

**Combined Industries Pty Ltd t/as MBL Food Service  
in association with Master Butchers Co-operative Ltd  
ABN 58 874 245 597 ACN 007 562 932**

**Privacy & Credit Reporting Policy March 2020**

**Respecting your privacy**

We respect your personal information, and this Privacy Policy explains how we handle it.

We will comply with the **Privacy Amendment (Enhancing Privacy Protection) Act 2012** which amends the **Privacy Act 1988 (Cth)** including Division 3 of Part IIIA and the Australian Privacy Principles contained in the Act as well as the Credit Reporting Privacy Code (CR Code) and are committed to protecting personal information (including credit information and credit eligibility information) we may hold at any time in respect of any individual, in accordance with those requirements.

**Credit Reporting Policy**

This Policy also includes our credit reporting policy, that is, it covers additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information below as **credit information**.

**What personal information do we collect and hold? - General Information**

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- other contact details such as social media handles;
- financial details such as your tax file number;
- credit information such as details relating to credit history, credit capacity, and eligibility for credit ('credit worthiness'); and
- other information we think is necessary.

**Types of Credit Information we collect**

**Information from a credit reporting body**

When we're checking your credit worthiness, and at other times, we might collect information about you from and give it to credit reporting bodies. This information can include:

**ID information:** a record of your name(s) (including an alias or previous name), date of birth, gender, current or last known address and previous two addresses, name of current or last known employer and driver's license number.

**Information request:** a record of a lender asking a credit reporting body for information in relation to a credit application, including the type and amount of credit applied for.

**Default information:** a record of your consumer credit payments being overdue.

Consumer credit is credit that is intended to be used wholly or primarily:

- for personal, family or household purposes; or
- to acquire, maintain, renovate or improve residential property for investment purposes or to refinance credit for any of these purposes.

**Serious credit infringement:** a record of when a lender reasonably believes that there has been a fraud relating to your consumer credit or that you have avoided paying your consumer credit payments and the credit provider can't find you.

**Personal insolvency information:** a record relating to your bankruptcy or your entry into a debt agreement or personal insolvency agreement.

**Court proceedings information:** an Australian court judgment relating to your credit.

**Publicly available information:** a record relating to your activities in Australia and your credit worthiness.

**Consumer credit liability information:** certain details relating to your consumer credit, such as the name of the credit provider, whether the credit provider has an Australian Credit License, the type of consumer credit, the day on which the consumer credit was entered into and terminated, the maximum amount of credit available and certain repayment terms and conditions.

**Repayment history information:** a record of whether or not you've made monthly consumer credit payments and when they were paid.

Consumer credit liability information and repayment history information: These information types can only be provided to credit reporting bodies on and after 12 March 2014 in connection with a consumer credit facility.

**Payment information:** If a lender gave a credit reporting body default information about you and the overdue amount is paid, a statement that the payment has been made.

**New arrangement information:** If a lender gave credit reporting body default information about you and your consumer credit contract is varied or replaced, a statement about this.

We base some things on the information we get from credit reporting bodies. Information that we get from a credit reporting body or information we derive from such information is known as **credit eligibility information**.

**What sensitive information do we collect?**

Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

Sometimes we need to collect sensitive information about you. Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information. We may collect information about you because we are required or authorized by law to collect it. Unless required by law, we will only collect sensitive information with your consent.

### **What do we collect via your website activity?**

We monitor your use of our website to identify ways we can improve our services for you.

If you start but don't submit an on-line application, we can contact you using any of the contact details you've supplied to offer help completing it. The information in applications will be kept temporarily then destroyed if the application is not completed.

We also know that some customers like to engage with us through social media channels. We may collect information about you when you interact with us through these channels. However for all confidential matters, we'll ensure we interact with you via a secure forum.

To improve our services and products, we sometimes collect de-identified information from web users. That information could include IP addresses or geographical information.

### **Cookies Policy (where applicable)**

We use cookies on our websites to provide you with a better and more effective website experience. A "cookie" is a small text file placed on your computer by a webpage server which may later be retrieved by webpage servers. In common with most other websites, our website uses cookies to collect information about your use of that website.

Cookies allow website operators to assign a unique identifier to a computer, which can be used to associate requests made to the website by that computer. Cookies indicate to a website that a computer has been there before and can be used to record things such as what parts of a website or other websites have been visited from that computer.

We use cookies for various purposes. A cookie is allocated to each Internet browser that visits a website belonging to us.

This cookie does not allow us to collect personally identifiable information about you, but is used:

- to allocate an identification number to your Internet browser (you cannot be identified from this number);
- to determine if you have previously visited the website;
- to track and report on website performance;
- to identify other pages or third parties' websites you have accessed;
- for security purposes.

We also use cookies to personalize your web browsing experience, including your access to services that we provide on our website. Cookies do not store customer identifiable information and are not used for marketing or tracking of individuals. If these cookies are of concern they can be turned off. If you wish, you can generally configure your browser so that it does not receive cookies, but if you do so some of the functionality of our website may not be available. If cookies are disabled a service may not recognize you or not operate effectively.

### **How we collect and hold your information**

We understand that your personal information needs to be looked after and isn't something you leave lying around for just anybody to take. So unless it's unreasonable or impracticable, we will try to collect personal information directly from you (referred to as '**solicited information**'). For this reason, it's important that you help us to do this and keep your contact details up-to-date.

There are many ways we seek information from you. We might collect your information when you fill out a form with us, either in paper or electronic format, when you've given us a call, used our websites or visited one of our branches. We also find using electronic means, such as email or SMS, a convenient way to communicate with you.

### **How we collect your information from other sources**

Sometimes we collect information about you from other sources. We do this only if it's necessary to do so. Instances of when we may need to include where:

- we can't get hold of you and we rely on publicly available information to update your contact details;
- we are checking the security you are offering through public registers and our service providers; and
- at your request, we exchange information with your legal or financial advisers or other representatives.

### **What if you don't want to provide us with your personal information?**

If you don't provide your personal information to us, we may not be able to:

- provide you with the product, service or facilities you want;
- manage or administer your account or service;
- verify your identity or protect against fraud; or
- let you know about other products or services from across the Company that might better meet your needs.

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

We will collect your credit information from details included in your application for credit (whether paper based, phone or electronic). In addition to what we say above about collecting information from other sources, other main sources for collecting credit information are:

- credit reporting bodies;
- other credit providers;
- your co-applicants;
- your guarantors/proposed guarantors;
- your accountant or other referees;
- your agents and other representatives such as your referrers, brokers, solicitors, conveyancers and settlement agents;
- organizations that help us to process credit applications;
- organizations that check the security you are offering such as valuers;
- organizations providing insurance to us or;
- our service providers involved in helping us to provide credit or to administer credit facilities, including our debt collectors and our legal advisers.

### **What do we do when we get information we didn't ask for?**

People sometimes share information with us we haven't sought out (referred to as 'unsolicited information'). Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we destroy or de-identify it.

### **When will we notify you that we have received your information?**

When we receive personal information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

### **How do we take care of your personal information?**

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference, loss, unauthorized access, modification or disclosure. How we do this are:

- confidentiality requirements of our employees;
- document storage security policies;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites.

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

### **What happens when we no longer need your information?**

We'll only keep your information for as long as we require it for our purposes. When we no longer require your information, we'll ensure that it is destroyed or de-identified.

### **What are the main reasons we collect, hold and use your information?**

Because we offer a range of services and products, collecting your personal information allows us to provide you with the products and services you've asked for. This means we can use your information to:

- provide you with information about products and services;
- consider your request for products and services, including your eligibility;
- process your application and provide you with products and services; and
- administer accounts, products and services which include answering your requests and complaints, varying those accounts, products and services, taking any required legal action in relation to your account.

### **Marketing**

We may use or disclose your personal information to let you know about products and services from across the Company that might better serve your needs or running competitions or promotions and other opportunities in which you may be interested.

We may conduct these marketing activities via email, telephone, SMS, iM, mail, or any other electronic means. We may also market our products to you through third party channels (such as social networking sites), or based on your use of Company programs. We will always let you know that you can opt out from receiving our third party or Company program marketing offers.

On those occasions when we market to prospective customers, we are happy to let them know how we obtained their information and will provide easy to follow opt-outs.

With your consent, we may disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organization outside of the Company.

### **Yes, You Can Opt-Out**

You can let us know at any time if you no longer wish to receive direct marketing offers from the Company (see 'Contact Us'). We will process your request as soon as practicable.

### **Here are some other ways we may use your information**

- identifying you or verifying your authority to act on behalf of a customer;
- telling you about other products or services that may be of interest to you, or running competitions and other promotions (this can be via email, telephone, SMS, iM, mail, or any other electronic means including via social networking forums), unless you tell us not to;
- assisting in arrangements with other organizations (such as loyalty partners) in relation to a product or service we make available to you;
- allowing us to run our business and perform administrative and operational tasks, such as:
- training staff;
- developing and marketing products and services;
- risk management;
- systems development and testing, including our websites and other online channels;
- undertaking planning, research and statistical analysis;
- determining whether a beneficiary will be paid a benefit;
- preventing or investigating any fraud or crime, or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and for any purpose for which you have given your consent.

### **How we use your credit information**

In addition to the ways for using personal information mentioned above, we may also use your credit information to:

- enable a credit insurer to assess the risk of providing insurance to us or to address our contractual arrangements with the insurer;
- assess whether to accept a guarantor or the risk of a guarantor being unable to meet their obligations;
- consider hardship requests; and
- assess whether to register a security interest.

### **Who do we share your personal information with?**

To make sure we can meet your specific needs and for the purposes described in 'Using your personal information', we sometimes need to share your personal information with others. We may share your information with other organizations for any purposes for which we use your information.

### **Sharing within the Company**

We may share your personal information with other Company entities. This could depend on the product or service you have applied for and the Company entity you are dealing with.

### **Sharing at your request**

We may need to share your personal information with:

- your representative or any person acting on your behalf (for example, financial advisers, lawyers, accountants, administrators, trustees, guardians, brokers or auditors); and
- personal referees (to confirm details about you).

### **Sharing with Credit Reporting bodies**

We may disclose information about you to a credit reporting body if you are applying for credit or you have obtained credit from us or if you guarantee or are considering guaranteeing the obligations of another person to us or you are a director of a company that is a credit applicant or borrower or guarantor. When we give your information to a credit reporting body, it may be included in reports that the credit reporting body gives other organizations (such as other credit providers) to help them assess your credit worthiness.

Some of that information may reflect adversely on your credit worthiness, for example, if you fail to make payments or if you commit a serious credit infringement (like obtaining credit by fraud). That sort of information may affect your ability to get credit from other credit providers.

### **Sharing with third parties**

We may disclose your personal information to third parties outside of the Company, including:

- those involved in providing, managing or administering your product or service;
- authorized representatives of the Company who sell products or services on our behalf;
- medical professionals, medical facilities or health authorities who verify any health information you may provide;
- valuers, insurers, re-insurers, claim assessors and investigators;
- organizations involved in debt collecting, including purchasers of debt;
- fraud reporting agencies (including organizations that assist with fraud investigations and organizations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- government or regulatory bodies (including ASIC and the Australian Tax Office) as required or authorized by law (in some instances these bodies may share it with relevant foreign authorities);
- our accountants, auditors or lawyers and other external advisers;
- any party involved in securitizing your facility, including re-insurers and underwriters, loan servicers, trust managers, trustees and security trustees;
- guarantors and prospective guarantors of your facility;
- organizations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- where you've given your consent.

### **Overseas Disclosures - Sharing outside of Australia**

As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

We will not send your personal information outside Australia unless we are satisfied that the overseas recipient of the information has adequate data protection arrangements in place, or you have consented to the transfer of the information.

We may disclose your personal information to our third party services providers for them to help us provide services to you.

We may store your information in cloud or other types of networked or electronic storage. Overseas organizations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

We will not share any of your credit information with a credit reporting body, unless it has a business operation in Australia. We are not likely to share credit eligibility information (that is, credit information we obtain about you from a credit reporting body or that we derive from that information) with organizations unless they have business operations in Australia.

### **Accessing your Personal and Credit Information**

We'll always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us to access your personal information that we hold by filling out the Personal Information Access Form. In some cases we may be able to deal with your request over the phone or in person.

Customers who have any concerns about the Privacy Policy or who would like a copy of the Personal Information Access Form are requested to direct them to **The Privacy Officer, at Master Butchers Co-operative Ltd, PO Box 46, Mansfield Park, SA, 5012**

We will give you access to your information in the form you want it where it's reasonable and practical to do so.

### **Exceptions**

We're not always required to give you access to your personal information. Some of the situations where we don't have to give you access include when:

- we believe there is a threat to life or public safety;
- there is an unreasonable impact on other individuals;
- the request is frivolous;
- the information wouldn't be ordinarily accessible because of legal proceedings;
- it would prejudice negotiations with you;
- it would be unlawful;
- it would jeopardize taking action against serious misconduct by you;
- it would be likely to harm the activities of an enforcement body (e.g. the police); or
- it would harm the confidentiality of our commercial information.

In relation to credit eligibility information, the exceptions may differ.  
If we can't provide your information in the way you've requested, we will tell you why in writing.

### **How to access your credit eligibility information**

Where you request access to credit information about you that we've got from credit reporting bodies (or based on that information), you have the following additional rights. We must:

- provide you access to the information within 30 days (unless unusual circumstances apply);
  - make the information clear and accessible; and
  - ask you to check with credit reporting bodies what information they hold about you.
- This is to ensure it is accurate and up-to-date.
- We are not required to give you access to this information if:
  - it would be unlawful; or
  - it would be likely to harm the activities of an enforcement body (e.g. the police).

We may also restrict what we give you if it would harm the confidentiality of our commercial information.

If we refuse to give access to any credit eligibility information, we will tell you why in writing. If you have concerns, you can complain to our External Dispute Resolution Scheme or the Office of the Australian Information Commissioner.

### **Correcting your Personal and Credit Information**

#### **How we correct your information**

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it is:

- inaccurate;
- out of date;
- incomplete;
- irrelevant; or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

#### **What additional things do we have to do to correct your credit information?**

If you ask us to correct credit information, we will help you with this in the following way.

#### **Helping you manage corrections**

Whether we made the mistake or someone else made it, we are required to help you ask for the information to be corrected. So we can do this, we might need to talk to others. However, the most efficient way for you to make a correction request is to send it to the organization which made the mistake.

#### **Where we correct information**

If we're able to correct the information, we'll let you know within five business days of deciding to do this. We'll also let the relevant third parties know as well as any others you tell us about. If there are any instances where we can't do this, then we'll let you know in writing.

#### **Where we can't correct information**

If we're unable to correct your information, we'll explain why in writing within five business days of making this decision. If you have any concerns, you can access our External Dispute Resolution Scheme or make a complaint to the Office of the Australian Information Commissioner.

#### **Time frame for correcting information**

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that's been agreed by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter;
- ask you to agree in writing to give us more time; and
- let you know you can complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

### **Resolving your Privacy Issues**

If you have a complaint about how we handle your personal information you are always welcome to contact us.

You can contact us by:

- submitting a mailed or emailed request;
- calling our Privacy Officer; or
- speaking to us in person.

We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days.

### **Further Options**

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner.

#### **What additional things do we have to do to manage your complaints about credit information?**

If your complaint relates to how we handled your access and correction requests you may take your complaint directly to our External Dispute Resolution Scheme or the Office of the Australian Information Commissioner. You are not required to let us try to fix it first.

#### **For all other complaints relating to credit information**

If you make a complaint about things (other than an access request or correction request) in relation to your credit information, we will let you know how we will deal with it within seven days.

#### **Ask for more time if we can't fix things in 30 days**

If we can't fix things within 30 days, we'll let you know why and how long we think it will take. We will also ask you for an extension of time to fix the matter. If you have any concerns, you may complain to an External Dispute Resolution Scheme or the Office of the Australian Information Commissioner.

### **Informing you about our decision**

We'll let you know about our decision within 30 days or any longer agreed time frame. If you have any concerns, you may complain to our External Dispute Resolution Scheme or the Office of the Australian Information Commissioner.

### **Contact credit reporting bodies if you think you have been the victim of a fraud**

If you believe that you have been or are likely to be the victim of fraud (including identify fraud), you can request a credit reporting body not to use or disclose the information they hold about you. If you do this, the credit reporting body mustn't use or disclose the information during an initial 21 day period without your consent (unless the use or disclosure is required by law). This is known as a ban period.

If, after the initial 21 day ban period, the credit reporting body believes on reasonable grounds that you continue to be or are likely to be the victim of fraud, the credit reporting body must extend the ban period as they think reasonable in the circumstances. The credit reporting body must give you a written notice of the extension.

### **Contact credit reporting bodies if you don't want your information used by them for direct marketing/pre-screening purposes**

Credit reporting bodies can use the personal information about you that they collect for a pre-screening assessment at the request of a credit provider unless you ask them not to. A pre screening assessment is an assessment of individuals to see if they satisfy particular eligibility requirements of a credit provider to receive direct marketing. You have the right to contact a credit reporting body to say that you don't want your information used in pre screening assessments. If you do this, the credit reporting body must not use your information for that purpose.

### **Anonymous/Pseudonym**

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way however as we are often governed by strict regulations that require us to know who we're dealing with. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable; or
- we are required or authorized by law or a court/tribunal order to deal with you personally.

### **What do we do with government-related identifiers?**

In certain circumstances we may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless we are authorized by law.

### **Changes to this Privacy Policy**

This Policy may change. We will let you know of any changes to this Policy by posting a notification on our website. Any information collected after an amended privacy statement has been posted on the site, will be subject to that amended privacy statement

### **Contact us**

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by:

- submitting a mailed or emailed request;
- calling our Privacy Officer; or
- speaking to us, in person.