



Equifax New Zealand Information Services and Solutions Limited

Assurance Report

Year ending 30 June 2020

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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.

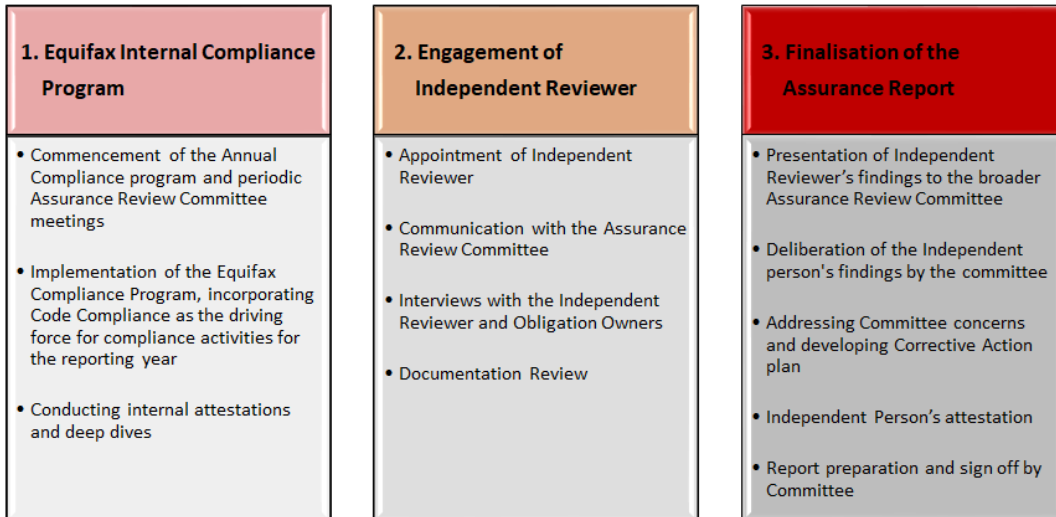
Clause 9 of the Credit Reporting Privacy Code 2004 ("**Code**") mandates that Equifax provide an annual report (this "**Assurance Report**") to the Privacy Commissioner which reflects the outcome of the systematic reviews undertaken by the business under rules 5(2)(h) and 8(3)(f) and monitoring activities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

This Assurance Report was prepared in line with Equifax's formal Compliance Program, a key component of which is an Assurance Review Committee constituted in accordance with clause 9(2)(b) of the Code ("**Assurance Review Committee**"), which includes an independent person with expertise in relation to matters of Code compliance ("**Independent Person**"). The Independent Person has contributed to Equifax's internal Compliance Program by providing assessment and assurance for the period 1 July 2019 to 30 June 2020 ("**Reporting Period**") in respect of Equifax's systematic review and monitoring processes. This report provides the Assurance Review Committee's overall conclusions on compliance with the Code for that Reporting 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 include 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.

In Summary:

1. Equifax has prepared this Assurance Report through its Assurance Review Committee comprising of members with accountability and responsibility for the obligations set out in Schedule 6 and the Independent Person, in liaison with Obligation Owners and Control Owners.
2. The assurance process uses Equifax's internal Compliance Program to enable periodic attestations of obligations and controls by Obligation Owners and Control Owners. These were facilitated by the Compliance Officer and all results and findings were escalated to the Assurance Review Committee.
3. The Compliance Program was supported by both internal attestations coordinated by the Compliance Officer and supplementary external assurances initiated or 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 to 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 of the Code.

6. The results of both steps 4 and 5 (above) were presented to the Assurance Review Committee for discussion.
7. The Assurance Review Committee has also ensured that recommendations provided by the Independent Person have been incorporated into the Equifax Corrective Actions register for implementation.
8. The outcome is this Assurance Report which reflects a pragmatic and collective effort of the Assurance 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 was comprised of members from within Equifax or its related Group members with accountability in line with the obligations set out in Schedule 6 (so as to enable a higher standard of reasonable assurance) and was assisted by a review and report from the Independent Person.

The Assurance Review Committee was comprised of the following members:

Angus Luffman (Chair)	<i>Managing Director, New Zealand</i>
Alana Hampton¹ John Wood²	<i>General Manager Compliance, Australia and New Zealand</i>
Clive Schwartz³ Raoul Hamilton-Smith⁴	<i>Head of Technology, New Zealand</i>
Jez Clement⁵ Anthony Abraham⁶	<i>Business Information Security Officer</i>
Deborah Malaghan	<i>Head of Legal, 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>
Suellen Heintz	<i>General Manager, Product and Market Development</i>

¹ During the Reporting Period

² Overseeing preparation of this Assurance Report

³ Part of the Reporting Period

⁴ Part of the Reporting Period & overseeing preparation of this Assurance Report

⁵ Part of the Reporting Period

⁶ Part of the Reporting Period & overseeing preparation of this Assurance Report

Deanne Myers⁷	<i>Independent Person</i>
Brett Barratt	<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 Reporting Period.

Specifically, the Assurance Review Committee has, within its scope, performed or satisfied itself that Equifax has performed the following:

- Embedded a culture for Code compliance through a formal Compliance Program;
- Implemented the three lines of defence 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 any **additional question** areas;
- Engaged with Control Owners to assess and test control effectiveness where required;
- Considered and 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 again retained the services of its 2018-2019 reporting year Independent Person for this Reporting Period, reappointing Deanne Myers from INFO by Design Limited. Deanne was supported by Benjamin Scully, a Consultant with INFO by Design Limited. The re-appointment has meant that the Equifax has had the benefit of deeper insights and informed perspective from an Independent Person familiar with its business

⁷ Involvement constrained to scope of retainer, to provide an external view on internal policies, processes and frameworks

operations.

Neither Deanne Myers, nor Benjamin Scully were or are engaged by Equifax as employees, directors or contractors of Equifax (other than, indirectly, as specified persons under the contract with INFO by Design Limited or purposes of conduct of the independent review and, in the case of Deanne, as a member of the Assurance Review Committee concomitant with that). Neither have they provided any other services or consulting advice to Equifax, other than in the capacity of acting as the Independent Person.

Deanne Myers is a Certified Internal Auditor, specialising in risk and privacy services. She has over 19 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.

Benjamin Scully, who has supported the independent review process with Deanne, holds an LLB from Victoria University of Wellington and also possesses relevant experience working in the areas of privacy and data protection.

The assurance process undertaken by INFO by Design Limited during this Independent Review included:

- Review of documentation provided by Equifax, while onsite at Equifax's Auckland and Wellington office. One hundred and seventeen (117) documents were reviewed and assessed against the requirements of the Code.
- Interviews with key management. Nine (9) interviews were held, with additional assistance provided by Equifax's Compliance Officer as required.
- 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.
- 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.
- Report by the Independent Person to the balance of the Assurance Review

Committee and related discussions with that committee, various of its members and Compliance officers.

Each of Deanne and Benjamin confirms their independence.

3. Summary of Assurances

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

3.1 Schedule 6 Clauses 1 and 2 Assurances

Assurances relating to policies, procedures, controls and subscriber agreements

Section	Equifax Assurance Response	Commentary
1c)	The report must include a statement from the independent person as required by clause 9(3)(c) of the Code.	Section 2.3 of this Assurance Report 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 Equifax Assurance Report.
2a)	<p>Equifax had policies in place that give effect to the requirements of the Code for the reporting period.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax is compliant with this requirement. Its compliance is demonstrated through the effective implementing of policies that address and satisfy 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.</p> <p>Equifax's Compliance Management Program also sets out the framework to ensure that legal, organisational and contractual obligations are adhered to and that appropriate controls are in place to ensure compliance at all times.</p>
2aa)	Equifax had policies in place to ensure that any arrangement with a related company accords with	Equifax has not been directly or indirectly involved in any understanding, arrangement, structure or agreement with a related company (Arrangement)

Section	Equifax Assurance Response	Commentary
	<p>clause 5(2) of the Code.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>where:</p> <ul style="list-style-type: none"> 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 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>Equifax is compliant with clause 5(2) of the Code 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. Any such arrangements put in place do not have either the purpose nor any of the 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 reporting period.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax is compliant with this requirement through the implementation of a Compliance Program that embeds continuous improvement and enhancement of all relevant procedures and controls required for Code compliance. Current procedures and controls enable Equifax to ensure effective, consistent due care towards clients and individuals in New Zealand. As the custodians of credit information, we take our role as a credit reporter seriously, and 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.</p>
2bb)	<p>Equifax had appropriate procedures in place to ensure that any information requested under rule 6 is received only by that individual or,</p>	<p>Equifax is compliant with this requirement.</p> <p>As reported under the response provided in section 2aa) above, Equifax in the main does not</p>

Section	Equifax Assurance Response	Commentary
	<p>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>have any 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 reporting period.</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 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.</p> <p>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 • Anti-Discrimination

Section	Equifax Assurance Response	Commentary
		<ul style="list-style-type: none"> • 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 reporting period.</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>
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</p>	<p>Schedule 3A requires Equifax to impose certain obligations on the intelligence and security agency in relation to access to its credit bureau. Equifax is fully compliant with Schedule 3A and imposes these obligations through requiring the intelligence and security agency to agree to its standard subscriber terms (which include these</p>

Section	Equifax Assurance Response	Commentary
	compliance with this requirement.	obligations).

3.2 Schedule 6 Clause 3 Assurances

Assurances relating to monitoring of policies, procedures, controls and subscriber agreements

Section	Equifax Assurance Response	Commentary
3a)	Equifax undertook monitoring activities to ensure it followed its own policies, procedures and controls and to ensure reasonable compliance with the code for the reporting period.	<p>Equifax has a system of dual monitoring through its line 1 and line 2 functions. Enhanced monitoring activities which include accountability from both the line 1 business and line 2 Compliance function has resulted in policy, procedures and controls being reviewed, updated and policy compliance reviews being conducted through the three lines of defence 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>
3b)	<p>Equifax undertook monitoring activities to ensure the information held by Equifax was protected by reasonable security safeguards for the reporting period.</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.</p> <p>Equifax is committed to protecting individuals credit information and adhering to the Code requirements, through both continuous</p>

Section	Equifax Assurance Response	Commentary
		<p>improvement and monitoring of the effectiveness of applicable domestic and Global policy and procedure.</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>
3c)	<p>Equifax processed information privacy requests in accordance with rules 6 and 7 for the reporting period.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax has a monitoring process to ensure compliance with the Code in relation to providing individual’s access (rule 6) to their credit information. This process is subject to continuous improvement and ensures reduced timeframes have been implemented that reflect positive outcomes brought about from Code amendments.</p> <p>Monitoring includes performing 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 various channels for individuals to request access for their free credit file, including through website, phone call, email and post. Regular review of our call scripts, templates and website ensures that our customers are provided</p>

Section	Equifax Assurance Response	Commentary
		<p>with accurate information relating to our products services and to customer rights.</p> <p>Equifax has 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. 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> <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; and • Understanding your Equifax Score
3d)	<p>Equifax undertook monitoring activities to ensure it took measures as reasonably practicable to avoid the incorrect matching of information held for the reporting period.</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.</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>
3e)	<p>Equifax undertook monitoring activities to ensure the information held was subject to reasonable checks to ensure that it was</p>	<p>Equifax is compliant with the requirements of the Code. Use of a number of key controls, including our system design, business processes, continuous internal and external (subscribers)</p>

Section	Equifax Assurance Response	Commentary
	<p>accurate, up to date, complete, relevant and not misleading for the reporting period.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>monitoring, subscriber agreements, assessment of enquiries and investigations, quality attestation, outcomes and resolution of complaints, and feedback provided by both the public and subscribers ensures the Code obligations are complied with.</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>
3f)	<p>Equifax's reporting and retention of credit information was in accordance with rule 9 and schedule 1 for the reporting period.</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. Data Retention is enforced through daily jobs that are run on the NZ Bureau and are monitored through error alerting by the NZ Support team. In addition, no unsolicited data was retained where not required.</p>
3g)	<p>Equifax processed direct marketing lists in accordance with Schedule 9 for the reporting period.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Direct marketing lists, where requested by a subscriber, are processed in accordance with Schedule 9. 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>
3h)	<p>Equifax undertook monitoring activities to ensure suppression,</p>	<p>Equifax conducted monitoring activities to ensure that suppression requests were processed in</p>

Section	Equifax Assurance Response	Commentary
	<p>release or cancellation requests are processed in accordance with Schedule 7 for the reporting period.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>accordance with Schedule 7.</p> <p>Equifax confirms that when an individual lodges 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>All suppressions are monitored to ensure that an extension request is performed on the basis of the evidence provided by the individual and taking into consideration the individual's situation on a case by case basis.</p>
3i)	<p>Equifax undertook monitoring activities to ensure complaints are processed in accordance with clause 8 for the reporting period.</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.</p> <p>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>
3j)	<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 reporting period.</p> <p>The Assurance Review Committee provides reasonable assurance of compliance with this requirement.</p>	<p>Equifax complied with all Code requirements in respect to its website. The Equifax website www.mycreditfile.co.nz is continually refreshed, 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>
3k)	<p>Equifax's subscribers complied with agreements and controls reporting period.</p>	<p>Equifax's credit bureau services for New Zealand subscribers are contingent on subscribers completing a comprehensive on boarding process,</p>

Section	Equifax Assurance Response	Commentary
	The Assurance Review Committee provides reasonable assurance of compliance with this requirement.	<p>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</p>
3l)	<p>During this reporting period 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>	Equifax previously provided access to credit information to intelligence and security agencies where the request fell within a permitted disclosure in Rule 11(c). Intelligence and security agencies are subject to the standard subscriber agreement and controls adopted by Equifax.
3m)	<p>During this reporting period 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>	Equifax has set out above the various monitoring it does on its subscribers and itself to ensure compliance with the Code. In the last reporting period Equifax has only provided services once in relation to tracing under Schedule 10 of the Code, and on this occasion ensured that the Schedule 10 requirements were met.

3.3 Schedule 6 Clause 4 Assurances

Assurances relating to action taken on deficiencies

Section	Equifax Assurance Response	Commentary
4a)	During this reporting period 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	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

Section	Equifax Assurance Response	Commentary
	<p>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>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>
4b)	<p>During this reporting period, 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>Following the completion of the review by the Independent Person for the current reporting period, general recommendations for improvement have been received. The Assurance Review Committee has formally adopted these recommendations and provided for their capture in the Corrective Actions Register. Response plans and actions to implement and appropriately track completion have been identified and owners have been assigned to ensure that these Corrective Actions are completed.</p>

4. Additional Questions

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

Additional Question	OPC Request	Equifax Response & Commentary
1)	<p>Accuracy</p> <p>The bulk of complaints this Office receives about credit reporters relate to the accuracy of credit information credit reporters hold on individuals and failures to action correction requests. This reporting year we received three such complaints/enquiries about Equifax. Individuals are encouraged to attempt to resolve any concerns around accuracy with the credit reporter in the first instance. We have received complaints where the inaccuracy was clear cut and could have been resolved earlier. As we do not have any insight into how credit reporters manage these complaints or assess inaccuracies we would appreciate some further information.</p> <p><i>We would like to know: - How have the amendments to Equifax's data matching logic last year improved accuracy, how often is this logic reviewed and have there been any further amendments? - Given the growing number of subscribers, have Equifax made any amendments to its review process?</i></p>	<p>Equifax has complied with its obligations regarding complaints under clause 8 of the Code.</p> <p>If a customer raises a complaint directly with us, we investigate this in order to resolve the issue.</p> <p>On occasion, a complaint may be received via a subscriber if a consumer has contacted them in the first instance. Depending on the source of the complaint or the reason for it, the investigation undertaken involves either contacting the relevant subscriber or verifying our records internally. If this results in an amendment to the individual's credit file we supply them with a copy of their amended credit file.</p> <p>In rare instances where the individual is not happy with the outcome of an investigation (even if we have properly investigated their complaint) the matter is further reviewed to ensure compliance has been met. This often happens where the consumer has asked for an amendment we have not made, such as removing a legitimate default.</p> <p>Matching is core to our business and is subject to continuous review and improvement. Equifax is currently undergoing a transformation project and smart matching is the foundation of the transformation.</p> <p>This new capability will be deployed with the new credit exchange in the cloud and is intended to be ready for use by the end of 2021. This solution will incorporate fuzzy matching algorithms and can be configured to suit different matching scenarios. The deep dive review of the matching logic carried out last year and continuous review of individual mismatch cases have been contributing to the design and the configuration of this new capability.</p> <p>Ensuring our information is accurate is in the common interest of our business and our</p>

Additional Question	OPC Request	Equifax Response & Commentary
		stakeholders, including subscribers, consumers and the OPC.
2)	<p>Retention/Disclosure</p> <p><i>Last year Equifax's Independent Reviewer noted it would be advisable for Equifax to review its retention and disclosure policies and assess whether it was necessary to have a New Zealand specific one. We would like to know: - What were the outcomes of the review?</i></p>	<p>Equifax is compliant with the Code obligations regarding retention and disclosure of credit information.</p> <p>In 2019 Equifax undertook a project where all PI/Credit data held on premise in New Zealand was identified and appropriate business retention rules were agreed upon. This is held in the Data Retention Register.</p> <p>Following this project, Equifax built retention processes to purge data objects older than the prescribed dates set out in the register. The high level process is identical to the Australian process but the specific objects and business rules are different.</p>
3)	<p>Landlord access to comprehensive credit reporting</p> <p><i>We have received a number of enquiries about subscribers who act as tenancy vetting agencies accessing individuals credit reports on behalf of prospective landlords. We understand these subscribers are provided access to comprehensive credit information whereas landlords generally only receive negative credit information. We would like to know: - What information are these subscribers provided and what compliance checks have been undertaken against these types of agencies?</i></p>	<p>Equifax does not supply landlords with comprehensive credit reporting information ("CCR").</p> <p>When CCR became permitted the retail credit industry (under RCANZ), including credit reporters, agreed to the principles of reciprocity ("POR").</p> <p>The POR was established to encourage credit providers to share CCR to enable more accurate credit decisioning and ensure fairness amongst all participants.</p> <p>Under the POR a subscriber must provide CCR to a credit reporter in order to receive CCR for the assessment and management of credit.</p> <p>The POR also establishes that a credit reporter is not permitted to provide CCR to a subscriber that has not supplied CCR. Landlords cannot supply CCR and therefore are not able to receive CCR.</p>
4)	<p>Hardship</p> <p><i>Due to the significant financial impacts on individuals from COVID-19 we would be interested to know:</i></p>	<p>Hardship may be reported by a credit provider in their monthly CCR file submission as an account or payment status. There was an increase in reported Hardship cases during the</p>

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	<p>- Whether Equifax has sought any additional assurances from its subscribers to monitor the accuracy of this information?</p>	<p>2019 year as lenders and industry applied more consistent reporting of Hardship cases.</p> <p>With the anticipated economic impact of COVID 19 on consumers' finances, credit providers and credit reporters aligned on reporting standards using the RCANZ industry data standard.</p> <p>Specifically, guidelines were established to allow the effective reporting of credit line payment deferrals, particularly in the case of mortgage accounts, ensuring deferrals taken out by borrowers who were up to date on their payments, were not reported as Hardship cases.</p> <p>These guidelines have enabled the effective reporting and monitoring of Hardship and Deferrals as distinct data sets.</p>
5)	<p>Initial suppression arrangement <i>Earlier this year the three credit reporters entered into an initial suppression arrangement would be interested to know if there are any issues with the arrangement?</i></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> <p>The credit reporters spent time negotiating how the sharing of information would work, and agreed on implementation of a system that was both workable and complied with the Code.</p> <p>We are pleased to report that the process has been working well and there have been no issues with the arrangement or engaging with the other credit reporters.</p>

<End of Report>