



**Equifax New Zealand
Information Services and
Solutions Limited**

Equifax Assurance Report

For the year ending 30 June 2019





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1. INTRODUCTION

Equifax New Zealand Information Services and Solutions Limited (“**Equifax**”) is a leading provider of credit information and data driven solutions in New Zealand.

Equifax’s customers in New Zealand use data intelligence provided by Equifax to make decisions on credit risk, verify identity and employee background, reduce identity theft and fraud, and undertake marketing strategies.

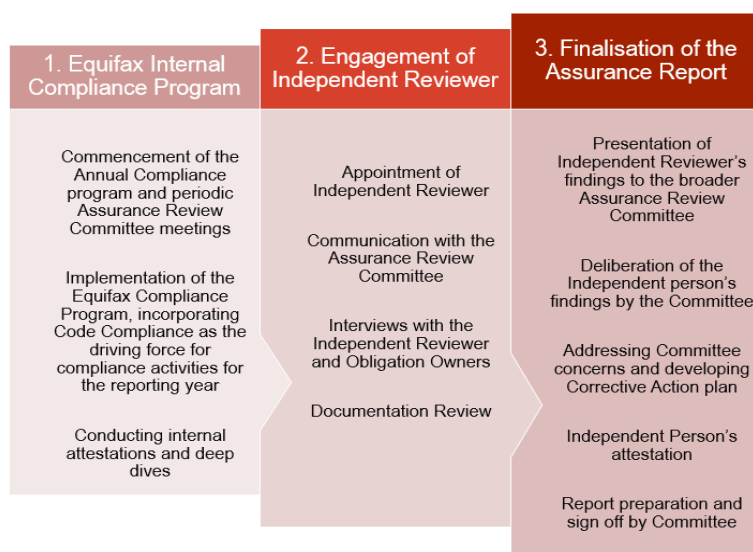
Clause 9 of the *Credit Reporting Privacy Code 2004* (“**Code**”) mandates that Equifax provide an annual report (this “**Assurance Report**”) to the Privacy Commissioner which reflects the outcome of the systematic reviews undertaken by the business under rules 5(2)(h) and 8(3)(f) and monitoring activities undertaken under rules 5(2)(e) and 8(3)(c) of the Code. Equifax is also required to provide supplementary information in relation to the “additional questions” requested by the Office of the Privacy Commissioner (“**OPC**”). Equifax also acknowledges that Amendment 14 of the Code introduced further reporting requirements including Schedule 6 and 8 amendments. Equifax has endeavored to address all the requirements of the OPC Assurance Review through this report.

This Assurance Report was prepared in line with Equifax’s formal Compliance Program, a key component of which is the Assurance Review Committee, including an independent person with expertise in assurance and Code compliance. The Independent person has supplemented Equifax’s internal compliance program by providing assurance for the period 1 July 2018 to 30 June 2019 (“**Reporting Period**”) on Equifax’s systematic review and monitoring processes. This report provides the Assurance Review Committee’s overall conclusions on compliance with the Code for the relevant period and provides the assurances required under the Code.

2. PROCESS OF REVIEW AND REPORTING

2.1 Overview of the Assurance Reporting Process

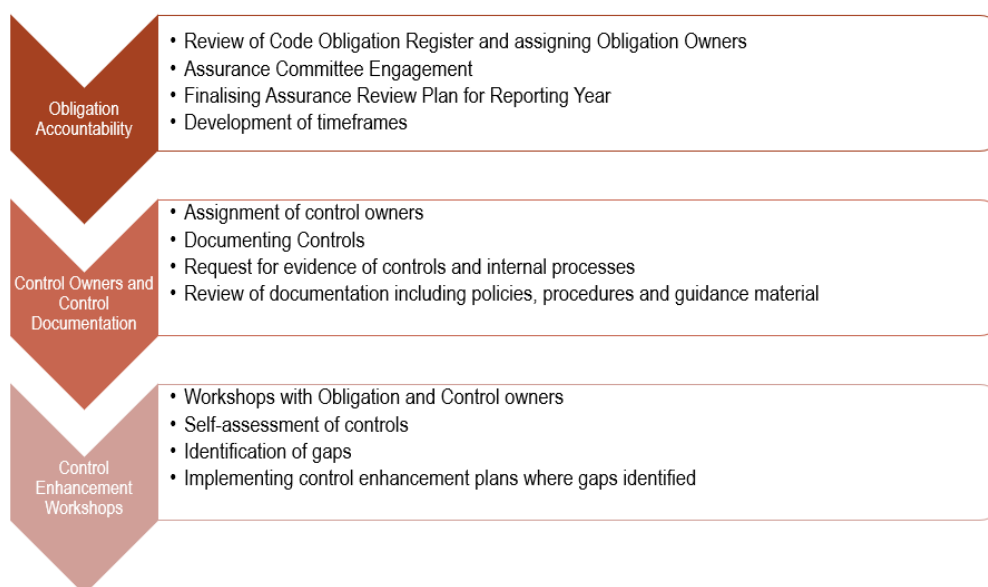
Equifax has taken the following systematic approach in developing this Assurance Report:





Notes: *Documents reviewed includes a selection of evidence required for purposes of obtaining reasonable assurance. This includes but is not limited to policies and procedures, guidelines, monitoring and review results, complaints, registers, access rights, websites, templates and application forms.

The Equifax Annual Compliance Program has the following key components:



In Summary:

1. Equifax has prepared this Assurance Report with a review committee comprising of members with accountability and responsibility for the obligations set out in Schedule 6, Obligation Owners and Control Owners, and an Independent Person (“**Independent Person**”).
2. The assurance process utilised Equifax’s internal Compliance Program to enable periodic attestations of obligations, controls, and control enhancement workshops. These were facilitated by the Compliance Officer and all results and findings were escalated to the Assurance Review Committee.
3. The Equifax Compliance Program was supplemented by both internal attestations coordinated by the Equifax Compliance Officer, and supplementary external assurance coordinated by the Independent Person.
4. Accountable Obligation Owners were provided with the obligations register and required to work with their Control Owners to review control effectiveness and provide reasonable assurance. This was conducted as part of the Equifax annual Compliance Program.
5. The role of the Independent Person was to challenge and provide an independent perspective on the design suitability and operational effectiveness of internal controls and practices pertaining to the requirements of Schedules 6 and 8.
6. The results of both were presented to the Assurance Review Committee for discussion and has culminated in the preparation of this Assurance Report to provide reasonable assurance to the OPC.
7. The Assurance Review Committee also ensured that the recommendations provided by the Independent Person have been incorporated to the Equifax Corrective Actions register for implementation.



8. The outcome is this Assurance Report which reflects the pragmatic and collective effort of the Review Committee with the aim of providing reasonable assurance to the OPC with respect to Equifax's compliance with the Code.

2.2 Assurance Review Committee

Equifax has engaged an Assurance Review Committee to oversee the preparation of this Assurance Report. This year, the Assurance Review Committee comprised of members with accountability that are in line with obligations set out in Schedule 6 and Schedule 8, and an Independent Person, to enable a higher standard of reasonable assurance.

The Assurance Review Committee was comprised of the following members:

Angus Luffman (Chair) <i>Managing Director, New Zealand</i>	Alana Hampton <i>Head of Compliance, Australia and New Zealand</i>
Deborah Malaghan <i>Head of Legal, New Zealand</i>	Jez Clement <i>Business Information Security Officer</i>
Clive Schwartz <i>Interim Head of Technology, New Zealand</i>	Bob Sparshatt <i>Chief Data Officer</i>
Paul Dunne <i>General Manager, Customer Services</i>	Lisa Ivers <i>General Manager, Solutions Delivery & Data Operations</i>
Geoff Hawkins <i>Risk and Assurance Manager</i>	Stuart Baxter <i>Head of Solutions & Analytics</i>
Deanne Myers <i>Independent Person</i>	Clemency Gomes <i>Compliance Officer</i>

The Assurance Review Committee is a valuable governance body that facilitates robust discussion relating to Code compliance and control enhancements. The Independent Person's contribution to the Review Committee also enhances the process for Code compliance by providing an external view on internal policies, processes and frameworks, ultimately resulting in improved compliance controls and risk mitigation. This Assurance Report confirms that the Assurance Review Committee has facilitated the necessary level of scrutiny and discussion to provide reasonable assurance that Equifax has met all its Code requirements for the 2018-2019 Reporting Period.

Specifically, the Assurance Review Committee has, within its scope performed the following:

- Embedded a culture for Code compliance through a formal Compliance Program;
- Implemented the three lines of defense to ensure that appropriate controls are in place to confirm Code compliance;
- Reviewed and updated all applicable internal policies and process documents;
- Reviewed and updated the Code obligation register on a regular basis;
- Conducted desktop reviews of documented policies and procedures, guidelines, monitoring and review results, complaints, registers, access rights, websites, templates and application forms;
- Conducted deep dives relating to the **additional question** areas;
- Engaged with Control Owners to assess and test control effectiveness, workshopping control enhancements where required;
- Recorded recommendations from the Independent Person relating to control effectiveness, in the Corrective Actions register; and
- Drafted this Assurance Report in conjunction with multiple deliberation and review sessions.



2.3 Independent Person

Equifax issued a request to tender to appoint an Independent Reviewer for this Reporting Period. As a result, Deanne Myers from INFO by Design Limited was appointed as the Independent Person. The new appointment has meant that Equifax's Assurance Review program has had the benefit of new insight and perspective.

Deanne is not an employee, director or contractor of Equifax. Nor has she provided any other services or consulting advice to Equifax other than as the Independent Person.

Deanne Myers is a Certified Internal Auditor, specialising in risk and privacy services. She has over 18 years' experience delivering assurance and business advisory services across the public and private sectors in New Zealand and the United Kingdom.

Deanne has extensive experience in both general and privacy assurance. Her broader privacy experience includes management of KPMG's privacy service line in New Zealand, development and application of the Government Chief Privacy Officer's Privacy Maturity Assessment Framework, and management and delivery of privacy risk assessment, privacy training, privacy policy and procedures, and breach response design and assessment.

The assurance process undertaken by Deanne during this Independent Review included:

1. Review of documentation provided by Equifax, while onsite at Equifax's Auckland office. 113 documents were reviewed and assessed against the requirements of the Code.
2. Interviews with key management. Ten interviews were held, with additional assistance provided by Equifax's Compliance Officer as required.
3. Assessment of the policies, processes and controls identified through the review of documentation and interviews, against the requirements of the Code. This assessment included establishing whether reasonable assurance of compliance with Equifax's obligations could be determined.
4. Where evidence of compliance was not provided or opportunities for improvement were identified, a risk assessment was undertaken. This risk assessment considered the likelihood of non-compliance with Equifax's obligations under the Code. Recommendations that reflect this risk assessment were then developed.



3. SUMMARY OF ASSURANCES

This section contains a summary of the assurances and associated commentary.

3.1 Schedule 6 Clauses 1 and 2 Assurances

Schedule 6 Clauses 1 and 2: Assurances relating to policies, procedures, controls and subscriber agreements

Section	Equifax Assurance Response	Commentary
1c)	<p>The report must include a statement from the independent person as required by clause 9(3)(c) of the Code.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>This report at section 2.3 includes a statement from the independent person confirming their independence, summarising their expertise and outlining their involvement with the assurance process and preparation of the report.</p>
2a)	<p>Equifax had policies in place that give effect to the requirements of the Code for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax is compliant with this requirement by effectively implementing the policies that give rise to the requirements of the Code throughout the New Zealand business.</p> <p>Equifax has an existing governance framework that provides for an appropriate forum to escalate policy requirements and updates and obtain stakeholder engagement and commitment. This governance structure includes the Assurance Review Committee and the Risk, Security and Compliance Committee, which has delegations from the Equifax Board to consider and approve policies, among other responsibilities.</p> <p>Equifax's Compliance Management Program also sets out the framework to ensure that our legal, organizational and contractual obligations are adhered to and that appropriate controls are in place to ensure compliance at all times.</p> <p>A gap analysis was conducted early during the Reporting Period and areas for improvement identified. These areas for improvement were raised at the Assurance Review Committee and action plans were initiated to actively review and appropriately enhance policy documentation. Specific areas of improvement have been within the Operations function, where line 1 policy updates and control enhancements have been instigated from a top down approach.</p>

Section	Equifax Assurance Response	Commentary
2aa)	<p>Equifax had policies in place to ensure that any arrangement with a related company accords with clause 5(2) of the Code.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Under clause 5(2) of the Code, a credit reporter must not be directly or indirectly involved in any understanding, arrangement, structure or agreement with a related company (Arrangement) where:</p> <p>a) the purpose or effect of the Arrangement is to circumvent the application of the Code on an activity to be undertaken by the related company; or</p> <p>b) the purpose or effect of the Arrangement is to enable the related company to use or disclose credit information sourced from the credit reporter that would be a breach of the Code if the use or disclosure had been made directly by the credit reporter.</p> <p>Equifax is compliant with this requirement as it predominantly provides directly all services relating to its credit bureau. Where it does have arrangements with related companies in relation to services provided by its credit bureau, these are primarily for services that it is not able to provide in New Zealand, and these arrangements do not have the purpose or effects set out in clause 5(2) of the Code.</p>
2b)	<p>Equifax had internal procedures and controls in place to give effect to the policies and requirements of the Code for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax is compliant with this requirement through its implementation of a Compliance Program that embeds the continuous improvement and enhancement of all relevant procedures and controls required for Code compliance. Our procedures and controls enable Equifax to ensure effective, consistent and due care towards our clients and individuals in New Zealand. As the custodians of credit information, we take our role as a credit reporter seriously and as such, have implemented periodic reviews, both from a line 1 and line 2 perspective to enhance and maintain our internal procedures and controls.</p> <p>The Equifax control environment is varied depending on our objectives and specific obligations. Equifax actively incorporates a range of automated and manual controls such as access authorisation and approvals, verifications, signoffs, and performance reviews to ensure that our Code obligations are met across the board.</p> <p>Procedures enhanced during this Reporting Period include, but are not limited to:</p> <ul style="list-style-type: none"> • Operations Procedure documents pertaining to specific obligations such as corrections and default deletion requests; • Subscriber Monitoring and Testing Standards have also further matured through the inclusion of a periodic review of all subscribers, including major credit providers. • The Privacy Impact Assessments Process has been further enhanced during this Reporting Period through the operationalization of the process and face-to-face training with relevant document owners.

Section	Equifax Assurance Response	Commentary
		<ul style="list-style-type: none"> The Customer Complaints and Investigations Process has been significantly uplifted over the past 12 months with considerable effort being placed on the escalation and timely management of customer complaints and investigations. Equifax has refined this by implementing a case management system to assist with the process.
2bb)	<p>Equifax had appropriate procedures in place to ensure that any information requested under rule 6 is received only by that individual or, where the request is made by an agent on behalf of the individual, only by that individual or his or her agent [such procedure must amongst other things ensure, as far as possible, that where information intended for an individual is received by a properly authorised agent that it is not subject to bundled authorisations for other purposes that would have the purpose or effect of circumventing the code's prohibitions on marketing and direct marketing.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax is compliant with this requirement. As noted under section 2aa) above, Equifax mostly does not have applicable arrangements with third parties in relation to its credit bureau services. This includes not having any bundled authorisations by third parties or related parties acting as authorised agents.</p> <p>If an individual appoints an agent to receive their credit information, this is done on a case by case basis, and requires the individual's express consent in writing. This consent is solely for the purpose of appointing someone to act as the individual's agent.</p>
2c)	<p>Equifax had provided information and training to its staff to ensure compliance with the policies, procedures and controls for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>The Compliance Team, in conjunction with the Equifax Learning and Development Team, supports the training and development of Equifax staff, through contact centre induction training, product, process, systems and other training needs. Equifax maintains a structured training program for staff of all levels and for the various roles and responsibilities. Training provided is both customised and generic with multiple delivery formats to take an individual through a purposeful learning process.</p> <p>Staff are provided induction training as part of their on-boarding and cross-skill process which includes training on the Code, regulatory obligations and compliance requirements in accordance with</p>

Section	Equifax Assurance Response	Commentary
		<p>Equifax's risk and compliance framework. Role specific training is also provided on an on-going basis by managers in relation to Code requirements, policies and procedures and internal controls. All employees are also required to complete a series of induction and scheduled annual compliance training via our interactive e-learning (online) platform. Modules provided via this platform include:</p> <ul style="list-style-type: none"> • Privacy • Data and Information Security • Discrimination • Health and Safety • Anti-Bullying and Anti-Harassment <p>Employees are required to complete testing on these modules. Additionally, Equifax staff are provided access to policies, procedures, reading materials on products and services, and the employee handbook via our local intranet site and the wider Equifax database.</p>
2d)	<p>Equifax ensured that subscriber agreements that complied with schedule 3 were in place before disclosing credit information for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax's subscriber terms and conditions stipulate all Code requirements including specific obligations listed in Schedule 3.</p> <p>All subscribers are required to go through a subscriber on-boarding process, which includes a detailed application, due diligence, signing up of a subscriber agreement which includes Equifax terms and conditions for services, and setting of bureau access with specific relevant access codes.</p> <p>No services are provided unless an executed subscriber agreement has been signed and received.</p> <p>Through our terms and conditions, subscribers are also made aware of Equifax's obligations to monitor and systematically review their use of our consumer credit reporting services and their compliance as a subscriber to the Code.</p> <p>In addition to the above, Equifax also works closely with our network of subscribers to ensure that regular training and support is provided to ensure that they are made aware of the requirements of Schedule 3. Our Sales team work closely with all our Subscribers to ensure that the Terms of Agreement are well understood and maintained throughout the course of access to the Equifax Bureau. Over the coming reporting year, Equifax will be focusing on this further to develop a formal structure for line 1 Sales training and support to be provided by our Client Managers to all NZ Subscribers and Credit Providers.</p>

Section	Equifax Assurance Response	Commentary
2e)	<p>Equifax ensured that access agreements under schedule 3A were in place before disclosing credit information.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax is compliant with this requirement. Schedule 3A requires Equifax to impose certain obligations on the intelligence and security agency in relation to access to its credit bureau. Equifax imposes these obligations through requiring the intelligence and security agency to agree to its standard subscriber terms which include these obligations.</p>

3.2 Schedule 6 Clause 3 Assurances

Schedule 6 Clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements

Section	Equifax Assurance Response	Commentary
a)	<p>Equifax undertook monitoring activities to ensure it followed its own policies, procedures and controls and to ensure reasonable compliance with the code for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Over the past 12 months, Equifax has implemented a system of dual monitoring through its line 1 and line 2 functions. Monitoring activities have been enhanced to include accountability from both the line 1 business and line 2 Compliance Team. This has resulted in policy, procedures and controls being reviewed, updated and policy compliance reviews being conducted through the three lines of defense model to ensure Code compliance.</p> <p>Equifax identifies, assesses and monitors regulatory and compliance risks, tests controls, and reports observations and findings to management. Specifically, the line 2 Compliance Monitoring Program sets out written standards and procedures to be followed in developing and maintaining a comprehensive Monitoring and Testing program which forms part of Equifax's Compliance Program. The mandate of the Monitoring team specifically is to conduct internal and external monitoring, including reviews of compliance to our internal Equifax policies and procedures.</p> <p>This has been enhanced over the past reporting year with key line 1 functions such as Customer Services, Client Onboarding, Data Onboarding, and IT Security teams embedding line 1 monitoring within their functions. These activities are regularly conducted with results escalated to the Assurance Review Committee for review. Where there are areas requiring further uplift, the Equifax Compliance team will work with them in the next Reporting Period to build out and enhance the line 1 function.</p>

Section	Equifax Assurance Response	Commentary
b)	<p>Equifax undertook monitoring activities to ensure the information held by Equifax was protected by reasonable security safeguards for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax implements and maintains security policies and protocols with the aim of preserving appropriate security and safety safeguards to protect its assets including people, property and information resources and to comply with the applicable regulation, contractual commitments and industry standards relating to information security. Equifax is committed to protecting individuals credit information and adhering to the Code requirements, and over the past 12 months, Equifax’s security environment has been significantly enhanced through both domestic and Global policy and procedure uplifts.</p> <p>The Equifax security framework includes firewalls, secure housing of the database with relief backup provisions, restricted accesses and controlled log-ins. Access to personal and credit information is restricted to staff based on their role and responsibilities. Additionally, Equifax also takes into consideration segregation of duties when authorising system access. No staff are assigned a combination of duties or authorities that may compromise business process or controls which could be detrimental to Equifax. Access controls are also monitored on a regular basis to ensure that access is not provided to staff beyond what is required.</p> <p>Alongside Equifax’s internal information security assurance program, annual penetration testing of our environment is performed by an independent third party in order to ensure the security of our systems and applications. All Disaster Recovery, Crisis Recovery and Business continuity plans are up to date.</p>
c)	<p>Equifax processed information privacy requests in accordance with rules 6 and 7 for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax continues to implement a monitoring process to ensure compliance with the Code in relation to providing individual’s access (rule 6) to their credit information. This has ensured reduced timeframes that reflect positive outcomes brought about from Code amendments. Monitoring includes tests for timely responses for access to credit information, offering of suitable products in line with Code requirements, and ensuring that the required supplementary information (highlighted below) is provided with each access request.</p> <p>Equifax has also made available various channels for individuals to request access for their free credit file, which includes our website, phone call, email and post. Continuous review of our call scripts, templates and website ensures that our customers are provided with accurate information relating to our products services and customer rights.</p> <p>Equifax has put in place an investigation process to ensure compliance with the Code in relation to correction (rule 7) of credit information. All correction requests go through a structured process to ensure the right steps, actions and responses are taken in accordance with the Code. Additionally, all correction requests are monitored to ensure timely response from the time of initiation to resolution in accordance with the Code. In instances where corrections are made to an individual’s credit file, Equifax ensures that all parties involved are informed of the changes.</p>

Section	Equifax Assurance Response	Commentary
		<p>Equifax makes available comprehensive product and service information (supplementary) for consumers to help them to make fully informed decisions in relation to accessing and correcting their credit information, including:</p> <ul style="list-style-type: none"> • Your credit file explained • Your rights explained • Comprehensive reporting – What it means for you • Understanding your Equifax Score
d)	<p>Equifax undertook monitoring activities to ensure it took measures as reasonably practicable to avoid the incorrect matching of information held for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax has automated matching protocols that underpin the data matching process. During the Reporting Period, monitoring of the matching function has been conducted by the Data & Analytics team, which includes reviewing and assessing the matching logic used within the Equifax bureau. Subsequently, improvements have been identified and a plan will be established to implement the improvements.</p> <p>In instances where Equifax has identified records that are wrongly matched, immediate action is taken to rectify the issue and where required, appropriate controls are put in place, including flagging and suppressing of credit files. In addition, match rates at a macro level are reported and provided back to subscribers with the intention to monitor them for consistency.</p>
e)	<p>Equifax undertook monitoring activities to ensure the information held was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax is compliant with the Code through the implementation of a number of key controls, including our system design, business processes, continuous internal and external (subscribers) monitoring, subscriber agreements, assessment of enquiries and investigations, quality attestation, outcomes and resolution of complaints, and feedback provided by both the public and subscribers.</p> <p>Equifax has many controls to ensure that the information held on our credit bureau is subject to reasonable checks and is accurate, up to date, complete, relevant and not misleading. Where an inconsistency is identified, Equifax is quick to correct within the remit of its internal corrections process, which provides individuals with an avenue to request rectification of their data.</p> <p>A summary of key controls enhanced over the last reporting year include:</p> <ul style="list-style-type: none"> • Review and improvement to the algorithms that drive the matching logic through automated processes, • A corrective actions process for issues identified, • Continuous employee training and development,

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Section	Equifax Assurance Response	Commentary
		<ul style="list-style-type: none"> • Systematic rules that mandate data retention within the mandatory period, • Subscriber monitoring program which monitors subscriber activities including the collection, use and disclosure of credit information by Equifax, and • Further reviews by the Data & Analytics team to ensure data accuracy, including enquiries and investigations both statistically and for substance to understand and identify any systemic issues.
f)	<p>Equifax's reporting and retention of credit information was in accordance with rule 9 and schedule 1 for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax's retention process and controls have been updated given the Amendments to the Credit Reporting Code. This has been particularly captured through adopting changes to retention periods for credit information (5 years to 4 years) in response to those Amendments.</p> <p>Each of the data fields identified in Schedule 1 of the Code are assigned an automated removal date and the system is designed for the information to automatically be removed in accordance with these protocols. Systematic rules have been updated so that preventive action to mandate data retention in relation to the type of information retained and the period the information is retained for.</p> <p>Testing and monitoring conducted during this Reporting Period, has not indicated an area where data was retained beyond the maximum reporting period. In addition, no unsolicited data was retained where not required.</p>
g)	<p>Equifax processed direct marketing lists in accordance with Schedule 9 for the year ending 30 June 2019.</p> <p>The Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Direct marketing lists, where requested by a subscriber, are now processed in accordance with Schedule 9 following Amendment No.14 to the Code. Specific contractual terms apply when a subscriber makes a request to process a direct marketing list to ensure subscriber compliance.</p> <p>Equifax confirms that information derived from pre-screening direct marketing lists is not retained or used by the credit reporter for the purpose of credit reporting.</p>
h)	<p>Equifax undertook monitoring activities to ensure suppression, release or cancellation requests are processed in accordance with Schedule 7 for the year ending 30 June 2019.</p>	<p>Equifax conducted monitoring activities to ensure that suppression requests were always conducted comprehensively and in a timely manner by our staff. Equifax confirms that when individuals lodge a suppression request, they are informed of the effect of the suppression and the process to make an extension request, release request and cancellation request.</p> <p>Equifax, together with the other credit reporters, has made progress toward introducing a streamlined process for initial suppression requests, so that an individual only needs to contact one credit reporter, who in turn, will notify the other credit reporters of the request.</p>

Section	Equifax Assurance Response	Commentary
	<p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>All suppressions are also monitored to ensure that an extension request is performed on the basis of the evidence provided by the individual and also by taking into consideration the individual's situation on a case by case basis.</p> <p>In the next 12 months, Equifax is committed to further enhancing external websites and internal documentation in relation to suppression, release or cancellation requests. These items have been raised through the Assurance Review Committee and included as part of the Corrective Actions register.</p>
i)	<p>Equifax undertook monitoring activities to ensure complaints are processed in accordance with clause 8 for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax has embedded formal Complaints management and escalation processes to ensure that all complaints are processed in accordance with clause 8 of the Code. This is predominantly conducted by Equifax's Customer Service Centre with assistance from the Compliance Officer during instances of escalation.</p> <p>Equifax conducts call quality testing on all its Contact Centre staff regularly to ensure that complaints, investigations, corrections requests, and suppression requests are appropriately managed. This process captures observations and feedback is provided back to operators to ensure that there is continuous improvement in the management of these items. Our monitoring initiatives have not found a breach of the Code in relation to response times for complaints during this Reporting Period. All customer services staff, including staff managing complaints and investigations, are required to undergo regular refresher training, specifically in relation to the requirements of the Code.</p>
j)	<p>Equifax's website displayed accurate information and gave effect to rules 6(4)b, 7(4)b, clause 8(3A) and clause 8.1 of Schedule 7 for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>The Equifax website www.mycreditfile.co.nz is periodically reviewed and updated as required. The website displays all required information in a clear, comprehensive and accurate manner to give effect to the Code.</p> <p>This Reporting Period, specific amendments to the website include the location of, as well as the languages published, for the Summary of Rights. Equifax has also initiated a project to holistically review and subsequently improve the www.equifax.co.nz website so that information is more readily available to all individuals in New Zealand.</p> <p>Equifax has identified that the location and specificity of the information on its website relating to Suppression requests needs to be made more clearly visible and distinct. We have, upon the recommendation from the Independent Reviewer, included as part of our Corrective Actions Register an action item to amend and update the information relating to Suppression requests.</p>

Section	Equifax Assurance Response	Commentary
k)	<p>Equifax's subscribers complied with agreements and controls for the year ending 30 June 2019.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax's credit bureau services for New Zealand subscribers are contingent on subscribers completing a comprehensive on boarding process, which includes completion of an application, due diligence checks on the subscriber's organisational structure and sighting of an executed contract (which are aligned to the Code requirements) between Equifax and the subscriber. No services are provided unless an executed subscriber agreement has been signed and received.</p> <p>This is supplemented through a formal Subscriber Monitoring program whereby subscribers are randomly reviewed to ensure that they adhere to the contractual and Code requirements. In the last Reporting Period, Equifax has enhanced this program to include training and support to subscribers through guidance on obtaining consent and working with Client Managers to communicate best practice standards to all Equifax Subscribers. This has evolved the process from previous reporting years to incorporate elements of both line 1 and line 2 monitoring and advisory support being undertaken by Equifax.</p>
l)	<p>The intelligence and security agencies complied with any access agreements and controls.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax previously provided access to credit information to intelligence and security agencies where the request fell within a permitted disclosure in Rule 11(c). Code Amendment 11, which occurred in 2017, resulted in Equifax being able to provide this information more readily without having to be satisfied that the disclosure fell within Rule 11(c) of the Code. Intelligence and security agencies are subject to the standard access agreement and controls adopted by Equifax.</p>
m)	<p>Equifax undertook monitoring activities to ensure reasonable compliance with the Code, including that the requirements on both the subscribers and the credit reporter under Schedule 10 in relation to tracing individuals were met.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax has set out above the various monitoring it does on its subscribers and itself to ensure compliance with the Code. Equifax has not provided any services in relation to tracing under Schedule 10 of the Code during the applicable reporting period, and therefore has not undertaken monitoring in relation to this specific provision.</p>



3.3 Schedule 6 Clause 4 Assurances

Schedule 6 Clause 4: Assurances relating to action taken on deficiencies

Section	Equifax Assurance Response	Commentary
a)	<p>During this review period for the year ending 30 June 2019 where, Equifax identified a breach of an agreement, policy, procedure, control or requirement of the Code as a result of systematic reviews, monitoring activities or as a result of a complaint, Equifax had investigated the breach and where appropriate took prompt remedial action.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax takes breaches very seriously and has implemented a monitoring and investigations process to ensure all breaches are reviewed, and the appropriate corrective action is then undertaken, to remediate, mitigate and prevent the breach from reoccurring. All incidents, including near misses are recorded in an Incident Register. Where a breach has been identified, the breach is reported to both the Assurance Review Committee and the Risk, Security and Compliance Committee for appropriate escalation.</p> <p>As a Committee, the Assurance Review Committee reviews and discusses all incidents that have been escalated to ensure appropriate corrective action plans are in place and that control enhancements are enacted to prevent reoccurrence. For any incidents that occurred during the Reporting Period, Equifax has put in place corrective actions.</p>
b)	<p>During this review period for the year ending 30 June 2019, where a deficiency was identified in the previous year's report, Equifax where appropriate, took prompt remedial action.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>As a result of the internal attestation process, and broader reviews conducted by Equifax both globally and within the region, recommendations have been provided to strengthen the control environment for the New Zealand business. The Corrective Actions register formally documents all actions agreed by the Assurance Review Committee and are monitored throughout the Reporting Period to ensure that actions are on track for completion within the required timeframes.</p> <p>Progress reports of all items on the Corrective Actions register are provided to the Assurance Review Committee periodically so that there is appropriate oversight.</p> <p>As with previous years, this year's Independent Reviewer has made some general recommendations for improvement based from their review. Equifax has formally documented these recommendations on the Corrective Actions register to implement the actions appropriately and track completion. Action owners have been assigned to ensure that these Corrective Actions are completed.</p> <p>Specifically, Equifax is committed to reviewing our documentation in relation to Suppression processes and update our website with a dedicated page for Suppression requests.</p>





3.4 Schedule 8 Clause 3 Assurances
Schedule 8 Clause 3: Assurances relating to Transitional Provisions

Section	Equifax Assurance Response	Commentary
a)	<p>Equifax undertook monitoring activities to ensure that any systems testing undertaken by the credit reporter in reliance upon clause 1.1 met the requirements of clause 1.2.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Under clause 1.1 of Schedule 8, a credit reporter may collect personal information from a subscriber or another agency and use that information to test its systems, or its subscribers' systems, for handling the effects of Amendment No 14 (e.g. in relation to additional or restricted classes of credit information). Under clause 1.2, clause 1.1 is limited in the following ways: (a) personal information must not be used for testing where de-identified or fictitious information would suffice; and (b) information collected must not be made available for subscribers or disclosed in a credit report or kept for longer than is required for the purposes of systems testing.</p> <p>Equifax did not undertake any systems testing using personal information from a subscriber or another agency during the applicable reporting period.</p>

4. ADDITIONAL QUESTIONS

The following additional questions were raised as areas of interest by the Commissioner. Equifax's responses are set out below.

No	OPC Request	Commentary
1	<p><u>Subscribers acting as agents</u></p> <p>Do you have subscribers that get access to individual credit information as their agent?</p> <p>What steps do you have in place to ensure that the agent is not using credit information (such as name, address,</p>	<p>Equifax does have subscribers who obtain access to individual credit information as agents. These include Credit Providers, Utility Providers and other Equifax clients.</p> <p>Equifax has in place strict terms of engagement to ensure that our Subscribers are not inadvertently or intentionally marketing credit products to individuals. Our Terms of Agreement clearly state this.</p> <p>Additionally, Equifax also have stringent automated controls to ensure that only specific information is provided to subscribers acting as agents and that a legitimate purpose is provided on each occasion of access. Where appropriate purpose codes are not provided, access to credit information is prevented.</p>



No	OPC Request	Commentary
	age, credit score etc.) to market credit products?	<p>Furthermore, Equifax works closely with our subscribers and partners to ensure that they are aware of their Code obligations and that as a Credit Reporting body, we are providing our partners with sufficient information and training so that they can collect appropriate consent prior to accessing credit information held on our bureau.</p> <p>Finally, Equifax has a mature Subscriber Monitoring program whereby our Subscribers are monitored at random to ensure that they are upholding their obligations under the Code and Equifax’s Terms of Agreement. This includes monitoring activity to ensure that our Subscribers are not inappropriately using credit information on individuals to market credit products.</p>
2	<p><u>Bundled authorisations</u></p> <p>How does your agency ensure that subscribers do not seek unrelated consents from individuals in exchange for their right to access credit information?</p>	<p>Equifax does not rely on bundled consents.</p> <p>Not Applicable.</p>
3	<p><u>Marketing/Direct Marketing</u></p> <p>How does your agency ensure that credit information is not used for marketing by a subscriber or any other agency?</p> <p>Can you confirm that your agency does not provide a service for your subscribers that assists your subscribers in assessing an individuals’ creditworthiness to offer credit products?</p>	<p>Equifax has stringent controls in place to ensure that credit information is not used for marketing by a subscriber or any other agency. We do not disclose credit information without appropriate consent, and we do not provide identifiable credit information to any other organisations other than our subscribers. In accordance with the Code requirements, where we undertake pre-screening, the subscriber is not given the pre-screened list.</p> <p>Equifax does not offer a product or service that enables any Credit Provider to access credit information with the intention of on-selling credit products. Our Subscriber Terms stipulate specific purposes for accessing credit information through our bureau and there are several internal checks and balances embedded to ensure that our subscribers meet the Terms. Subscribers are only allowed access upon obtaining consent from an individual to access their credit information for a specific purpose. This purpose must be within the remit of assessing creditworthiness and nothing more.</p> <p>As stated above, Equifax supplements these controls through its Subscriber Monitoring activities to ensure that subscribers are only accessing credit information for appropriate purposes and with appropriate consent. This program of work includes identifying instances where inappropriate access has been obtained and taking appropriate action to remove Subscriber access where a breach has been identified. During this Reporting Period, the Equifax Subscriber Monitoring function removed access to one Subscriber due to inappropriate access.</p>

No	OPC Request	Commentary
4	<p><u>Tracing individuals for unclaimed monies</u></p> <p>Since its implementation has your agency used the credit reporting system for tracing to facilitate the return of money owed to individuals?</p> <p>Have you experienced any system issues or concerns from individuals?</p>	<p>Since its implementation, Equifax has not used the credit reporting system for tracing to facilitate the return of money owed to individuals. Equifax will be undertaking an activity of documenting its intended process prior to conducting any tracing of individuals for unclaimed monies.</p> <p>Not Applicable. However, Equifax is committed to developing this to a fully automated function in the following reporting year with associated monitoring activities being developed simultaneously to ensure that our Code obligations are met.</p>