



**CENTRIX GROUP LIMITED**

**ASSURANCE REPORT TO  
THE PRIVACY COMMISSIONER**

**FOR THE PERIOD  
1 JULY 2017 TO 30 JUNE 2018**

**In accordance with Clause 9 and Schedule 6 of the  
Credit Reporting Privacy Code 2004**



## 1 Purpose of Assurance Report

Centrix Group Limited (“Centrix”) is a credit reporter for the purposes of the Credit Reporting Privacy Code 2004 (“Code”). This report is provided to the Privacy Commissioner as required by Clause 9 of the Code. This Assurance Report has been prepared by a review committee established by Centrix for the purpose of preparing this report for the period 1 July 2017 to 30 June 2018 (“Review Committee”). This Assurance Report contains information that Centrix considers should not be made public and this is indicated by brackets [ ] and this information is provided separately in Schedule 3. We respectfully request that the information in Schedule 3 not be made public. We ask that the Office of the Privacy Commissioner withhold disclosure of the information contained in Schedule 3 where any Official Information Act 1982 request is made (under sections 6(c), 9(b) and/or 9(k) of that Act). We ask that if the Office considers that any of this information should be made public that Centrix is given a reasonable opportunity to present the reasons in support of withholding the information, before the information is made public.

## 2 Review Committee

### 2.1 *Members of the Review Committee*

Keith McLaughlin (Chairman), Managing Director, Centrix Group Ltd  
Bill Coleman, Operations and Compliance Manager, Centrix Group Ltd  
Janine Jackson, independent person

### 2.2 *Independent Person*

Information about Mrs Janine Jackson’s relevant experience and expertise is set out in Schedule 1, including her expertise in relation to matters of compliance with the Code.

Mrs Jackson is not (and never has been) an employee, director, or owner of Centrix.

Mrs Jackson does not only meet the “independent person” definition in the Code, she is also independent of the matters that are required to be reviewed in this process. Mrs Jackson has never been involved in the establishment, implementation or monitoring of Centrix’ Code compliance programme, nor has she ever advised or provided services to Centrix on any matter relating to Code compliance (except as an independent person on the Review Committee).

Other than being the independent person on the Review Committee for Centrix’ Assurance Reports for 2012 to 2017 and for this Assurance Report, Mrs Jackson does not provide (and never has provided) any services to Centrix.



### **3 Summary of review process and method followed by Committee**

#### **3.1 *Role of the Credit Reporting Privacy Code Compliance Committee***

In order to provide a summary of the review process and method followed by the Committee, the role of Centrix Credit Reporting Code Compliance Committee (“Compliance Committee”) needs to be explained.

The Compliance Committee is a permanent Committee established by Centrix to oversee Centrix’ compliance with the Code. In carrying out this role, the Committee undertakes a number of Code compliance tasks. Some of these tasks include:

- a) Sets all policies, procedures and forms that are required by the Code.
- b) Sets the scheduled Code monitoring activities to be undertaken (for example, type of monitoring, frequency and number of subscribers/enquiries).
- c) Reviews the policies and procedures formally at least annually and also where an event occurs that requires a review (for example a change to the Code or an operational issue has arisen).
- d) Reviews all the results of the scheduled Code compliance monitoring undertaken and any action taken as a result of the monitoring and decides whether the action taken is appropriate in terms of Code compliance.
- e) Reviews the Code Compliance Report (see below for more details on the Code Compliance Report).
- f) Reviews any Code complaints received.
- g) Reviews a summary of the Corrections Register.
- h) If appropriate as a result of the reviews undertaken in d) to g) above, sets any additional action to be taken in relation to that matter and/or an amendment to the relevant policy or procedure and follows up to ensure completed.
- i) Sets the staff training programme and monitors this.
- j) Sets the general Code compliance schedule (for example, general compliance communications to subscribers).
- k) Considers the staff access privileges to the consumer Bureau.

This Committee meets regularly to review Code compliance matters.

#### **3.2 *Code Compliance Report***

A Code Compliance Report was prepared prior to each meeting for the period under review. Each report included the following:

- a) The scheduled monitoring undertaken and the outcome of the monitoring;
- b) Details of any Code complaints received;
- c) Details of any incorrect matching;
- d) Details of any actions taken in relation to Code matters.

### 3.3 Compliance Committee meetings

For the period under review the Compliance Committee met 4 times. [1]

The Compliance Committee received a Compliance Report for each meeting (along with all supporting documentation evidencing the monitoring) and any other relevant papers that had been prepared. The report was considered and discussed at a meeting of the Committee. Minutes of every Compliance Committee meeting were taken.

All Compliance Committee agendas, meeting minutes, Compliance Reports and all papers presented to the Committee for the relevant period were reviewed as part of the process for the Assurance Report.

### 3.4 *Process and framework for the Assurance Report*

A process and framework was prepared that noted each assurance sought and in relation to each assurance detailed:

- a) The reviews to be undertaken;
- b) The personnel involved in the reviews;
- c) The reviews that would be undertaken by Mrs Jackson independently from the other Committee members;
- d) All the documentation to be reviewed.

This was a fluid document. As the reviews proceeded, additional information was sought and at times this led to other matters needing to be reviewed. The Review Committee considered it was important that during the process the scope of the reviews and the information to be considered could be widened so that all relevant matters were reviewed in the preparation of this report.

A summary of what was reviewed is set out Schedule 2. Mrs Jackson independently reviewed all this information.

Mrs Jackson had access to any staff member and all information she considered was necessary to complete her reviews.

Mrs Jackson either interviewed or communicated with the following people during the process: Keith McLaughlin, Bill Coleman, and the person responsible for the Help Desk.

## 4. Reasonable Assurances

Having completed the review, Centrix provides the following reasonable assurances for the period 1 June 2017 to 30 June 2018 ("Period").



**Reasonable Assurance** Centrix had policies in place that give effect to the requirements of the Code  
**CI 2(a)**

Centrix has a number of policies designed specifically to give effect to the requirements of the Code, as well as some general employment policies that are also relevant to Code compliance. These policies are reviewed on a regular basis including an annual formal review – for example, when there are amendments to the Code or an amendment is required due to operational matters or a strategic decision.

Centrix maintains a Staff Policies Handbook incorporating all Code and Legislative policies, General Employment policies and a General section covering breaches of policies, training and ongoing reviews of policies.

Based on a review of the Code and the policies in place, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix had internal procedures and controls in place to give effect to the policies and requirements of the Code.  
**CI 2(b)**

Centrix had a number of internal procedures and controls in place during the Period to give effect to the policies and requirements of the Code. Some examples are:

- a) The subscriber sign up process. Only certain roles in the organisation have the authority to give a subscriber access and a number of steps must be completed before a subscriber is given access to the bureau.
- b) Providing individuals access to their credit information. Only certain roles in the organisation have the authority to provide access. There is a clear stepped process that is followed before access to credit information is given.
- c) Staff access rights and changes rights to credit information are based on the duties undertaken by the staff, and were reviewed during the Period.
- d) The formal compliance monitoring procedures.

All staff are required to comply with the policies, procedures and controls (as part of their employment agreement/contractor agreement) and annual training was completed.

Based on a review of the policies, internal procedures and controls, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix provided information and training to its staff to ensure compliance with the policies, procedures and controls.  
**CI 2(c)**



Refresher training on the Code policies, procedures and controls was undertaken during the Period including all updates to the Staff Policies Handbook.

Any new staff were inducted on the Code policies, procedures and controls before they undertook any relevant Code duties.

All staff are made aware that Centrix handles sensitive personal information and of the potential repercussions (both to the person whose personal information Centrix holds and the staff member) if the policies, procedures and controls are not met.

Based on this and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information.  
CI 2(d)

Centrix' standard subscriber agreements contained Schedule 3 obligations. The subscriber agreement is entered into by the subscriber by either signing the agreement or if using the on-line process, by confirming they agree to the terms and conditions.

All the signed subscriber agreements selected as part of the review contained Schedule 3 obligations. The internal processes require the subscriber to agree to the terms and conditions of the subscriber agreement before a subscriber is given access to the bureau.

The majority of subscribers sign up on-line. The on-line sign up process requires the subscriber to scroll through the subscriber agreement and tick a box confirming they agree to the terms and conditions. An applicant cannot move to the next step in the on-line sign up process if the box is not ticked.

During the Period Centrix reviewed and updated its standard subscriber agreements.

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix followed its own policies, procedures and controls.  
CI 3(a)

Regular scheduled monitoring for Code compliance and Centrix policies, procedures and controls was undertaken during the Period. This was documented and reviewed by the Code Compliance Committee.



See also Reasonable Assurances CI 2(d), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l).

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance CI 3(b)** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that the information held by Centrix was protected by reasonable security safeguards.

Centrix has security policies and procedures in place to ensure the credit information it holds is protected by reasonable security safeguards. Access to credit information is restricted and monitored. Compliance with the policies and procedures are monitored and reviewed by the Compliance Committee.

During the Period Centrix entered into an agreement with an independent third party to provide professional IT security services.

Based on the monitoring undertaken by Centrix and the IT security company during the Period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance CI 3(c)** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed information privacy requests in accordance with rules 6 and 7.

Each quarter, monitoring for compliance with Rule 6 (access to credit information) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

All requests for correction of information are recorded on a Register. Each quarter, monitoring for compliance with Rule 7 (correction requests) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

The majority of requests for correction of credit information related to default information and in the majority of cases, after Centrix had completed its investigation, the information was corrected in accordance with the request.

Based on the monitoring undertaken by Centrix during the Period for compliance with Rules 6 and 7 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.



**Reasonable Assurance** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix took such measures as were reasonably practicable to avoid the incorrect matching of information held by Centrix.

**CI 3(d)**

Centrix has detailed processes and business rules for matching credit information. These are all automated. When an incorrect match is identified, it is immediately reviewed by Management to ensure it is not a systemic issue. The Compliance Committee regularly reviews any known instances of incorrect matching occurring in the preceding quarter.

Centrix considers people are the best “auditors” of their own information. During the Period, on average, Centrix received approximately 100 access requests a day.

At the end of year, the Compliance Committee reviewed the Registers recording correction requests, incorrect matching, any complaints and any other issues raised for the purpose of identifying any matter that may have arisen from incorrect matching.

Based on the very small number of known instances of incorrect matching [2], the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that the information held by Centrix was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading.

**CI 3(e)**

Scheduled quarterly, subscriber monitoring checks the accuracy of credit information provided by subscribers that are monitored.

People requesting access to their credit information are the best “auditors” of the credit information held by Centrix. At the end of year, the Compliance Committee reviewed all requests for corrections to credit information and the outcome of those requests.

Based on the low level of corrections made to information during the Period, the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix’ reporting and retention of credit information was in accordance with rule 9 and Schedule 1

**CI 3(f)**

Centrix has automated processes in place that results in:





1. Credit information no longer being reported once the maximum reporting period has been reached;
2. Credit information being deleted before it reaches the maximum retention period.

On a daily basis our Helpdesk reviews credit reports and that includes a review of the reporting and deletion periods as they relate to the information on the credit report.

Based on the automated processes Centrix has in place, the monitoring undertaken by Centrix during the Period for compliance with the maximum reporting and retention periods and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance CI 3(g)** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed direct marketing lists in accordance with rule 10(1C).

Centrix has documented policies and procedures in accordance with the requirements of Rule 10(1C).

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance CI 3(h)** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed suppression, release or cancellation requests in accordance with Schedule 7.

Each quarter, monitoring for compliance with Schedule 7 (suppression process) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

**[3]**

Following the decision in the previous year where Centrix decided to provide an initial suppression period of 20 working days (instead of the prescribed 10 working days) to allow individuals more time to gather documentation to support requests for an extension, this has found to be useful and appreciated by individual's so the extended period has been retained.

Based on the monitoring undertaken by Centrix during the Period for compliance with Schedule 7 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.



**Reasonable Assurance** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed complaints in accordance with Clause 8.

[4]

Based on the monitoring undertaken by Centrix during the Period for compliance with Clause 8 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix' website displayed accurate information that gave effect to rules 6(4)(b), 7(4)(b) and clause 8(3A) and clause 8.1 of Schedule 7.

The website displayed all the required information ([www.centrix.co.nz](http://www.centrix.co.nz)).

Based on the review undertaken for this assurance, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that subscribers complied with agreements and controls.

Every quarter, scheduled monitoring took place of randomly selected subscribers to check subscribers' compliance with the Schedule 3 Code obligations and controls. The outcome of the monitoring and any actions taken were reviewed by the Compliance Committee. Centrix also checks subscriber compliance as part of usual business operations (for example, a business may make an enquiry about Centrix' credit reports and the issue of whether the business has the appropriate consents in place is considered).

Based on the monitoring undertaken by Centrix during the Period for subscribers' compliance and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance** Centrix undertook monitoring activities to ensure intelligence and security agencies complied with any access agreements and controls.  
CI 3(l)

[5]

Based on a review of the process undertaken by Centrix before the uploading of the information and the relevant documentation, the Review Committee gives this assurance.

**Reasonable Assurance** Where during Centrix systematic reviews, monitoring activities or as a result of a complaint, Centrix identified a breach of an agreement, policy, procedure, control or requirement of the Code, Centrix investigated that breach, and where appropriate, took prompt remedial action.  
CI 4(a)

At its regular meetings, the Compliance Committee considers any identified breaches of agreements, policy, procedure, control or requirement of the Code, and the investigation undertaken and any actions taken including the review and updating the appropriate policy and providing training to staff.

Based on the investigations and actions undertaken during the Period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

**Reasonable Assurance** Where a deficiency was identified in the previous year's report, Centrix, where appropriate, took prompt remedial action.  
CI 4(b)

Not applicable.



## 5 Additional Information Sought From the Privacy Commissioner

**Question 1: How does your agency ensure that public records (including judgments) are correctly matched to an individual?** : Centrix uses an expert matching model on names, addresses and dates of birth to link all credit information including public records to an existing individual's file. The matching algorithms include aliases and uncommon names within the name matching component. Centrix maintains that its matching criteria is very conservative and adopts a low risk approach.

**Question 2: Specifically, what is your process for collecting and matching judgments? Has your agency encountered any identity verification issues specifically in relation to judgments?** : Centrix receives judgment data from Mercantile Gazette on a regular basis and uploads this against the reported party once it has been matched. Due to judgment data not including dates of birth and in other cases addresses not previously recorded, a portion of judgment records are not linked to an existing individual's file and remains unmatched. Centrix maintains if the judgment data does not meet the minimum matching algorithm, then it must remain unlinked to any individual's file.

**Question 3: Mandatory privacy breach notification is included in the new Privacy Bill. Have you seen any indication that notification or publication of large privacy breaches changes the behaviour of a subscriber or consumer in relation to the use of the credit reporting system?** : Centrix has not noted any increase or change in subscriber or consumer behaviour that can be attributed to large privacy breaches. While there has been an increase in the number of 'suppressions of credit information' year on year, this does not appear to be the result of large privacy breaches rather individual's inadvertently giving their personal ID information to fraudsters or close family or acquaintances knowing their ID information using it for fraudulent purposes.

**Question 4: When you receive a request for personal information from an individual's agent, please advise what steps you take pursuant to section 45 of the Privacy Act to verify the agent is properly authorised to make the request?** : Centrix usually requests the agent and individual complete a 'privacy waiver' form before disclosing personal information. There are a number of specific organisations such as the Salvation Army and budget advisory services where Centrix has established credentials with where we do not require a 'privacy waiver' form to be completed but still require a form of ID (such as a drivers licence) before disclosing personal information.

Dated 25 September 2018

Keith McLaughlin  
Managing Director and  
Chairman Review Committee



## Schedule 1

Mrs Jackson was employed by Baycorp (now known as Equifax) for a period of over 16 years, with most of that time being involved in some way in the operations of the New Zealand credit bureau. Mrs Jackson held a number of roles at Baycorp, including Privacy Officer and Operations Manager of the credit bureau. Whilst this experience was prior to the introduction of the Credit Reporting Privacy Code 2004 ("Code"), the credit bureau was required to comply with the Privacy Act 1993, which required Mrs Jackson to understand and ensure the bureau complied with the Information Privacy Principles. During this period, Mrs Jackson established the first Privacy Department in the Baycorp credit bureau operations, which increased consumer awareness and minimised complaints through implementing policies and processes. Mrs Jackson was also responsible for managing and resolving consumer complaints regarding privacy issues and liaising with the Office of the Privacy Commissioner regarding complaints.

During 2004 – 2005, Mrs Jackson was responsible for project managing all business related activities of the project undertaken by Baycorp to ensure it was ready for compliance with the introduction of the Code. Mrs Jackson was Baycorp's 'trusted advisor' who was instrumental in liaising and advising directly with the credit bureau subscribers to ensure the bureau and the subscribers had implemented the necessary processes and procedures to meet the requirements of the Code. This included (but was not limited to) a review and implementation of a consumer complaints procedure, carrying out a national 'roadshow' advising all subscribers of the Code requirements and a review of personal information data matching rules.

In addition to Mrs Jackson's previous experiences in the operations of a New Zealand credit bureau and complying with the Privacy Act, including the Code, Mrs Jackson has significant experience in IT and HR audit, risk and compliance in other financial industries. Mrs Jackson is currently employed by Suncorp New Zealand Ltd (parent company to Vero New Zealand Ltd) as an Executive Manager - People Solutions and Partnering, and held a prior role with Vero as Executive Manager - Support Services. Part of her responsibilities have included being accountable for New Zealand IT audit, risk and compliance, including IT security and IT policies for all New Zealand Suncorp Group entities. Now in her role with the human resources (HR) department, she is also responsible for privacy of information and compliance and standards of outsourcing partners. She has been active in participating in all internal audits, along with the annual external audit reviews completed by KPMG and the Australian Prudential Regulation Authority, to provide evidence and assurances that the Group IT and HR security and policies are in place, effective and being followed.

Mrs Jackson not only has experience in Code compliance, but also has significant experience in undertaking audits in the insurance industry according to the applicable New Zealand and Australian regulations.



**Schedule 2**  
**Summary of Information Reviewed**

<b>Information</b>	<b>Assurances</b>
The Code policies Centrix has in place as required by the Code. This included Mrs Jackson working through the Staff Policies Handbook and considering the internal procedures and controls required to give effect to the Code policy and requirements.	CI 2(a)
The internal procedures and controls Centrix has in place to give effect to the Code (for example bureau access and change rights, password controls and access log procedures).	CI 2(b)
The Code information, policies and the training undertaken by staff during the period under review and the staff acknowledgement forms.	CI 2(c)
The standard subscriber agreements in place during the period under review.	CI 2(d)
The subscriber on-line sign up processes.	CI 2(a), (b)
Application for Get My Credit Report (request for access to credit information) and request for correction of information and reviewed the process that was followed.	CI 2(a), (b)
Application for suppression request and reviewed the process that was followed.	CI 2(a), (b)
Information security policies, procedures and reports.	CI 2(a), (b)
Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), (b)
Credit account information procedures prior to upload	CI 2(a), (b)
Centrix' website.	CI 3(j)
Compliance monitoring procedures.	CI 2(a), 2(b) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l)
Scheduled monitoring undertaken during the period.	CI 2(a), 2(b) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l)
All Compliance Committee papers, meeting minutes, Compliance Reports, Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), 2(b) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l)