

Australian Credit Reporting Policy



1. Purpose

The purpose of this Policy is to set out how we collect, use, disclose and protect the privacy of credit-related Personal Information.

We comply with the credit reporting provisions in Part IIIA of the Privacy Act, as well as the CR Code.

2. Scope

This Policy applies to BlueScope, its affiliates and related entities if the organisation is a Credit Provider.

3. References

Ref 1 *Australian Privacy Policy*

4. Definitions

CR Code	means the <i>Privacy (Credit Reporting) Code 2014 (Cth)</i> .
credit-related Personal Information	has the meaning given to that term in the CR Code and includes credit information, credit eligibility information and CRB derived information as those terms are defined in the Privacy Act.
Credit Provider	is relevantly, but among other things, an organisation that supplies goods and services where payment is deferred for 7 days or more. A full definition of a Credit Provider can be found in the Privacy Act.
Personal Information	is information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. For example, this may include your name, age, gender, postcode and contact details as well as financial information.

5. How we collect credit-related Personal Information

We collect credit-related Personal Information through your dealings with us in applying for a commercial trading account, assessing credit limit requirements and continued trade requirements. We also collect credit-related Personal Information from credit reporting bodies such as illion and Equifax and commercial credit check providers such as National Credit Insurance Trade Credit Solutions (**NCI**).

6. Types of credit-related Personal Information we collect, hold, use and disclose

The kinds of credit-related Personal Information we may collect, hold, use, and disclose include:

- your name, sex, address (and previous two addresses), date of birth, name of employer, and driver's licence number;
- the fact we or another Credit Provider are or have been a Credit Provider to you, certain terms of the credit contract (including the maximum amount available and the repayment terms), the date you entered into the credit contract, and the date that the credit contract was terminated or otherwise ceases;
- whether or not you have made payments due and payable in relation to credit provided by us or another Credit Provider, the day on which the payment is due and payable, and the date when any overdue payments were made;
- the fact that you have applied for credit (including the type, amount and name of the Credit Provider), and the fact that a Credit Provider has accessed your credit reporting file from a credit reporting body to assess your credit application;
- any overdue payments of \$150 or more owed to us or another Credit Provider that are overdue by more than 60 days and for which debt collection has started, and if you subsequently repay such overdue payment, the fact of that repayment;
- where you have been in default, the amount which was overdue;
- that we or another Credit Provider have entered into an arrangement to vary your original credit contract or that you have been provided with a new credit contract;
- information about you that is entered or recorded in the National Personal Insolvency Index; and
- certain publicly available information that relates to your activities in Australia and your creditworthiness;
- information that, in our or another Credit Provider's opinion, you have committed a serious credit infringement (that is, acted fraudulently or shown an intention not to comply with your credit obligations);
- assessments, evaluations, scores, ratings, summaries, and other information relating to your credit worthiness which is derived by the credit reporting body or us or other Credit Providers wholly or partly based on the above; and
- administrative information relating to credit provided by us including your account and customer number.

7. How we hold your credit-related Personal Information

We hold your credit-related Personal Information in both physical and electronic form on our system and on the systems of our service providers. We take the same safeguards in managing your credit-related Personal Information as we do with all other Personal Information about you according to our Australian Privacy Policy (<http://www.bluescope.com/privacy-policy>).

8. Why we collect, hold, use, and disclose your credit-related Personal Information

We collect, hold, use and disclose your credit-related Personal Information as reasonably necessary for our business purposes and as permitted by law, which include:

- to assess as to whether we will provide you with credit; and/or
- to derive assessments, evaluations, scores, ratings, summaries relating to your credit worthiness that we use in our decision-making processes; and/or
- for the ongoing review and management of your credit account with us including to assist you to avoid defaulting on your credit obligations; and/or

- to participate in the credit reporting system; and/or
- to undertake debt recovery and enforcement activities; and/or
- to deal with serious credit infringements.

9. Disclosure of credit-related Personal Information to and use by a credit reporting body

We may disclose your credit-related Personal Information to credit reporting bodies. At the time this Policy was released, we may use illion and Equifax for the following purposes:

- for us to obtain a credit report about you; and/or
- for the credit reporting body to use the information in carrying on its credit reporting business, including to create or maintain a credit reporting information file about you; and/or
- for the credit reporting body to include such information in reports provided to us or other Credit Providers to assist them to assess your credit worthiness.

If you fail to meet your payment obligations in relation to a credit contract or commit a serious credit infringement, we may be entitled to disclose this to the credit reporting bodies.

You have a right to request illion and Equifax not to use such information for the purposes of pre-screening of direct marketing by us and not to use or disclose such information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

You may obtain a copy of the credit reporting policies of illion and Equifax by visiting their websites or contacting them as follows:

Name	illion
By telephone:	13 23 33 or +61 3 9828 3200
Website:	https://www.illion.com.au/contact-us/

Name	Equifax Pty Ltd
By telephone:	13 8332
Website:	https://www.equifax.com.au/contact

We also disclose information to companies who provide similar commercial credit check services, in relation to businesses (which may be companies and not individuals). The commercial credit check providers that we deal with (including their contact details and how to find their applicable policies) are:

Name	National Credit Insurance (Brokers) Pty Ltd (NCI)
By telephone:	1800 882 820
Website:	https://nci.com.au/contact-us/

10. Disclosure of credit-related Personal Information to an overseas recipient

We contract with service providers located overseas to perform certain functions on our behalf. We may disclose your credit-related Personal Information to our service providers, but their access is limited only to information needed for them to perform their functions. Our current service providers may be located in one or more overseas countries or hold this information in overseas countries, including in India.

11. Access to your credit-related Personal Information

You have special rights to access your credit-related Personal Information held by us. You can contact us on the contact details below to make an access request. We will provide you with access within 30 days, unless we have grounds to refuse your request. If we require longer time to respond to your request, we will let you know.

If we refuse your request, we will provide you with a notice explaining our decision and how you can complain about our decision. There is no charge for making a request for access to your credit-related Personal Information.

12. Correction of your credit-related Personal Information

If you believe that any credit-related Personal Information about you held by us is incorrect, you have a right to request us to correct that information. You can contact us on the contact details below to make a correction request. We will try to resolve your request within 30 days. If we require longer to respond to your request, we will let you know.

If we do not agree with your correction request, we will provide you with a notice explaining our decision and how you can complain about our decision. There is no charge for making a correction request or for the correction of your credit-related Personal Information.

13. Complaints

If you believe that we may not have complied with our obligations under the Privacy Act or the CR Code, or you wish to make a complaint about the way we have handled your credit-related Personal Information, you can contact us through the contact details below. Please include your name, email address and/or telephone number and clearly describe your complaint. You will receive an acknowledgement of your complaint within 7 days.

We will investigate your complaint and will use reasonable endeavours to respond to you in writing within 30 days of receiving your complaint (or a longer period with your agreement). If we fail to respond to your complaint or if you are not satisfied with the way your complaint is being handled, you may have the right to make a complaint to the Office of the Australian Information Commissioner.

The Office of the Australian Information Commissioner can be contacted using the details set out below:

Online Complaints: Through the Privacy Complaint Form located at
https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC

Online Enquiries: Through the Enquiries Form located at
https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=APC_ENQ

Post: GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992 (Monday–Thursday, 10am–4pm AEST/AEDT)

14. Contacting Us

If you have any questions about our Credit Reporting Policy or any concerns or a complaint regarding how we handle your credit-related Personal Information, please contact BlueScope at privacyquestions@bluescope.com.

We value inclusion and encourage our People to share their ideas and feedback.

We are committed to fostering a culture of speaking up when something isn't right. If you see something that is not consistent with Our Bond, our Code of Conduct – How We Work or any Guiding Document including this Policy, you should speak up.

If you wish to speak up, raise a concern or complaint or seek further advice you should speak with your manager or your local People or Ethics & Compliance representative, send an email to ethics@bluescope.com or contact BlueScope's externally managed confidential hotline at www.bluescopespeakup.deloitte.com.au or by email bluescopespeakup@deloitte.com.au.

For further information please see BlueScope's Speak Up Policy.