

Credit reporting policy

General

K.S. Farmer & M.A. Tod Dental Pty Ltd ACN 010 423 784 trading as Ethos Orthodontics is referred to in this document as **we, us** or **our**.

The *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), and the *Privacy (Credit Reporting) Code 2014* (**Credit Reporting Code**) govern the way in which we must manage your credit-related information. This credit reporting policy sets out how we collect, use, disclose and otherwise manage credit-related information.

Our separate privacy policy (available at <https://ethosorthodontics.com.au/wp-content/uploads/Privacy-Policy-Ethos-Orthodontics.pdf>) sets out how we collect, use, disclose and otherwise manage other types of personal information.

Collection

Types of information collected

We may collect and hold personal information about you (that is, information that can identify you) and is relevant to providing you with the products and services you are seeking.

If you are a patient, or a parent or guardian of a patient, we may provide you with products and services on credit terms (that is, you will pay for those products or services after we start providing them to you). As such, we may collect and hold 'credit information' about you (as that term is defined in the Privacy Act), including:

- (a) identity details; and
- (b) the fact that you have applied for credit, the type of credit, and the amount.

In this credit reporting policy, we refer to 'credit-related information' to capture some or all information related to your financial position such as credit that has been provided to you, or that you have applied for, which we may use in our decision to approve or reject your credit application (as the context requires).

Method of collection

Where possible, we will collect credit-related information directly from you through the use of our standard forms, over the internet, via email, through a telephone conversation with you or in person. We may also collect credit-related information about you from third parties acting on your behalf.

If we receive unsolicited information about you that we do not ask for or which is not directly related to our functions or activities, we may be required to destroy or de-identify that information, provided it is lawful and reasonable to do so.

Purpose of collection

We collect and use your credit-related information for the following purposes:

- (a) assessing your application for credit;
- (b) providing you with credit;

- (c) our internal management purposes that are directly related to the management of credit, including:
 - (i) assisting you to avoid defaults;
 - (ii) collecting any amount(s) you may owe us in relation to such credit and dealing with serious credit infringements; and
 - (iii) dealing with complaints or regulatory matters relating to credit;
- (d) where we reasonably believe that you have committed a serious credit infringement; and
- (e) where otherwise required or permitted by law.

Failure to provide information

If the credit-related information you provide to us is incomplete or inaccurate, we will not be able to assess your application for a credit account and we may be unable to provide you with the goods and services you are seeking.

Use and disclosure

Our use and disclosure of credit-related information is governed by Part IIIA of the Privacy Act, and the Credit Reporting Code.

We may use and disclose your credit-related information for the purposes for which it was collected (as set out above). We may also disclose credit-related information about you to:

- (a) our employees, volunteers, contractors and consultants (**workers**), and other parties who require the information to assist us with facilitating our internal business processes, providing you with information and services, and with establishing, maintaining, managing, or ending our relationship with you;
- (b) enforcement bodies;
- (c) external dispute resolution providers;
- (d) third party service providers who assist us in operating our business and providing you with information and services (including payment processors, insurers, IT and technology service providers, and professional advisers such as lawyers, accountants, and auditors);
- (e) third parties to whom you have agreed we may disclose your information; and
- (f) any other entity as otherwise permitted and required by law.

We may expand or reduce our business and this may involve the sale and/or transfer of control of all or part of our business. Credit-related information, where it is relevant to any part of the business for sale and/or transfer, may be disclosed to a proposed new owner or newly controlling entity for their due diligence purposes, and upon completion of a sale or transfer, will be transferred to the new owner or newly controlling party to be used for the purposes for which it was provided under this credit reporting policy.

We will also disclose your credit-related information to a third party where the credit-related information was collected from you for the purposes of passing that information on.

Disclosure of credit-related information overseas

We do not presently store credit-related information overseas.

Security

We store your credit-related information in different ways, including in paper and in electronic form. The security of your information is important to us. We take all reasonable measures to ensure that your information is stored safely to protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

Where information we hold is no longer necessary, we delete the information or permanently de-identify it, subject to specific laws in respect of data retention.

Access and correction

You may access the credit-related information we hold about you, upon making a written request. We will respond to your request within a reasonable period. Except where prohibited by the Privacy Act or the Credit Reporting Code, we may charge you a reasonable fee for processing your request (but not for making the request for access).

We may decline a request for access to information in circumstances prescribed by the Privacy Act (including if we cannot substantiate your identity and entitlement to the information), and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

When making a request to access credit-related information, you should also request access to credit-related information held by credit reporting bodies to ensure you have access to the most up to date information.

If, upon receiving access to your credit-related information or at any other time, you believe the information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information within 30 days (or another time frame agreed with you in writing) so that it is accurate, complete and up to date.

If we refuse to correct your information (for example, where it would be unlawful), we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

Complaints and feedback

If you have any queries or concerns about our credit reporting policy or the way we handle your credit-related information, or you wish to make a complaint about a breach of the Privacy Act, the APPs, or the Credit Reporting Code, please contact us using the details below and we will take reasonable steps to investigate your complaint in accordance with our dispute resolution process, and respond to your queries and concerns within 30 days (or another time frame agreed with you in writing).

Street address: 1929 Logan Road, Upper Mount Gravatt QLD 4122

Email address: info@ethosorthodontics.com.au

Telephone: (07) 3349 5266

Website: <https://ethosorthodontics.com.au/>

If, after this process, you are not satisfied with our response, you can submit a complaint to the Office of the Australian Information Commissioner. To lodge a complaint, visit the 'Complaints' section on the website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Privacy Commissioner's office.