

Credit Reporting Data Management Policy

Metcash Limited ACN 112 073 480, its related bodies corporate and its related companies and its business pillars (collectively, “**Metcash**”, “**we**”, “**our**” or “**us**”) is committed to the protection of personal privacy within the scope of applicable law. This Credit Reporting Data Management (**CRDM**) Policy covers Metcash's collection, management and disclosure of credit information and credit eligibility information held by it and should be read in conjunction with our Privacy Policy. This CRDM Policy also addresses a number of matters required under the Credit Reporting Code of Conduct (for our Customers located in Australia) and the Credit Reporting Privacy Code 2004 (for our Customers located in New Zealand) (**CR Code**).

Metcash may update this CRDM Policy from time to time. The most current version will be located on the Metcash website at <http://www.metcash.com/footer/privacy-policy> and is also available by contacting our National Credit Manager by email or at the address detailed below.

Where we refer to the ‘Privacy Act’ in this Policy we mean, if you are located in Australia, the Privacy Act 1988 (Cth) and if you are located in New Zealand, the Privacy Act 1993 (NZ).

Types of Credit Information that Metcash collects and holds

The Privacy Act permits Metcash to collect and hold certain types of information.

The information Metcash collects includes:

- Identifying details such as your name, birth date, drivers licence number, address(es), telephone number(s) and other contact details.
- The type of credit offered and the terms of such credit (including when it was entered into, repayment, maximum amount of credit available and when it ceases).
- Any applicable repayment history.
- The type and amount of credit sought in an application to Metcash (or that you have offered to act as guarantor(s) in respect of the Trading Account arrangement).
- Payments of \$150 or more which become more than 60 days overdue.
- Advice that payments are no longer overdue.
- Whether credit terms or conditions have been varied, or new credit provided.
- Personal information (other than sensitive information) that has a credit-worthiness bearing and that we have used or may use in establishing credit eligibility.
- That in the opinion of Metcash you have committed a serious credit infringement in relation to consumer credit provided to you.
- That the credit provided to you by Metcash has been discharged.
- Any court judgment that relates to any credit that has been provided to, or applied for by, you.
- Any personal insolvency information about you (as defined in the Privacy Act).
- Publicly available information about you that relates to your activities in the country in which you reside and your creditworthiness.

The Privacy Act uses a variety of terms to refer to such information, however in this CRDM Policy we refer to it collectively as **Credit Information**.

Why Metcash collects, holds, uses and discloses your Credit Information

Metcash may collect, hold, use and disclose your Credit Information to:

- Assess an application for credit (by you, an entity associated by you, or as a guarantor).
- Verify your identity.
- Derive scores, ratings, summaries and evaluations relating to your credit worthiness.
- Manage credit we may provide (including in relation to specific offers).
- Participate in the credit reporting system and provide information to credit reporting bodies/credit reference agencies as permitted by the Privacy Act and the CR Code.

- Assist you to avoid defaulting on your credit-related obligations.
- A guarantor or someone you have indicated is a prospective guarantor.
- Collect overdue payments, undertake enforcement activities and deal with serious credit infringements (including in relation to guarantors).
- Exchanging information with credit providers which is permitted under the Privacy Act, including default information.
- Conduct fraud assessments.
- Manage our relationship with you and our internal processes and procedures.
- Assess whether to insure, or assess a risk of default, including in relation to trade insurers.
- Deal with complaints.
- Meet legal and regulatory requirements.

(Some Credit Information may be used or disclosed under the Privacy Act for some of these purposes, or in specific circumstances only).

How Metcash obtains Credit Information

Metcash obtains:

- credit reporting information about you from Veda, Creditor Watch, CreditWorks and Dun & Bradstreet (our Credit Reporting Bodies/Credit Reference Agencies).
- information about your commercial creditworthiness from businesses which provides information about commercial creditworthiness.
- Identifying details such as your name, birth date, drivers licence number, address(es), telephone number(s) from information that you provide to us (including your completed Application for Trading Account) or that is provided by third parties acting on your behalf.

Use of Trade Insurers

In relation to an application by your business for commercial credit, Metcash may ask a trade insurer to obtain credit reporting information about you for the purposes of assessing whether to insure or the risk of insuring Metcash or assessing the risk of default by your business and/or you in your capacity as Guarantor on the commercial Credit Application.

Other Uses of Credit Information

Credit Information obtained by Metcash may be used for credit related purposes and to notify Metcash's successor and assigns, financiers and/or any assignees or any lender to an assignee of Metcash's interests in any amount(s) payable arising under the Trading Terms between you or your business and Metcash from time to time.

How Metcash stores and protects personal information

Metcash stores personal credit information and credit eligibility information in a combination of computer storage facilities, paper-based files and other records. In so doing, we have taken numerous steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally Metcash takes reasonable steps to destroy or permanently de-identify personal information when we no longer need it and in accordance with the Privacy Act. The internet is not a secure method of transmitting information. Accordingly, other than where Metcash uses secure socket layer technology (SSL) to ensure information (such as credit card information) is securely transmitted and processed, Metcash cannot and does not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

How you can access your Credit Information

Metcash will take reasonable steps to make sure that the Credit Information we collect, use or disclose is accurate, complete and up to date. If your personal details change, such as your address or phone number, please contact our National Credit Manager by email or at the address detailed below.

At your request to the National Credit Manager, Metcash will provide you with a copy of any Credit Information which we hold about you, unless an exception under the *Privacy Act applies*. We may charge a fee for retrieving this information, in which case we will inform you of the fee and obtain your agreement to that fee before providing the information.

In accordance with the Privacy Act, Metcash will:

- Upon request, provide access to credit eligibility information within a reasonable timeframe.
- If access is refused and:
 - you are a Customer in Australia, Metcash will provide you with the contact details for the Office of the Australian Information Commissioner (**OAIC**) to enable you to escalate your request; or
 - you are a Customer in New Zealand, Metcash will provide you with the contact details for the Office of the Privacy Commissioner (**OPC**) to enable you to escalate your request.

How you can request the correction of your Credit Information

If you have accessed your Credit Information from Metcash or our Credit Reporting Bodies/Credit Reference Agencies and believe that it is not accurate, up to date, complete, irrelevant, or misleading, then you can request our National Credit Manager or Credit Reporting Bodies/Credit Reference Agencies to correct it.

Metcash will comply with the Privacy Act in relation to any request for the correction of your Credit Information.

In the course of the investigation process, we may consult with and disclose information to our Credit Reporting Bodies/Credit Reference Agencies and/or other Credit Providers. If our investigations reveal that your Credit Information does not require correction then we will advise you of this in writing and provide you with the contact details for the appropriate organisations to enable you to escalate your request.

How your Credit Information may impact your Application for a Trading Account

Metcash may refuse an Application for a Trading Account based wholly or partly on your Credit Information.

Metcash will comply with the Privacy Act in relation to any refusal for an Application for a Trading Account.

How to make a complaint

If you believe that Metcash or our Credit Reporting Bodies/Credit Reference Agencies has breached the CR Code or the Privacy Act or not taken reasonable steps to destroy Credit Information which is no longer relevant or required then you may complain using the contact details listed at the bottom of this document.

Metcash will deal with any complaints in accordance with the Privacy Act. In the course of investigating your complaint, Metcash may consult with and disclose information to our Credit Reporting Bodies/Credit Reference Agencies and/or other Credit Providers. If you are not satisfied with our response to your complaint then we will provide you with the contact details for the appropriate organizations to enable you to escalate your complaint

Metcash is committed to ensuring that we promptly acknowledge and investigate any complaint about the way we manage your credit Information.

How to contact the Credit Reporting Bodies/Credit Reference Agencies

You may contact our Credit Reporting Bodies/Credit Reference Agencies by using the following information. If you have any questions regarding your publicly held personal credit file then please contact Veda and Dun & Bradstreet as follows:-

Veda

Veda-Public Access

Website: www.mycreditfile.com.au

NB Veda is the primary Credit Reporting Body/Credit Reference Agency used by Metcash

Creditor Watch Pty Ltd

Admin@creditorwatch.com.au

1300 50 13 12

Dun & Bradstreet

D&B Public Access Centre:

Email PACAustral@dnb.com.au or call: 1300 734 806

Website: <https://www.checkyourcredit.com.au>

CreditWorks Data Solutions Limited

Level 1, 1 Ngaire Avenue
Newmarket
Auckland

P O Box 74 357
Market Road
Auckland

Ph 09 520 0626

How to contact Metcash

If you have any questions about this CRDM Policy, if you wish to update or correct information we hold about you or if you wish to make a complaint about our collection, use, management or disclosure of your personal information under this CRDM Policy then please, in the first instance, contact:

The National Credit Manager

Metcash Trading Limited

PO Box 557

Macquarie Park,

NSW 1670

Fax: (02) 9741 3430

E-mail: CreditReporting.DM@metcash.com

Metcash will take reasonable and prompt steps to remedy any issues resulting from our failure to comply with any of our obligations under this CDRM Policy and the associated Metcash Privacy Policy

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