

# Credit Reporting Policy

Last Updated: November 2023

## Introduction

OneFortyOne Plantations Holdings Pty Ltd (ACN 159 689 942) and its related entities (**OneFortyOne**, or **we, our, us**) respects and upholds your rights under the *Privacy Act 2020* (Cth) (**Privacy Act**).

This credit reporting policy (**Credit Reporting Policy**) for OneFortyOne sets out how we comply with our obligations under the Privacy Act and the *Privacy (Credit Reporting) Code 2014* (Cth) (**CRC**). The purpose of this Credit Reporting Policy is to let you know about our management of credit related personal information (which means credit information, credit reporting information, credit eligibility information and/or regulated information) (**Credit Information**) including the collection, holding, use and disclosure of such information.

This Credit Reporting Policy is intended to enhance the transparency of our operations, to notify you of your rights and our obligations, and to provide you with information regarding:

1. the kinds of Credit Information which we will collect and hold;
2. how we collect, hold, use and disclose Credit Information;
3. the purposes for which we collect, hold, use and disclose Credit Information;
4. how you may access Credit Information that is held by us and seek correction of such information;
5. how you may complain about a breach of the CRC and how we will deal with such complaints;
6. whether we are likely to disclose Credit Information to overseas recipients; and
7. if we are likely to disclose Credit Information to overseas recipients, the countries in which such recipients are likely to be located.

OneFortyOne operates forestry and sawmill businesses in the Green Triangle region of South Australia and Victoria which offer approved customers extended payment terms through the provision of credit facilities. OneFortyOne Wood Products Pty Ltd (ACN 621 555 682) opens, manages and operates the credit accounts offered by our sawmill business while OneFortyOne Plantations Pty Ltd (ACN 159 689 988) does this for our forestry business.

OneFortyOne generally only extends credit to customers who are companies and requires individuals to pay for goods and services in advance. However, in connection with the extension of credit to a customer, OneFortyOne may deal with Credit Information about the individuals associated with that customer (for example, the directors of the company who is the customer). OneFortyOne may also deal with Credit Information in connection with any personal guarantee an individual provides in relation to a customer.

This Credit Reporting Policy should be read in conjunction with OneFortyOne's Privacy Policy, which sets out more broadly how we deal with personal information.

## Acknowledgment

We acknowledge that we must take reasonable steps when handling Credit Information.

Although we intend to observe this Credit Reporting Policy at all times, it is not legally binding on OneFortyOne in any way. From time to time we may regard it as necessary or desirable to act outside the policy. OneFortyOne may do so, subject only to any other applicable contractual rights you have and any statutory rights you have under the Privacy Act, the CRC or other applicable legislation.

## The kinds of Credit Information which we collect and hold

We may collect and hold the following types of Credit Information:

1. Current and prior names, addresses and contact details.
2. Credit and/or debit card information or bank account details (for the purposes of processing payment(s)).
3. Details regarding applications for commercial credit including the type and amount of credit requested and the fact that we have assessed an application.
4. Details regarding the provision of credit, the amount and whether any other credit was previously provided.
5. The date that any agreement in relation to credit ceased or was terminated and the surrounding circumstances.
6. Repayment history.
7. Details regarding payment owed to us or any other credit provider, in connection with credit provided to a customer or in relation to which a person associated with the customer is a guarantor, overdue for more than sixty (60) days.
8. Whether in our opinion, or another credit provider's opinion, a serious credit infringement has been committed.
9. Whether a customer, or person associated with a customer, has entered into arrangements with us or other creditors in connection with the credit provided to the customer.

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10. Court proceedings information, personal information and credit related publicly available information.
11. Any information regarding credit worthiness of a customer (or person associated with a customer).
12. Any administrative information about credit accounts of the customer and its related bodies corporate.

## How we will collect, use and disclose Credit Information

Our usual practice will be to collect Credit Information from you (or your authorised representative) directly and with your written consent.

In some circumstances, we may collect Credit Information from a third party. This may include the collection of Credit Information from a Credit Reporting Body (CRB). We will endeavour to obtain your written consent regarding the collection and further disclosure of Credit Information from and to a CRB.

It may be necessary for us to collect your Credit Information for a specific purpose such as the investigation of a complaint.

We may be required to, in some circumstances, if you fail to meet payment obligations or commit serious credit infringement, disclose your Credit Information to a CRB.

We will attempt to use the Credit Information we collect and hold for the primary purpose(s) in respect of which it is collected.

## How we will hold the Credit Information we collect, use and disclose

We will hold the Credit Information in a manner which is secure and protected from unauthorised access.

Your information may be held in either a physical form or in electronic form on our IT system.

Where stored in electronic form on our IT system, we will take steps to protect the information against modification, disclosure or misuse by including such things as physical restrictions, password protections, internal and external firewalls and anti-virus software.

We will also take steps to ensure our service providers have protection for electronic IT systems and other necessary restrictions.

We will endeavour to ensure that our staff are trained with respect to the security of the Credit Information we hold, and we will restrict any access where necessary.

Once information is no longer required, we will take all reasonable steps to either destroy and de-identify the Credit Information in a secure manner and where possible destroy and delete records, except as required for business record purposes.

In the event we hold Credit Information that is unsolicited, and we were not permitted to collect it, the Credit Information will be destroyed as soon as practicable.

## The purposes for which we collect, hold, use and disclose Credit Information

We may collect, hold, use and disclose Credit Information as reasonably necessary so that it may be used directly for the functions or activities of our group and as permitted by law.

We may use an individual's Credit Information for the functions or activities of our group to:

1. consider whether to provide a customer or a related entity with credit, or accept an individual as a guarantor;
2. consider the credit worthiness of a customer (or person associated with a customer);
3. provide information to CRBs and participate with other credit providers in the credit reporting system recognised by the CRC;
4. take debt recovery action and enforcement where necessary to recover amounts against guarantors or where infringements have occurred; and/or
5. consider and address any complaints and comply with our statutory requirements.

## Disclosure to CRBs

As indicated above, we may disclose Credit Information to a CRB in accordance with the permitted disclosures as defined under the Privacy Act, including instances where a customer (or person associated with a customer) fails to meet their payment requirements and/or commits a serious credit infringement.

We may disclose Credit Information to the following CRBs listed below.

Equifax Australia	Creditor Watch	NCI	Illion	Experian
GPO Box 94 North Sydney NSW 2059 Tel: 13 8332	GPO Box 276 Sydney NSW 2001 Tel: 1300 501 312	PO Box 3315 Rundle Mall SA 5000 Tel: 1800 882 820.	PO Box 7405 Melbourne VIC 3004 Tel: 13 23 33	GPO Box 1969 North Sydney NSW 2060 Tel: (02) 8907 7200

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A copy of the credit reporting policy for the CRBs listed above will be available on their website or will be provided by them in hard copy upon request.

You are entitled to also place a twenty-one (21) day ban on the sharing of your Credit Information, if you believe you have become a victim of credit fraud.

## ***Disclosure of Credit Information to other recipients***

We may, if permitted by law, share and/or disclose Credit Information with third parties including:

1. other credit providers;
2. our related companies;
3. debt collection organisations;
4. the joint guarantors or security providers of a customer;
5. debt assignment organisations; and
6. credit insurers.

In some instances, we will require your written consent prior to making such disclosures. We typically obtain this consent via our privacy statement, which is contained in our credit application.

## ***Disclosure of your Credit Information to overseas recipients***

We are not likely to share and/or disclose your Credit Information with recipients outside of Australia.

## **How you may access your Credit Information**

You may request access to Credit Information we hold about you by contacting the Privacy Officer at the address below. Where we hold information that you are entitled to access, we will endeavour to provide you with a suitable range of choices as to how access is provided (e.g. emailing or mailing it to you).

With any request that is made we will need to authenticate your identity to ensure the correct person is requesting the information.

You will only be granted access to your Credit Information where we are permitted or required by law to grant access. We are unable to provide you with access that is unlawful.

We will not charge you for making the request, however if reasonable we may charge you with the costs associated with your request.

## **Correction**

If at any time you believe that Credit Information we hold about you is inaccurate, out of date, incomplete, irrelevant, misleading or incorrect you have the right to make us aware of this fact and request that it be corrected.

If you would like to make a request to correct your information, please contact our Privacy Officer on the details provided below.

In assessing your request, we need to be satisfied that the information is inaccurate, out of date, incomplete, irrelevant, misleading or incorrect. We will then take all reasonable steps necessary to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

It is our normal policy to resolve any correction requests within thirty (30) days. If we require further time, we will notify you in writing and seek your consent.

Should we refuse to correct your Credit Information written notice will be provided to you setting out:

1. the reasons for the refusal (except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so); and
2. the mechanisms available to complain about the refusal; and
3. any other matter prescribed by the regulations.

## **Record keeping**

We will endeavour to keep a record of where all Credit Information is used or disclosed. The types of matters recorded by us include the following.

1. Where Credit Information is destroyed to meet obligations and compliance requirements in accordance with the CRC and the Privacy Act.
2. Where we have received Credit Information from another credit provider:
  - (a) the date on which it was disclosed;

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- (b) a brief description of the information disclosed; and
  - (c) to whom the disclosure was made.
3. Records of any consent provided by an individual for purposes of disclosure.
  4. Records of any correspondence and actions taken in relation to notifications or corrections, complaints, pre-screening, monitoring, and auditing.

We will maintain our records for a minimum period of five (5) years.

## Questions and complaints

If you have any questions about this Credit Reporting Policy or believe that we have at any time failed to keep one of our commitments to you to handle your Credit Information in the manner required by the Privacy Act or the CRC, then we ask that you contact us immediately using the following contact details:

Privacy Officer  
OneFortyOne  
Level 35, 2 Southbank Boulevard  
Southbank, Victoria 3006  
Email: [privacyofficer@onefortyone.com](mailto:privacyofficer@onefortyone.com)

We will provide you with a receipt of acknowledgment as soon as practicable.

We will then endeavour to respond to your complaint and attempt to resolve the issues within thirty (30) days.

In dealing with your complaint, we may need to consult a CRB, another credit provider or a third party.

If you are not satisfied with the process of making a complaint to our office, you may make a complaint to the Information Commissioner, the details of which are below.

### Office of the Australian Information Commissioner

Your complaint must be in writing and can be provided:

Online: [Lodge a privacy complaint with us | OAIC](#)

Post: GPO Box 5288, Sydney NSW 2001

Fax: +61 2 6123 5145

For enquiries or assistance:

Phone: 1300 363 992

The Information Commissioner can decline to investigate a complaint on several grounds including, among other things, where the complaint wasn't made to us first.