

CREDIT INFORMATION MANAGEMENT POLICY

Kehoe Myers Consulting Engineers Pty Ltd ACN 011 061 582 (**Kehoe Myers**) are Professional Consulting Engineers. We specialise in Civil, Structural and Hydraulic engineering services. Kehoe Myers provide Consulting Engineering Services to clients throughout Australia with offices in Toowoomba, Ipswich and Roma.

Kehoe Myers is committed to protecting the privacy of your personal credit information. This policy explains how we handle your credit information when we collect it from you and should be read in conjunction with our Privacy Policy. Our management of this information is governed by the *Privacy Act 1988* (Cth) (**Privacy Act**), the *Privacy Regulation 2013* and the *Credit Reporting Privacy Code* (**CR Code**).

Under the Privacy Act, if you engage our services you are viewed as applying for credit from us, in the form of us providing services to you and allowing you more than seven days to pay the debt for such services.

Types of Credit Information that we collect and hold

The Privacy Act permits Kehoe Myers to collect and hold certain types of credit information and credit eligibility information. This information includes:

- identifying details such as your name, birth date, driver's licence number, address, 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 by you (which will be the payment terms offered to you by Kehoe Myers);
- 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 our opinion you have committed a serious credit infringement in relation to consumer credit provided to you;
- that the credit provided to you by us 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); and
- publicly available information about you that relates to your activities in Australia and your credit worthiness.

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

Why we collect, hold, use and disclose your Credit Information

Kehoe Myers 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) - please note that we may refuse to offer our services to you or may alter our payment terms based wholly or partly on your Credit Information. We will comply with the Privacy Act in relation to any refusal or alteration of our terms;
- 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 as permitted by Part IIIA of 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);
- exchange information with credit providers (as that term is defined in the Privacy Act) which is permitted under the Privacy Act, including default information;
- conduct fraud assessments;
- manage our relationship with you and our internal processes and procedures;
- deal with complaints;
- meet legal and regulatory requirements; and
- notify Kehoe Myers's successor and assigns, financiers and/or any assignees or any lender to an assignee of our interests in any amounts payable by you to us from time to time.

We note that some Credit Information may be used or disclosed under the Privacy Act for some of these purposes, or in specific circumstances only.

How Kehoe Myers obtains Credit Information

Kehoe Myers collects Credit Information in several ways, including:

- directly from you – this can be collected by all forms of written communications, via our website or verbally asking you for that information over the telephone or in person;
- from a third party – Other consultants to complete a part of the works you require for your project, another principal consultant, financial institution or government departments; and
- from our credit reporting bodies.

What kinds of information do we derive from credit reporting information?

From the credit reporting information disclosed to Kehoe Myers by a credit reporting body, we may derive certain information, such as a credit score calculated from credit reporting information or information regarding your reliability in repaying debts.

Data quality and security of Credit Information collected

Kehoe Myers will take reasonable steps to store Credit Information in a secure manner, protected by a combination of physical and technical measures. Credit Information that we store in hard copy is stored securely within our business premises. Credit Information that we store electronically is stored on our computer servers which are located within secure premises and on portable hard drives which are transported securely if they are taken outside of the business premises and stored in another secure location.

We will take all reasonable steps to protect the security of your Credit Information held by us. This includes appropriate technology to protect Credit Information stored electronically, as well as limiting the number of Kehoe Myers personnel who have access to information stored in hard copy format.

Despite our reasonable efforts, we cannot guarantee that the security of your Credit Information will not be breached, therefore, to the fullest extent permitted by law, we disclaim all liability any responsibility for any damage you may suffer due to any loss, unauthorised access, misuse or alteration of any Credit Information we collect.

Transfer of Credit Information

Kehoe Myers outsources certain business functions to other organisations. Your Credit Information may, as required from time to time, be disclosed or transferred to other organisations to allow them to assist Kehoe Myers to provide you with services. Other entities that your personal information is usually disclosed to include:

- Other specialist consultants directly linked to your project
- Financial services
- Insurance Companies directly linked to your project
- Auditors
- Government, regulators, law enforcement authorities, organisations as required or authorised by law
- Credit reporting bodies

It is unlikely that Kehoe Myers will disclose your Credit Information to overseas recipients. If Kehoe Myers transfers your Credit Information outside Australia, we will comply with requirements of the Act that relate to transborder data flows. The entities to which we may disclose your Credit Information may also transfer your Credit Information outside Australia. We are unable to say what countries, if any, those recipients are likely to be located in.

Access and correction of your Credit Information

You can access Credit Information we hold about you. Please contact Kehoe Myers if you would like to access or correct the Credit Information that we hold about you. You can access your Credit Information, subject to some exceptions allowed by law, by putting your request in writing to our Toowoomba Head Office.

Complaints

You have a right to complain about our handling of your Credit Information if you believe that we have interfered with your privacy. If you are making a complaint about our handling of your Credit Information, we invite you to provide written details of your complaint to our Privacy Officer at kmce@kehoemyers.com.au or by post to 124 Russell Street, Toowoomba Q 4350.

Our Privacy Officer will contact you within 14 days of the date we receive the written details of your complaint to acknowledge that we have received it. Our Privacy Officer will then:

1. review of the way we dealt with your Credit Information;
2. conduct an internal investigation (if necessary) into how your Credit Information came to be handled in the way that it was; and
3. provide a report to you within one month of the date we acknowledged receipt of your complaint.

If you believe we have breached the APPs you may also lodge a complaint with the Office of the Australian Information Commissioner.