

Vodafone credit-related personal information management policy

What kinds of credit information do we collect or hold?

We may collect and hold credit information about You, such as:

- Your name, date of birth, gender, residential address (and up to two previous addresses), the name of Your current or last known employer and Your driver's licence number;
- the name of any entities which provide consumer credit to You, whether those entities hold an Australian credit licence, the type of consumer credit those entities provide to You, the date on which the consumer credit is entered into and the terms and conditions relating to repayment of the consumer credit (or other terms and conditions relating to the consumer credit prescribed by regulations made under the Privacy Act), the maximum amount of credit available and the date any consumer credit is terminated or otherwise ceases to be in force;
- information as to whether any other credit provider, mortgage insurer or trade insurer has requested certain information about You from a credit reporting body, and the type of credit and amount of credit sought in connection with the request;
- the type of credit and the amount of credit sought in an application You have made to a credit provider;
- subject to the relevant credit provider having given You notice required under the Privacy Act, information about a payment of an amount equal to or greater than \$150 (or a higher amount prescribed by regulations made under the Privacy Act) that You are at least 60 days overdue in making in relation to consumer credit, and information about when such an overdue payment has been paid;
- information as to any variation of the terms and conditions of consumer credit provided to You, or as to whether You have been provided with new consumer credit, because of a payment being so overdue;
- information about a judgement of an Australian court that is made, or given, against You in proceedings (other than criminal proceedings) and that relates to any credit that has been provided to, or applied for by, You;
- information about You that is entered or recorded in the National Personal Insolvency Index and that relates to:
 - a bankruptcy of You;
 - a debt agreement proposal given by You;
 - a debt agreement made by You;
 - a personal insolvency agreement executed by You;
 - a direction given, or an order made, under section 50 of the Bankruptcy Act that relates to Your property;
 - an authority signed under section 188 of the Bankruptcy Act that relates to Your property;
- any other publicly available information that relates to Your activities in Australia or the external Territories and Your credit worthiness; and

- the opinion of a credit provider that You have committed, in circumstances specified by the provider, a serious credit infringement in relation to consumer credit provided by the provider to You.

How do We obtain credit information?

We may obtain credit information in a number of ways, including:

- when You complete a Vodafone account application, service enquiry form, or similar;
- from other companies in the Vodafone group;
- from third party companies like credit reporting bodies, other credit providers, law enforcement agencies and other government entities;
- from publicly available sources of information;
- during recordings of calls made when You contact Vodafone.

We may also collect credit information by other means and will take all reasonable steps to inform You if and when We do.

How do We hold credit information?

We hold that information in an encrypted electronic database located in Australia.

What kinds of credit eligibility information do We hold?

We may hold credit eligibility information about You, such as:

- any of the types of credit information listed above which was disclosed to Us by a credit reporting body under the Privacy Act;
- any personal information (other than sensitive information (as defined in the Privacy Act)) about You that is derived by a credit reporting body from credit information about You that is held by the body that has any bearing on Your credit worthiness and that is used or could be used in establishing Your eligibility for consumer credit; and
- information We derive from that credit reporting information (as described below).

How do We hold credit eligibility information?

We hold credit eligibility information in an encrypted electronic database located in Australia.

What kinds of information do We derive from credit reporting information?

From the credit reporting information disclosed to Us by a credit reporting body, We derive the following kinds of credit provider derived information:

- Information might be derived from, for example, a credit score calculated from credit reporting information.

Why do We collect, hold, use or disclose credit information or credit eligibility information?

We may collect, hold, use and disclose credit information and credit eligibility information about You for the following purposes:

- assessing Your application for a postpaid service;
- collecting payments that are overdue;
- a commercial credit related purpose, if You give Us Your consent;

Our internal management purposes that are directly related to the provision or management of consumer credit or commercial credit;

- assisting You to avoid defaulting on Your obligations under Your agreement(s) with Us.

Can You access the credit information or credit eligibility information We hold about You?

You, a person who is assisting You to deal with Us or a person authorised in writing by You to do so (an **access seeker**) may access credit information or credit eligibility information that We hold about You by contacting Our Credit team at the following address: credit@vodafone.com.au

We may not be able to provide access to Your credit information or credit eligibility information if:

- giving access would be unlawful; or
- denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

We may charge a fee for giving access to credit eligibility information about You. If We refuse to give the access seeker access to credit eligibility information that We hold about You, We will tell You why.

How accurate is the credit information or credit eligibility information We hold?

We take reasonable measures to ensure that the credit information and credit eligibility information We hold is accurate, up-to-date and complete. You may seek the correction of credit information or credit eligibility information We hold about You by emailing credit@vodafone.com.au

How can You complain if You believe We have failed to comply with the *Privacy Act* or the *Credit Reporting Code*?

If You believe that We have failed to comply with Division 3 of Part IIIA of the *Privacy Act* or the *Credit Reporting Code*, You may make a complaint by emailing credit@vodafone.com.au and specifying the nature of Your complaint. If Your complaint relates to a breach of section 21T or 21V of the *Privacy Act*, You may complain to the Australian Privacy Commissioner.

If You make such a complaint to Us, We will:

- give You a written acknowledgement of Your complaint within 7 days after You made the complaint; and
- investigate the complaint.

We will consult with any credit reporting body or credit provider that We consider necessary to investigate the complaint.

After investigating the complaint, We will give You a written notice about Our decision. If We are unable to give that notice within 30 days after You made the complaint, We will inform You of this within 30 days after You made the complaint and notify You of the reason for the delay, the expected timeframe to resolve the complaint and seek Your agreement to Us giving that notice at a later date.

To whom may We disclose credit information or credit eligibility information?

We may disclose credit information or credit eligibility information to entities both within and outside Australia (including entities without an Australian link within the meaning of the *Privacy Act*). Entities outside of Australia to whom We may disclose credit information or credit eligibility information are likely to be located in the Republic of India.

To which credit reporting bodies are We likely to disclose credit-related personal information?

The credit reporting bodies to which Vodafone is likely to disclose that information are:

- Dun & Bradstreet who can be contacted via clientservices@dnb.com.au or by calling Client Services on 13 23 33 during business hours Monday to Friday. That information is available to you without charge for 90 days following the date of this notice.
- Veda Advantage who can be contacted via www.mycreditfile.com.au or by calling 1300 921 621 during business hours Monday to Friday. That information is available to you without charge for 90 days following the date of this notice.

Those credit reporting bodies may include the information We disclose in reports provided to credit providers to assist them to assess Your credit worthiness. If You fail to meet Your payment obligations in relation to consumer credit, or commit a serious credit infringement, We may be entitled to disclose this to those credit reporting bodies.

Can You request a credit reporting body not to use or disclose credit reporting information?

You may request a credit reporting body:

- not to use credit reporting information they hold about You for the purposes of pre-screening of direct marketing by a credit provider; and
- 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.

How can You obtain this policy, or a credit reporting body's policy about its management of credit-related personal information?

You may obtain free of charge:

- a printable copy of this policy is available from Our website by printing this page or by emailing credit@vodafone.com.au;
- Dun and Bradstreet's policy about the management of credit-related personal information from their website at http://dnb.com.au/Header/About_Us/Legal/Privacy_policy/index.aspx;
- Veda Advantages policy about the management of credit-related personal information from their website at <http://www.veda.com.au/privacy>.