

1. Introduction

Ridley Corporation Limited and its related bodies corporate (as defined in the *Corporations Act 2001* (Cth) (together, **Ridley, we, our or us**) are committed to protecting the personal information Ridley collects from you. Part IIIA of the *Privacy Act 1988* (the **Act**) and the Credit Reporting Privacy Code (the **CR Code**) govern how we must manage credit information and credit eligibility information (together, **credit-related information**).

2. Scope

This policy applies to all credit-related information we collect about individuals. In this policy, "you" and "your" means a natural person whose credit-related information we have knowingly collected.

3. Procedure

This policy sets out how Ridley will collect, use, disclose and otherwise manage:

- "credit information", as defined in the Act, which relates to an individual's credit-related dealings with us; and
- "credit eligibility information", as defined in the Act, which relates to an individual's credit-related dealings with other credit providers, including:
 - "credit reporting information", as defined in the Act, provided by credit reporting bodies; and
 - "credit worthiness information" which we derived from credit reporting information.

Please see our Privacy Policy available on our website located at www.ridley.com.au for information on how we manage general personal information. You can also obtain a copy of our Privacy Policy by contacting our Privacy Officer using the details located at the end of this Credit Reporting Policy.

What type of credit-related information do we collect?

The credit-related information which Ridley may collect includes a person's name, address, date of birth, employer, consumer credit liability information, repayment history information, a statement that an information request has been made about the person by a credit provider, mortgage insurer or trade insurer, the type of credit (consumer or commercial) and the amount of credit sought in a credit application form (**Credit Application**) for which we have made an information request to a credit reporting body, default information, payment information, new credit arrangement information, court proceedings information, personal insolvency information, publicly available information, including information that relates to the person's activities in Australia and its credit worthiness or information entered in the National Personal Insolvency Index and an opinion made on reasonable grounds that the person has committed a serious credit infringement in relation to consumer credit..

Methods of collection

Ridley collects credit-related information about individuals including a director, principal, partner or officer of a Ridley customer, a guarantor or anyone else listed on a Credit Application from whom we have received consent.

Ridley collects credit information about individuals, where lawfully permitted to do so, in various ways including:

- collecting information submitted to Ridley on a Credit Application;
- from a credit reporting body; and
- from another credit provider.

Ridley may collect credit reporting information from a credit reporting body.

To the extent necessary, you expressly consent to us obtaining credit-related information about you from the types of external parties listed above.

Purpose of collection

Ridley collects credit-related information for the primary purpose of conducting its business, which includes: assessing any Credit Application made to Ridley, including consideration of the proposed guarantor(s);

- establishing, maintaining accounts and managing the related relationships;
- managing the delivery of products or services;
- dealing with the management, recovery, securitisation and assignment of debts;
- to provide information to debt collection agencies for the purpose of recovering debts;
- assessing credit defaults reported by any credit reporting body or a debt collection agency;
- to prevent or investigate any fraud or crime (or a suspected fraud or crime); and
- as required by law to do so.

Use and Disclosure of Information

To enable Ridley to assess a Credit Application Ridley may, where the individual has given consent:

- obtain from a credit reporting body a credit report containing personal information about the individual listed on the Credit Application; and
- obtain a report from a creditor reporting body and other information in relation to the commercial credit activities of all individuals listed on the Credit Application.

Ridley may, where the individual has given consent, give to, and obtain from, any credit provider named in the Credit Application and credit providers that may be named in a credit report issued by a credit reporting body information about that person's credit arrangements.

Credit reporting information can be used for the purposes of assessing an application for credit, assisting the applicant to avoid defaulting on its credit obligations, notifying other credit providers of a default by it, assessing credit worthiness, assessing whether Ridley ought to accept the customer as a guarantor in relation to an application for credit and internal management, being purposes directly related to the provision or management of credit.

Ridley may also disclose credit-related information to credit reporting bodies in relation to credit-relating dealings, for example where an individual fails to meet payment obligations or commits a serious credit infringement.

Ridley may disclose credit information to the following credit reporting bodies:

Equifax Pty Limited, National Credit Insurance (Brokers) Pty Ltd and Compagnie Francaise D'Assurance Pour Le Commerce Exterieur.

Each of these credit reporting bodies are required to have a policy about how they manage credit-related personal information. These policies can be accessed on each credit reporting body's website or by contacting them directly.

An individual has the right to request a credit reporting body not to use its credit reporting information for pre-screening direct marketing requested by a credit provider. This request should be made directly to the credit reporting body.

Ridley will not disclose credit-related information overseas except as otherwise contemplated in its Privacy Policy.

Access and correction

If you wish to access or correct errors in any credit-related information we hold, please contact us using the contact details below. Ridley may impose a reasonable charge for providing access to credit-related information.

Ridley will take reasonable steps to correct any credit information that Ridley learns is inaccurate, incomplete, irrelevant, misleading or no longer up-to-date.

Security

Ridley will take reasonable steps to keep any credit-related information it holds about an individual secure, protected from misuse and interference and unauthorised modification. We have appropriate systems and processes in place to keep our information systems and files secure from unauthorised access and our staff and contracted agents and service providers have been informed of the importance we place on protecting your privacy and their role in helping us to do so.

Please be aware that no security measures are perfect or impenetrable. Ridley cannot control the actions of other users with whom individuals share their information. Ridley cannot guarantee that only authorised persons will access or view individuals' credit-related information.

Storage of credit-related information

The credit-related information Ridley collects is stored on a database which is hosted in Australia.

Ridley will maintain the following records:

- (a) where Ridley receives credit eligibility information disclosed to it by another credit provider:
 - (i) the date on which that information was disclosed;
 - (ii) the credit provider who disclosed the information;
 - (iii) a brief description of the type of information disclosed; and
 - (iv) the evidence relied upon that the consent requirements have been met;
- (b) for each disclosure that Ridley makes of credit reporting information or credit eligibility information (as applicable):
 - (i) the date of the disclosure;
 - (ii) a brief description of the type of information disclosed;
 - (iii) the recipient of the information;
 - (iv) evidence that the disclosure was permitted under the Act or the CR Code;
- (c) records of any consent provided by an individual for the purposes of Part IIIA of the Act or the CR Code; and
- (d) records of correspondence and action taken in relation to requests for, or notifications of, corrections, complaints and monitoring and auditing of Ridley in accordance with the Act and the CR Code.

Ridley will retain the records listed above for a minimum of five years from the date on which the record is made, provided that, if any credit-related information that Ridley holds is no longer needed for the purpose for which it was collected or disclosed, and no applicable law requires Ridley to retain that information, Ridley will take reasonable steps to de-identify or destroy the relevant credit-related information.

Further information and complaints

If you would like further information on this policy, or you believe Ridley has breached its obligations under Part IIIA of the Act or the Credit Reporting Privacy Code, please contact our Privacy Officer:

Address: Privacy Officer, Ridley Corporation Limited, PO Box 16187, Collins Street West, Melbourne, VIC 8007

Email: privacy@ridley.com.au

Phone: (03) 8624 6500

We will investigate any complaint and respond to you in writing. We will endeavour to resolve any complaint within 30 business days. If you are not satisfied with our response, you can contact us to discuss your concerns further or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

Changes to this policy

From time to time, we may change this policy in our absolute discretion. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.

Approved: January 2023