

## CREDIT REPORTING POLICY

This policy is applicable to any individual (**you**) who applies for credit from, or holds a credit product with, MSCI Australia Pty Ltd ACN 133 293 642 (**us/we/our**). This policy provides information about our management of credit-related information.

In this policy **credit-related information** means:

- **credit information**, which is information about you which may be one or more of information about your identity; the type, terms and maximum amount of credit that has been provided to you; information about when that credit was provided and when it was repaid; repayment history information; default information (including overdue payments); payment information; new arrangement information; details of any serious credit infringements; court proceedings information; personal insolvency information and publicly available information; and
- **credit eligibility information**, which is credit reporting information supplied to us by a credit reporting body, and any information that we derive from it.

### Why do we need to collect your credit-related information?

We collect credit-related information about you to enable us to assess your application for finance, and to manage your finance contract with us. We may also use your credit-related information to manage our relationship with you.

The kinds of credit-related information we may collect about you may include your name, date of birth, address, bank account details, occupation, and any other credit-related information we may need about you.

### How do we collect your credit-related information?

Where reasonable and practical we will collect your credit information directly from you. We may also collect your credit-related information from credit reporting bodies, or third parties such as other credit providers or information available on public registers.

### How do we hold and store your credit-related information?

We may hold your credit-related information in paper form, or in electronic form on our secure servers. We may use cloud storage (which may be based offshore) to store credit-related information about you.

We use a range of physical and electronic security measures, such as locks and passwords, to protect the security of the credit information we hold. We also train our employees to keep information secure.

When we obtain your credit eligibility information from a credit reporting body, we may also seek publicly available information and information about any serious credit infringement that you may have committed.

### How we may disclose your credit-related information

We may disclose your credit-related information:

- to prospective funders or other intermediaries in relation to your finance requirements;

- to other organisations that are involved in managing or administering your finance such as third-party suppliers, printing and postal services, call centres, and credit reporting bodies;
- to any person managing the Marriott Vacation Club Destinations, Australia;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as finance brokers, lawyers, and accountants;
- to anyone, where you have provided us consent;
- where we are authorised to do so by law, such as under the *Anti-Money or Laundering and Counter Terrorism Financing Act 2006* (Cth); or
- to investors, agents or advisers, or any entity that has an interest in investing in, or acquiring your finance receivables or our business;
- to organisations that provide products or services used or marketed by us; or
- to your employer, referees or identity verification services.

Prior to disclosing any of your credit-related information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- the person or organisation has a commitment to protecting your personal information at least equal to our commitment; or
- you have consented to us making the disclosure.

### **Overseas disclosures**

We rely on overseas service providers, including related companies, business partners, and affiliates, for some of our activities and to do so may need to disclose credit-related information to those service providers. We may also disclose credit-related information about you to our related companies, business partners, and affiliates that are located overseas. This may include a disclosure to entities not established in Australia or that do not carry on business in Australia. It is likely that such disclosures will be made to persons in countries including the United States of America, Singapore and Hong Kong.

### **Accessing and updating your credit-related information**

You can ask us to provide you with access to your credit-related information by making a written request to the Privacy Officer information provided down below.

We will try to give you access as soon as possible. In some circumstances, we are not required to give you access. Examples include if the information relates to anticipated legal proceedings, or the request is vexatious.

We will notify you promptly if we are experiencing a delay in retrieving your information, or if we decline your request for the information.

You may request us to update your credit-related information for accuracy. We may request you to supply supporting evidence. We may also need to consult with credit reporting bodies or other financiers to investigate a claim. We will attempt to notify you about the update within 30 days.

If we refuse your request to access or correct your credit information, we will also provide you with information on how you can complain about the refusal.

## **Making a complaint**

If you are unhappy with how we have treated your credit-related information, or responded to a request to access or update your credit-related information, you may contact our complaints officer as follows:

Privacy Officer  
6649 Westwood Blvd.  
Orlando, Florida 32821  
Email: [privacy@mvwc.com](mailto:privacy@mvwc.com)

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

In order to resolve a complaint, we:

1. will liaise with you to identify and define the nature and cause of the complaint;
2. may request that you provide the details of the complaint in writing;
3. will keep you informed of the likely time within which we will respond to your complaint; and
4. will inform you of the legislative basis (if any) of our decision in resolving such complaint.

We will keep a record of the complaint and any action taken in a Register of Complaints.

If you are unhappy with our decision, you can contact our external dispute resolution scheme, the Australian Financial Complaints Authority (AFCA), at [info@afca.org.au](mailto:info@afca.org.au) or on 1800 931 678 , or the Privacy Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) or on 1300 363 992.

## **Credit reporting bodies and statement of notifiable matters**

Under the Privacy (Credit Reporting) Code 2014, we may be required to inform you about the credit reporting bodies to whom we may disclose your credit information, and of certain rights you have.

We may disclose your credit-related information to the following credit reporting bodies for the purpose of assessing and managing your credit or credit application:

- Equifax Pty Ltd – 138 332 , [www.equifax.com.au](http://www.equifax.com.au)

Credit Reporting Bodies may include credit-related information we that we provide to them in reports to other credit providers to assist them assess your credit worthiness. You may contact them on the details above to request information about how they manage your credit-related information.

If you do not meet your consumer credit payment obligations or you commit a serious credit infringement, we may disclose this information to a credit reporting body.

You may contact a credit reporting body to:

- request that they do not use your credit-related information for pre-screening credit offers for credit providers; or
- request that they do not use or disclose your credit-related information if you reasonably believe that you have been a victim of identity fraud.

This policy was updated in March 2021. You will not be notified of changes to this policy.