



CREDIT REPORTING POLICY

Scope of Policy and Source of Obligation

Covenant College, as a supplier of goods and services on credit or payment terms, is a “credit provider” under the Privacy Act 1988 (Cth) (Privacy Act). Covenant College offers payment options for the deferred payment of school fees to parents and guardians of Covenant College students. For example, payment by instalment.

As a credit provider, Covenant College is required by Part IIIA of the Privacy Act to have a policy dealing with how Covenant College manages your personal credit information and credit eligibility information (Credit-Related Information). Covenant College must also comply with the Privacy (Credit Reporting) Code 2014 (Version 1.2) (CR Code), registered under the Privacy Act. You should read this policy in conjunction with our Privacy Policy.

Scope of policy

This policy outlines the circumstances in which we obtain Credit Related Information, how we use that information and how we manage requests to access and/or change that information.

Accessibility of policy

A PDF version of this policy is also published on the Covenant College website.

What is Credit-Related Information and what types of Credit-Related Information do we collect?

Credit-Related Information includes:

- Identification information about an individual (e.g. consumer credit liability information, repayment history information, default information); and
- Credit reporting information from a credit reporting body (CRB).

The types of Credit-Related Information Covenant College collects includes:

- The type and amount of credit information you have obtained and the terms upon which it was obtained.
- Repayment history information and default information.
- Whether, in the Covenant College's name or another credit provider's opinion, you have committed a serious credit infringement.
- Court proceedings information.
- Certain administrative information relating to credit.

How do we Collect Credit-Related Information?

Covenant College collects Credit-Related Information in order to assess your eligibility to obtain goods and/or services from Covenant College on credit terms.

Depending on the type of information we are collecting, Covenant College may have already collected some Credit-Related Information about an individual in the form of personal information (e.g. name, address, date of birth). The personal information becomes Credit-Related Information once the client obtains credit from Covenant College, but only for the purposes of that credit transaction.

Where possible, Covenant College will use existing information we hold about an individual before collecting further information.

If Covenant College is required to collect Credit-Related Information under an Australian law or a court/tribunal order, Covenant College will inform you that the collection is required, including details of the law or court/tribunal order requiring the collection.

Where Covenant College requires additional Credit-Related Information, we will collect the information directly from the individual including by using a specially designed form (e.g. application form) or by email, over the telephone or in face to face meetings.

Covenant College will also collect Credit-Related Information from other people including:

- representatives of an individual (e.g. their employer, accountant, lawyer); and
- CRBs and other credit providers.

Covenant College may collect publicly available information in relation to an individual's activities in Australia and their credit worthiness.

How do we use Credit-Related Information?

We may collect, hold, use and disclose Credit-Related Information in order to:

- assess an application for credit (flexible payment option);
- assess creditworthiness;
- determine payment terms for the goods and/or services Covenant College provides;
- day to day administration;
- satisfy Covenant College's legal obligations.

Covenant College may not be able to enrol, or continue the enrolment of, a student if necessary Credit-Related Information about the student, parent or guardian is not provided.

How do we store Credit-Related Information?

Covenant College may store Credit-Related Information in a variety of formats including, but not limited to:

- databases;
- hard copy files;
- personal devices, including laptop computers;
- third party storage providers such as cloud storage facilities; and
- paper based files.

The security of client Credit-Related Information is important to us and we will take all reasonable steps to protect Credit-Related Information from misuse, interference, loss, unauthorised access, modification or disclosure.

These steps include, but are not limited to:

- Restricting access and user privilege of information by staff depending on their role and responsibilities.
- Ensuring staff do not share personal passwords.
- Ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.
- Ensuring access to Covenant College's premises are secured at all times.
- Implementing physical security measures around the school buildings and grounds to prevent break-ins.
- Ensuring our IT and cyber security systems, policies and procedures are implemented and up to date.
- Ensuring staff comply with internal policies and procedures when handling the information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers,

to ensure as far as practicable that they are compliant with to ensure as far as practicable that they are compliant with Part IIIA of the Privacy Act, or a similar privacy regime.

- The destruction, deletion or de-identification of personal information we hold that is no longer needed, or required to be retained by any other laws.

Disclosure of Credit-Related Information

Covenant College may disclose Credit-Related Information (including default information) about you to CRBs and debt collection bodies where you are in payment default.

The types of Credit-Related Information we may disclose to CRBs include:

- identification information, such as your name, address and date of birth; and
- information that you have defaulted on payment due to Covenant College and the amount of the default.

Subject to the above, Covenant College will not disclose Credit-Related Information about you except where it is:

- in accordance with the law;
- authorised by you in contract between you and Covenant College; or
- in accordance with consent granted by you.

Access and Correction of Credit-Related Information

Under the Privacy Act, and the CR Code, all individuals are entitled to access their Credit Related Information which we hold, and to have such information amended if necessary and appropriate.

Access and Fees

An individual may contact Covenant College and submit a request in writing for access to their Credit Related Information. Such access shall not be denied subject to limited situations. The individual may be asked to prove their identity by the production of a passport, driving licence, or other form of photo identification as deemed necessary.

Upon receipt of a request for access, we will endeavour to respond to the request within a reasonable period. Access will be denied if it unlawful or likely to prejudice enforcement investigations.

The School does not charge a fee to access your Credit-Related Information.

Correction and Fees

An individual may contact the Covenant College and submit a request in writing to correct Credit Related Information which we hold. Upon receipt of such a request, we will deal with the corrections and inform the individual of the outcome within thirty (30) days.

If we become aware of incorrect Credit Related Personal Information which we hold without any request

being received, we shall take reasonable steps to correct the information insofar as is necessary and appropriate. A written notice of correction will be supplied to the individual within a reasonable period of time.

If we are unable to grant access and/or correction, we will provide the individual with written notice of our decision including the reasons for denying the requests and substantive evidence.

The School does not charge a fee for correction requests.

Disclosure to Overseas Recipients

We may disclose Credit-Related Information about a client to overseas recipients in certain circumstances, such as when we are storing information with a 'cloud services provider' which stores data outside of Australia.

We will however take all reasonable steps not to disclose a client's Credit-Related Information to overseas recipients unless we:

- have the client's consent (which may be implied);
- have satisfied ourselves that the overseas recipient is compliant with the Credit Reporting provisions of Part IIIA of the Privacy Act, or a similar privacy regime;
- form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

Locations outside of Australia which may receive Credit-Related Information from us include.

Complaints

An individual can make a complaint about how Covenant College manages their Credit-Related Information by notifying us in writing as soon as possible. We will acknowledge receipt of the complaint within seven (7) days of its receipt. We will provide a response to the complaint in writing within thirty (30) days of receiving the initial complaint.

Covenant College does not charge a fee for complaints handling.

If the individual is not satisfied with the outcome of the complaint, the individual can complain to the Office of the Australian Information Commissioner (OAIC). A referral to the OAIC should be a last resort once all other avenues of resolution have been exhausted.

How to contact us

Covenant College can be contacted about this Credit Reporting Policy or about personal information generally, by:

- Emailing administration@covenant.vic.edu.au
- Calling 03 5278 5122
- Writing to our Privacy Officer at 105 Creamery Rd Bell Post Hill 3215.

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

Changes to our privacy and credit information handling practices

This Credit Reporting Policy is subject to change at any time. Please check our Credit Reporting Policy on our website www.covenant.vic.edu.au regularly for any changes.