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## Credit Reporting Policy

This Credit Reporting Policy applies specifically to credit related personal information which is credit information, credit eligibility information or credit reporting body derived information about an individual (“credit related information”) and sets out how St George Foodservice (St George) collect, hold and disclose that information.

St George is bound by the Privacy Act 1988 (Cth), and the Credit Reporting Privacy Code to the extent applicable in relation to that credit related information.

This Credit Reporting Policy applies in addition to our Privacy Policy which applies to other personal information. A copy of our Privacy Policy can be found on our website at <http://www.stgeorgefoodservice.com.au>

### Your acceptance of this Credit Reporting Policy

By completing a Commercial Account application, trade credit agreement or entering into contracts with us or otherwise providing us with your credit related information, you agree to the terms of this Credit Reporting Policy. Depending on the manner in which you communicate with St George, further privacy related rules or regulations may apply in addition to the matters discussed in this Credit Reporting Policy.

### Credit related information about you we collect and hold

St George collects and holds various kinds of credit related information including:

- (a) identification information (including an individual’s name, age, address etc)
- (b) a statements that information requests have been made by credit providers, mortgage insurers or trade insurers
- (c) payment or default information
- (d) new arrangement information
- (e) court proceedings and personal insolvency information
- (f) publicly available information that relates to an individual’s credit worthiness
- (g) opinions of other credit providers, credit reporting information obtained from credit reporting bodies, such as credit ratings, scores and evaluations about credit worthiness,
- (h) information that we derive from credit reports that has a bearing on your credit worthiness and will be used to establish your eligibility for consumer credit,
- (i) consumer credit liability information, individual’s credit application and repayment history

### How we collect and hold your credit related information

St George will collect your credit related information primarily from you or from someone representing or assisting during your application for credit. However, where it is unreasonable or impracticable to collect it directly from you, we will collect information about you from third parties. Collection of credit related information from third parties will include our agents, Credit reporting Bodies and any other person we consider necessary to carry out our functions.

We take reasonable steps to protect your credit related information from any misuse, interference, loss, unauthorised access, unauthorised modification and unauthorised disclosure.

We store your credit related information in our servers and also in tangible form held at our office. We take steps to protect the security of the related credit information we hold by:

- (a) Restrict the number of employees internally who can access such data.
- (b) Keep hard copies of documents in lockable cabinets.
- (c) Keep audit trails reports when someone has added, changed or deleted personal information held in our electronic database.

Once credit related information is no longer required by us for the purposes for which it was collected or held for, we take all steps as are reasonable to ensure that it is destroyed in a secure manner or de-identify the information.

### **Why we collect, hold, use and disclose your credit related information**

St George collects, holds, uses and discloses credit related information as reasonably necessary for our business purposes and as permitted by law. These purposes are varied and may include:

- (a) assessing whether to provide you or your business with credit or
- (b) to assess your suitability and accept you as a guarantor
- (c) making credit worthiness evaluations
- (d) managing credit provided by St George
- (e) participating in the credit reporting system and providing information to Credit Reporting Bodies as allowed by Part IIIA of the Act and the Code
- (f) to enable a third party such as an insurer to assess the risk of providing insurance
- (g) assess whether to securitise and/or arrange for the securitising of the credit facility where applicable under law
- (h) consider hardship requests
- (i) notifying other credit providers or a Credit Reporting Bodies of a default by you
- (j) to assist you to avoid defaulting on your credit obligations
- (k) undertaking debt recovery and enforcement activities
- (l) dealing with complaints, dispute resolution and complying with legal and regulatory requirements including the *Personal Property Securities Act 2009* (Cth), the *Corporations Act 2001* (Cth) the *Taxation Administration Act 1953* (Cth), the *Income Tax Assessment Act 1936* (Cth) and other taxation laws and any regulations or codes made pursuant to these acts.

If credit related information is not collected by us it may prevent us from engaging in certain activities with you and your business including entering into deferred payment arrangements, trade credit agreements, or other business related activities where we consider obtaining that information is necessary.

### **How we use and disclose your credit related information**

St George may disclose credit related information to Credit Reporting Bodies where the Act and Code permits us to do so. For example, if you or your business fails to meet payment obligations in relation to commercial credit provided by us we may be entitled to disclose credit related information to a Credit Reporting Body.

We are likely to disclose credit related information we collect to the following Credit Reporting Bodies:

Veda Advantage  
Website: <http://www.mycreditfile.com.au>  
Phone: 1300 762 207  
Address: PO Box 964, North Sydney NSW 2059.

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Trade Bureaux Australia Pty Ltd  
Address: P.O Box 131, Wendouree Victoria 3355  
Phone: (03) 9303 8900  
Website: <http://www.tba.net.au>

Further information on how Credit Reporting Bodies manage credit related information can be found on their privacy policies available on their websites, or by contacting them directly.

Some of your rights in relation to Credit Reporting Bodies

A Credit Reporting Body may use your credit related information to assist a credit provider by pre-screening you for direct marketing by the credit provider. If you do not want a Credit Reporting Body to use your credit related information for the purpose of pre-screening, you have the right under the Act to contact them and request that they exclude you.

If you reasonably believe you have been or are likely to be a victim of fraud, you may contact a Credit Reporting Body to request that they not use or disclose your credit related information during a ban period. The Credit Reporting Body will need to explain to you in detail the effects of this ban period.

Disclosure of credit related information to third parties

We may, as permitted by law, disclose your credit related information to third parties including:

- (a) a debt collection agency
- (b) any regulatory, governmental organisation or industry or legal body which governs the conduct of any part of our business in any jurisdiction or as required by law or regulation
- (c) any other third party provided that we obtain your prior written consent
- (d) our financial advisers, legal advisers or auditors
- (e) an external dispute resolution scheme of which we are a member
- (f) your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney)
- (g) where permitted by law, debt collection agencies or other lenders
- (h) Credit Reporting Bodies

We only disclose your credit information and credit eligibility information as permitted by the Act and the CR Code.

Accessing your credit related information

To access the credit related information we hold about you, please send a written request to [privacy@sgfs.com.au](mailto:privacy@sgfs.com.au) or alternatively you can write to

Privacy Officer  
St George Foodservice  
19 Garema Circuit  
Kingsgrove NSW 2208

St George will attempt to grant you access to the credit related information within 30 days of a request but in some circumstances it may take longer. There is no charge associated with making an access request.

Under the Act we may refuse to give access to the credit related information where for example giving access would disclose commercially sensitive information or information relating to existing or anticipated legal proceedings. If we refuse to provide you with access to credit related information held about you by us, then we will provide written reasons for the refusal.

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To ensure that you have access to the most up to date credit related information about you, you should also request access to credit reporting information about you held by the Credit Reporting Body listed above.

#### Correcting your credit related information

If you believe that any credit related information held by us about you is inaccurate, out of date, incomplete, irrelevant or misleading, please request its correction free of charge by contacting our Privacy Officer.

St George will attempt to resolve correction requests within 30 days of your making a request but in some circumstances it may take longer. If we need more time to resolve your request we will notify you as to the delay, the reasons for it and seek your written agreement to a longer period

If your request for correction is completed successful, we will provide written notice of the correction to you, and where practicable and not prohibited by law, to certain other people we provided the pre-correction information (other than identification information) to, such as relevant Credit Reporting Bodies and to any other third party as required under the Act. If we refuse your request for correction, we will provide written reasons for the refusal.

You have the right under the Act and the Code to obtain your credit related information from a Credit Reporting Body free of charge if the access request relates to a decision to correct information about you. That right may be exercised by contacting the relevant Credit Reporting Body.

#### **How you complain about a breach of the Act**

If you wish to complain about a breach of the Credit Reporting Code, you may contact our Privacy Officer in writing at the above address or email to [privacy@sgfs.com.au](mailto:privacy@sgfs.com.au)

St George will acknowledge your complaint in writing within 7 days and we will aim to investigate and try to resolve the complaint within 30 days of receiving it. If we need more time to resolve your complaint we will notify you as to the delay, the reasons for it and seek your written agreement to a longer period. Depending on the nature of the complaint, it may be necessary for us to consult with third parties, including Credit Reporting Bodies or other credit providers, in order to investigate and resolve your complaint.

If you believe that your complaint has not been satisfactorily addressed by us, you may refer the matter to the Australian Information Commissioner (see [www.oaic.gov.au](http://www.oaic.gov.au) for further details or email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)).

#### **Amendments and updates**

We may amend this Credit Reporting Policy at any time. If we propose to change this policy it will be posted on our website and will be effective when posted. Please check our Credit Reporting Policy for updates and amendments on <http://www.stgeorgefoodservice.com.au>

#### **Contact us**

If you have any questions about this Credit Reporting Policy or our handling of your credit related information please contact the Privacy Officer by email or in writing.

Last updated on the 10<sup>th</sup> September 2014