

Credit Reporting Data Management Policy

Metcash Trading Limited (ABN 61 000 031 569), its related bodies corporate and its related companies and its business pillars (collectively, “**Metcash**”, “**we**”, “**our**” or “**us**”) are committed to the protection of personal privacy in accordance with all applicable laws. 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 available online at www.metcash.com/legal/privacy-policy. This CRDM Policy also addresses a number of matters required under the Privacy (Credit Reporting) Code (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 www.metcash.com/legal/credit-data-policy and is also available by contacting our National Credit Team 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 2020* (NZ).

Types of Credit Information that Metcash collects and holds

The credit reporting sections of the Privacy Act regulate Metcash’s handling of certain types of personal information relevant to credit. The Privacy Act uses a variety of terms to refer to such information, however in this CRDM Policy we refer to them collectively as “**Credit Information**”. The types of Credit Information Metcash collects and holds include:

- Identifying details such as your name, birth date, sex, drivers licence number, address(es) and employer.
- Information about consumer credit checks conducted about you with a credit reporting body (“**CRB**”), including who sought the check (i.e. which credit provider, insurer, etc) and the type and amount of credit sought in any related credit application.
- Certain information about payments which are more than 60 days overdue, including any new payment arrangements agreed and confirmation that the amounts have been paid.
- The opinion of any credit provider that you have committed a serious credit infringement in relation to consumer credit provided to you (e.g. fraud or intention to avoid credit obligations). We may report this information to CRBs.
- Any court judgment that relates to any credit that has been provided to, or applied for by, you.
- Certain personal insolvency information about you from the National Personal Insolvency Index.
- Publicly available information that relates to your Australian activities and your credit worthiness.
- Information derived by CRBs or us from other Credit Information, e.g. scores, ratings, summaries and evaluations relating to your credit worthiness.

We also collect and hold personal information that relates to credit but is outside the categories above. We may handle that information as described in our Privacy Policy and also in the ways we handle Credit Information as described in this CRDM Policy.

Some of our customers are not individuals (for example, they are companies). We also collect and hold information relating to credit about those customers and may handle that information in the ways we handle Credit Information as described in this CRDM Policy, for managing our business and credit risk, for participating in credit reporting activities and as otherwise permitted by law.

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

Metcash may collect, hold, use and disclose your Credit Information to, where permitted by law:

- Assess an application for credit or to be a guarantor.

- Verify your identity.
- Derive scores, ratings, summaries and evaluations relating to your credit worthiness.
- Manage and administer credit we may provide (including in relation to specific offers), and any associated guarantee.
- Participate in the credit reporting system and provide information to CRBs, who may include Credit Information in reports they give to credit providers about your credit worthiness.
- Assist you to avoid defaulting on your credit-related obligations.
- Collect overdue payments, undertake enforcement activities and deal with serious credit infringements (including in relation to guarantors).
- 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.
- Facilitate any company mergers, acquisitions and investments involving us.
- Share that information with other credit providers, and collect it from them, for us and/or them to fulfill any of the purposes above.

(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 may collect Credit Information in different ways, including:

- Where you provide it to us directly, for example in a completed Application for Trading Account. This may include your identifying details such as your name, birth date, drivers licence number and address(es).
- From third parties acting on your behalf, such as your agents and representatives.
- From CRBs (see details below) and other credit providers.
- By creating new Credit Information from other Credit Information, for example scores, ratings, summaries and evaluations relating to your credit worthiness.

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 successors, 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 Credit Information

Metcash stores Credit 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 Credit Information from misuse, interference and loss, and unauthorised access, modification or disclosure. Those steps include, depending on the circumstances, encryption, data access controls, secure buildings and repositories, and contractual protections.

Despite the steps we take, there are always risks when using the internet to transmit information. To the extent permitted by law, Metcash does not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access to or use of that information.

How you can access or correct your Credit Information

Metcash will take reasonable steps in accordance with all applicable laws 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 Team by email or at the address detailed below.

At your request to the National Credit Team, Metcash will enable you to access or correct 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 or correction of Credit Information within a reasonable timeframe.
- If access or correction 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.

In the course of the investigation process relating to a correction request, we may consult with and disclose information to our CRBs and/or other credit providers.

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 has breached the CR Code or the Privacy Act then you may complain using the contact details listed at the bottom of this document.

Metcash will deal with any such complaints in accordance with the Privacy Act. In the course of investigating your complaint, Metcash may consult with and disclose information to our CRBs 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 bodies 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.

If you would like to get in touch about an issue that is not credit or privacy related, please do not use the contact details given below, but rather visit www.metcash.com/contact to find the appropriate contact details.

How to contact the Credit Reporting Bodies

You may contact our CRBs by using the following information. If you have any questions regarding your publicly held personal credit file then please contact them as follows:-

Equifax Australia

Website: www.equifax.com.au/personal

Phone: 13 8332

NB Equifax is the primary CRB used by Metcash.

Creditor Watch Pty Ltd

Website: creditorwatch.com.au

Email: Admin@creditorwatch.com.au

Phone: 1300 50 13 12

Illion

Email: pac.austral@illion.com.au

Phone: 1300 734 806

Website: www.creditcheck.illion.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

In certain circumstances you can request CRBs to:

- not use Credit Information to determine your eligibility for direct marketing by a credit provider; and
- not use or disclose Credit Information for a period if you think you have been a victim of fraud.

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 Team
c/o – Metcash Privacy Officer
Metcash Trading Limited
PO Box 557
Macquarie Park, NSW 1670

Fax: (02) 9741 3430

E-mail: privacy@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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