Metcash Group – Credit Reporting Data Management Policy

Last update: July 2026

1. Introduction

This Metcash Group – Credit Reporting Data Management Policy (**CRDM Policy**) explains how Metcash Trading Limited (ABN 61 000 031 569) and its related bodies corporate (collectively, **Metcash**, **we**, **our** or **us**) collect, use, disclose, hold and protect credit information and credit eligibility information in accordance with the *Privacy Act 1988* (Cth) (**Australian Privacy Act**) (where you are based in Australia), or the *Privacy Act 2020* (NZ) (**New Zealand Privacy Act**) (where you are based in New Zealand), as well as any applicable codes (such as the Privacy (Credit Reporting) Code (applicable in Australia) and Credit Reporting Privacy Code 2020 (applicable in New Zealand)).

This CRDM Policy should be read in conjunction with the Metcash Group – General Privacy Policy and any applicable privacy notices that are referenced or shown to you when personal information is collected about you for specific purposes.

Please note that the handling of personal information by third parties as contemplated in this CRDM Policy will generally be subject to the privacy policies of those third parties.

Metcash may update this CRDM Policy from time to time. The most current version will be made available on our website or can be obtained by contacting our Group Privacy Officer (please see contact details under section 9 below).

2. Definitions

There are terms used in this CRDM Policy that have a specific meaning as follows:

Credit eligibility information	Information primarily related to your credit-related dealings with other credit providers and includes credit reporting information disclosed by a credit reporting body to Metcash, and information we derive from that information.
Credit information	Personal information that may have a bearing on credit that has been provided to you or that you have applied for and information we derive from that information.
Credit-related information	Credit information and credit eligibility information.
Information request	Where we request information about you from a credit reporting body in connection with our credit related products or service, including if you will be a guarantor.
Personal information	Information or an opinion about an identified individual or from which an individual can reasonably be identified.

Team Members	Officers and directors of Metcash, workers engaged by Metcash including employees and independent contractors, labour hire staff, other individuals who are otherwise performing work for the benefit of Metcash who are issued Metcash provided devices and/or email and other individuals that a relevant privacy notice indicates the Metcash Group – Team Members Privacy Policy will apply to.

3. What credit-related information we collect and how we collect it

(a) Collection from you

We collect your credit-related information from you in various circumstances such as those outlined below:

Circumstances of collection	Examples of what we collect
When you apply for a trading account or credit facility with Metcash	Your name, contact details, date of birth, address, identity information (e.g. driver's licence), financial information (which may include details of other accounts you hold and associated credit limits), bank account details, the type of product and amount of credit you have applied for, and other information required by our form of application for a trading account or credit facility.
When your payments are overdue	Any agreed payment arrangements or confirmation that amounts have been paid.

If you do not provide requested information we may not be able to provide you with a trading account or credit facility or facilitate alternative payment arrangements.

Where you provide us with information of third parties, you must ensure that they are aware of the terms of the Metcash Group – General Privacy Policy and this CRDM Policy.

(b) Collection from parties other than you

We collect your credit-related information from third parties in certain circumstances including when:

- a third party is applying for a trading account with Metcash on your behalf; and/or
- we conduct identify verification or credit assessments as part of your application for a trading account or credit facility and assess your creditworthiness, such as from credit reporting bodies (**CRBs**) and other credit providers,

For example, this information may include:

- who has sought credit checks with a CRB about you;
- the type and amount of credit sought in any related credit application;
- default and repayment history;
- history of the types and amounts of credit you have sought and previous information requests to credit reporting bodies;

- details of your consumer credit liability, including details of your other credit providers and the terms of those arrangements;
- insolvency or financial hardship information;
- information about defaults;
- opinions of any credit provider that you have committed a serious credit infringement in relation to consumer credit provided to you (which we may disclose to CRBs);
- information about you from our service providers involved in helping us to assess applications and bodies that issue identification documents to help us check your identity;
- information about you from publicly available sources (such as court judgments or personal insolvency information);
- credit reporting information about you from trade insurers, to assess whether to insure you or the risk of default by your business and/or your capacity as a gurarantor in relation to a credit application; and
- information from other parties to locate or identify debtors (or potential debtors) and understand your credit and payment behaviours.

We also derive and generate information from credit-related information we collect or hold about you, including through analyses of your eligibility for credit, credit scores, credit risk assessments, ratings and summaries and evaluations relating to your creditworthiness or likeliness of default.

Derived information can include credit risk scores or ratings which indicate the likelihood of repayment, lending or risk tier classifications, probability of default or delinquency indicators, behavioural risk flags, recommended credit limits or lending amounts based on financial history and repayment behaviour and payment trends.

4. Why we collect, hold, use and disclose your credit-related information

Subject to any restrictions at law, such as those regarding use and disclosure of credit eligibility information, we collect, hold, use and disclose your credit-related information to manage our business, including for the following purposes:

Purposes	**Examples of why we collect, use and disclose personal information**
Managing applications for trading accounts and credit facilities and relationships with holders of such trading accounts and credit facilities	• confirming your identity; • assessing applications for trading accounts and credit facilities, or to be a guarantor (including understanding credit and payment behaviours) • deriving scores, ratings, summaries and evaluations relating to your creditworthiness; • managing and administering our provision of credit and any associated guarantees; • helping you avoid defaulting on your credit-related obligations and otherwise manage those obligations; • collecting overdue payments, identifying, locating and dealing with debtors (or potential debtors), undertaking

	enforcement activities and dealing with credit infringements (including in relation to guarantors); • assessing whether to insure, or assess a risk of default, including in relation to trade insurers; and • responding to queries, complaints and feedback.
Participating in credit reporting activities	• providing information to CRBs, who may include credit-related information in reports they give to credit providers about your creditworthiness; and • participating in credit reporting activities.
Protecting people, assets (including data) and our business	• managing and preventing theft, fraud, misconduct, and criminal activity (including through conducting fraud assessments); • protecting information that we hold; • managing the safety and security of our people and assets (including data); and • training Team Members, Metcash retailers and suppliers.
Complying with laws and regulations and other applicable requirements, and obtaining advice	• conducting identity verification and relevant checks (e.g. Know-Your-Customer checks); • complying with court orders or subpoenas; • obtaining professional advice (e.g. legal, accounting, auditing or consulting advice); and • training Team Members.
Managing administrative matters	• managing retention and storage of data (including with third party service providers); and • supporting corporate transactions (e.g. mergers and acquisitions), which, for example, may include disclosure to proposed or actual purchasers of our business or assets.

We may also de-identify and/or aggregate personal information, and use and disclose the de-identified and/or aggregated data for any purpose.

In addition, we also collect, hold, use and disclose your credit-related information for other purposes permitted by law or as outlined in relevant notices or as disclosed to you from time to time.

5. Who we disclose your credit-related information to, and overseas disclosures

We disclose your credit-information to:

- related companies and members of the Metcash group (including Team Members);
- CRBs - this information (including default information and repayment history) may be held by the relevant CRB on its system and accessed by other customers of the CRB in connection with its credit reporting services;
- credit providers;

- any of our successors, financiers and/or assignees or any lender to an assignee of Metcash's interests in any amounts payable arising under the trading terms between you or your business and Metcash from time to time; and
- other third parties for purposes described above in section 4 ("*Why we collect, hold, use and disclose your credit-related information*") or data storage purposes. Such third parties may include service providers, professional advisors, suppliers, trade insurers, regulatory authorities, enforcement bodies, government agencies, or parties to relevant corporate transactions.

We take reasonable steps to ensure privacy and security protections are in place.

We also disclose your personal information when required by law (for example, in response to a subpoena or to comply with security regulations).

We are likely to disclose your credit-related information to entities located overseas. Overseas disclosures will most likely be to the following countries: Australia and United States (where you are based in New Zealand).

6. Contact details of credit reporting bodies

The CRBs we use, and their contact details are set out below.

CRB	Phone	Email	Website
Equifax (This is the primary CRB used by Metcash)	AU: 138 332 NZ: 0800 698 332		AU: www.equifax.com.au/personal NZ: www.equifax.co.nz
Creditor Watch Pty Ltd	1300 501 312	admin@creditorwatch.com.au	www.creditorwatch.com.au
Experian	1300 783 684		www.experian.com.au
CreditWorks Data Solutions Limited	09 520 0626	enquiries@creditworks.co.nz	www.creditworks.co.nz/contact

For further information about how these CRBs manage credit-related information, please see their privacy and credit reporting policies available on their websites.

Please note that in certain circumstances, you can request CRBs to:

- not use credit-related information to determine your eligibility for direct marketing by a credit provider (including Metcash); and
- not use or disclose credit-related information, if you reasonably believe that you have been or are likely to be, a victim of fraud.

7. Information requests and other important information to be aware of

Where we disclose your personal information as part of an information request to a credit reporting body:

- your consent to that disclosure is not required;
- a record of the information request may be used and, as relevant, disclosed for the purposes of the credit reporting body or a credit provider assessing your creditworthiness, including calculation of a credit score or credit rating (subject to any other use or disclosure limitations under the Australian Privacy Act (where you are based in Australia), New Zealand Privacy Act (where you are based in New Zealand), or associated regulations or the Credit Reporting Code); and
- the information request may affect your credit score or credit rating calculated by a credit reporting body. For example, this could reduce your credit score or credit rating.

As stated above in section 5 ("*Who we disclose your credit-related information to, and overseas disclosures*"), we may provide credit information to credit reporting bodies. In this context, it is important to highlight that:

- if you fail to meet your payment obligations in relation to consumer credit or commit a serious credit infringement, we may disclose this to the credit reporting body; and
- the credit reporting body may include the information we provide in reports provided to credit providers to assist them to assess your creditworthiness.

8. How we hold and protect your credit-related information

We take reasonable steps to ensure the security of all credit-related information held by Metcash.

Security measures include encryption, access controls, and secure disposal or, where permitted by law, de-identification.

9. Access, correction, queries and complaints

You have the right to request access to your credit eligibility information or correction of your credit-related information, or to complain about a failure by Metcash to comply with the Australian Privacy Act (where you are based in Australia), New Zealand Privacy Act (where you are based in New Zealand) or relevant credit reporting codes.

To seek access to or correction of your personal information, submit a privacy query or complain about a privacy issue, please contact:

> Group Privacy Officer, Metcash Trading Limited
> Email: privacy@metcash.com

We seek to acknowledge and investigate within a reasonable time, any complaint about the way we handle personal information.

We may consult with and disclose your credit-related information to our CRBs and/or other credit providers in the course of managing your complaint or access request. We may also advise them of any corrections.

If we have not resolved your privacy complaint or responded to your satisfaction, you can also lodge a complaint to the Office of the Australian Information Commissioner at enquiries@oaic.gov.au or www.oaic.gov.au, or, if your complaint relates to our handling of your personal information under New Zealand law, to the Office of the Privacy Commissioner (New Zealand) by calling 0800 803 909 or through www.privacy.org.nz.

If the complaint relates to credit reporting matters in Australia, you may also lodge a dispute with the Australian Financial Complaints Authority (AFCA) at www.afca.org.au, info@afca.org.au or by calling 1800 931 678.

For any complaints relating to Metcash that do not relate to this Privacy Policy, please find the relevant contact details here.