### How can I contact Blackmores?

You may wish to contact us to ask questions about how we deal with your creditrelated information. You may also complain about any failure by us to comply with the Credit Reporting Privacy Laws. You may do so by contacting our Privacy Officer as follows:

Mail: Blackmores Limited, 20 Jubilee Avenue WARRIEWOOD NSW 2102 AUSTRALIA Attention: Privacy Officer E- mail: privacy@blackmores.com.au Phone: 1800 803 760

For complaints about privacy, we will establish in consultation with you a reasonable process, including time frames, for seeking to resolve your complaint.

#### Australian Privacy Commissioner

If you are not satisfied with the way in which we handle your enquiry or complaint, you can contact the Office of the Australian Privacy Commissioner on Tel: 1300 363 992 or email: enquiries@oaic.gov.au.

#### **Changes to this Credit Reporting Policy**

This is our current Credit Reporting Policy outlining our credit-related information management practices. This Policy replaces any other privacy policy published by us to date. We may vary this policy from time to time. We encourage you to review the Blackmores website regularly to ensure that you are aware of our current Credit Reporting Policy.