

CENTRIX GROUP LIMITED

**ASSURANCE REPORT TO
THE PRIVACY COMMISSIONER**

**FOR THE PERIOD
1 JULY 2020 TO 30 JUNE 2021**

**In accordance with Clause 8 and Schedule 7 of the
Credit Reporting Privacy Code 2020**

1 Purpose of Assurance Report

Centrix Group Limited (“Centrix”) is a credit reporter for the purposes of the Credit Reporting Privacy Code 2020 (“Code”). This report is provided to the Privacy Commissioner as required by Clause 8 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 2020 to 30 June 2021 (“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

In accordance with Clause 8(3)(c) of the Code, the statement from the independent person, Mrs Janine Jackson’s is provided as 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 2020 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.
- 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, Customer Services staff including the supervisor and the IT Operations Manager. Due to Covid-19 lockdown provisions, interviews were conducted by way of Zoom meetings rather than in person.

4. Reasonable Assurances

Having completed the review, Centrix provides the following reasonable assurances for the period 1 June 2020 to 30 June 2021 ("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 policies in place to ensure that any arrangements with a related company accords with clause 4(2) of the Code
CI 2(b)

Centrix has not entered into any such arrangement with a related company.

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(c)

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 CI 2(d) Centrix had appropriate procedures in place to ensure that any information requested under rule 6 is received only by the individual or their duly authorised agent

Centrix enters into agreements with designated organisations to provide for them to act as the agent of the individual to obtain specific credit information. The agreements contain explicit provisions to limit the use of the individual's credit information by the agent to ensure access is in accordance with Rule 6 and it cannot be used for any marketing purposes.

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

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

Refresher training on the Code policies, procedures and controls was undertaken during the Period including all updates to the Staff Policies Handbook to coincide with the introduction of the new Privacy Act 2020 and the Credit Reporting Privacy Code 2020.

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

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.

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 2(g) Centrix ensured that access agreements under Schedule 4 were in place before disclosing credit information

Centrix currently has not entered into any Access Agreement with an intelligence or security agency to date and accordingly the Review Committee gives this assurance.

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

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(f), 2(g), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l), 3(m).

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 continued with an ongoing 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 either related to credit account or 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 CI 3(d) 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.

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 and during the Period, on average, Centrix received approximately 325 access requests a day. There was one case that prompted an enhancement to the matching logic where two previously merged files have been burst they cannot be remerged in the future. This was due to two individuals having identical names, date of birth and both lived in Christchurch. Their files had remerged thus providing grounds for complaint and while it took 6 weeks to effect a solution both the OPC and individual were kept informed throughout the process. At the end of the process, the OPC wrote and confirmed the case closed as they accepted Centrix had resolved the matter to the complainant’s satisfaction.

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, the system enhancement implemented during the period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(e) 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.

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 CI 3(f) 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

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 Schedule 10.

Centrix has documented policies and procedures in accordance with the requirements of Schedule 10.

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 8.

Each quarter, monitoring for compliance with Schedule 8 (suppression process) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

[3]

Centrix continues 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.

Centrix entered into a tripartite agreement in March 2020 with Equifax and illion to share initial requests for suppression to align with Schedule 8 clause 1.4 of the Code and as reported last year the vast majority of individuals opt in for this service.

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

Reasonable Assurance CI 3(i) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed complaints in accordance with Clause 7.

[4]

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

Reasonable Assurance CI 3(j) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix' website displayed accurate information that gave effect to rules 6(7)(b), 7(5)(b) clause 7(4) and clause 8.1 of Schedule 8.

The website displayed all the required information (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.
CI 3(k)

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)

Centrix currently has not entered into any Access Agreement with an intelligence or security agency to date and accordingly the Review Committee gives this assurance.

Reasonable Assurance Centrix ensured the requirements under Schedule 11 in relation to tracing individuals were met.
CI 3(m)

Centrix has documented policies and procedures in accordance with the requirements of Schedule 11.

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

Not applicable.

5 Additional Information Sought From the Privacy Commissioner

Accuracy

- *Have there been any changes since the last assurance reporting round outlining steps taken by Centrix to improve its data matching logic?*

Centrix is currently undertaking redevelopment of its matching software to further enhance this critical function. As New Zealand does not allocate national identity numbers to individuals, matching relies on algorithms utilising name, date of birth, driver's license number and addresses often provided in an unformatted form and from multiple sources thus providing the opportunity for mismatches.

Since the last reporting round Centrix has implemented a feature that prevents two individuals files being remerged that have been previously split even when subsequent data uploads would normally result in the merge of the two files again. This can occur when an external data provider uploads personal information mixing up two individuals (usually by shared addresses) that was sourced from another third party.

Centrix is continuing to develop further changes to the key matching logic architecture that will accommodate individuals who have single character first names or surnames and individuals with a mononym (single name) which is a change from the generally accepted naming convention of having a last name plus one or more first names made up of at least two letters each. While the development is expected to be completed by early Q2, 2022 the ongoing challenge will be getting uniformity across all credit providers and credit reporters systems to accommodate, match and report names in these formats.

Correction

- *Please provide a breakdown of the types of corrections requested and the measures put in place to avoid reoccurrence.*

Centrix has identified four main types of correction requests being:

- Credit accounts not being closed at end of term
- Credit account payment status not correct such as being reported in Hardship when not
- Defaults not being updated in a timely manner

- Defaults duplicated when credit provider transfers or sells the default to another party such as a debt collector

Centrix has an ongoing program to work with subscribers to minimise such events including changes to error and warning messages on data loads and monitoring for out of order occurrences.

- *How do the results differ from last year?*

There was an increase in the number of requests from individuals in total numbers and as a percentage compared to the previous year reflecting the significant increase in the numbers of credit accounts (CCR) now being reported coupled with a higher level of consumer awareness particularly in the COVID year where many individual's sought Hardship relief. Centrix business has also materially grown representing an increase in activity and consumer file access.

- *Is there a repeat subscriber offender that isn't complying with its accuracy obligations under the subscriber agreement?*

Not that we are aware of.

Complaints of breach

As a credit reporter, Centrix must deal with complaints in a fair, simple, speedy manner with the aim of an efficient resolution of complaints. Centrix maintains its procedures comply with Rules 6 and 7 as the independent person reviewed the monitoring activities undertaken to ensure information privacy requests were processed in accordance with Rules 6 and 7, including reviewing the Compliance Reports, Code Compliance Committee Papers and Minutes and found no issues.

The scheduled monitoring undertaken during the Period and the review undertaken showed compliance with Rules 6 and 7 except for some occasions where the 20 working day time limit was not met. This was generally due to the data providers needing to investigate claims of fraud which can take some time.

The Request for Corrections Register is reviewed by Centrix management on a regular basis and all requests for removal of credit accounts or defaults that are denied are independently verified by Centrix management.

In regards to the investigating disputes involving credit account and credit default data, Centrix is relying of provisions contained in its subscriber agreements with the data provider in accordance with Schedule 3 of the Code to ensure they update credit information to ensure it is accurate, up to date, complete and not misleading. There are some subscribers who prefer to deal with the individual directly as this means they can discuss the issue in greater detail rather than relaying it through an intermediary. This means they do not have to pass on any more information to the bureau than is necessary. Further these subscribers supply their credit data to all three credit reporters so if they need to correct the information they will update all at the same time. It should be noted that this only occurs when the individual is not prepared to put their dispute in writing. If Centrix does receive a written complaint the process is to log it in the Request for Corrections Register, suppress the disputed information, forward it to the credit provider involved and monitor the progress of the investigation to its conclusion.

Fraudulent subscriber

- *For fraudulent matters, state what steps are in place to show how these matters are escalated and given priority to the complainant wishing to have their file investigated and information corrected?*

During the Period Centrix received 26 complaints directly from individuals in regards to fraudulent activity on their credit file and each of these were attended to promptly with the initial response being made the same day written notification is received. Each case is managed depending on its circumstances such as if it is a single incident or one involving multiple subscribers. Further any data relating to suspected fraudulent activity is suppressed while it is under investigation.

Centrix does not undertake the actual fraud investigation as this is carried out by the credit provider themselves as we are not privy to all of the information the credit provider has in their possession going back to the initial application. Also each credit provider may have a different process to investigate fraud cases as ultimately they will bear the loss. As noted above under Complaints of breach if the individual raises the claim of fraud with us directly we will monitor the progress of the credit providers investigation but the first time we are aware of a fraud in the majority of cases is when we receive instructions from the credit provider to delete a particular record because it was found to be a case of fraud and we have not had any previous interaction with the individual.

- *What has been done to ensure obligations under the subscriber agreement are being met?*

In the vast majority of cases subscribers cooperate with Centrix with regards to investigating complaints and on some rare occasions, Centrix has taken the steps to permanently delete disputed information unilaterally where it is known there are other fraudulent entries on the individual's credit report.

- *What measures does Centrix have in place to pick up instances of impersonation?*

Centrix screens all requests for access by individuals under Rule 6 in an attempt to prevent instances of impersonation. This includes verifying the proof of identity provided where possible and matching to existing data on the credit report such as addresses. In some cases the individual is contacted to verify details from the access request and answer security questions.

Subscriber access (by prospective landlords/real estate agencies)

- *What compliance checks are in place to tenant vetting agencies?*

The Credit Reporting Privacy Code limits the disclosure of comprehensive credit information to externally regulated credit providers and registered insurers and landlords/real estate agencies do not fall under either category. Further Centrix is a signatory to the Principles of Reciprocity for Comprehensive Credit Reporting Agreement dated 8 March 2013 whereby it can only disclose comprehensive credit information to subscribers who supply their own credit account information which again landlords and real estate agencies do not qualify.

Accordingly, Centrix can confirm it does not allow any landlord/real estate agency subscriber to access comprehensive credit reported information and only provides them negative information.

Centrix undertakes compliance checks on subscribers throughout the year including landlords/real estate agencies with one component being the ability to demonstrate the individuals consent was obtained prior to the credit enquiry.

Dated 19 October 2021



Keith McLaughlin
Managing Director and
Chairman Review Committee

Schedule 1

Janine Jackson Statement

I, Janine Jackson, was previously 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. I held several 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 me to understand and ensure the bureau complied with the Information Privacy Principles. During this period, I established the first Privacy Department in the Baycorp credit bureau operations, which increased consumer awareness and minimised complaints through implementing policies and processes. I 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, I 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. I 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 my previous experiences in the operations of a New Zealand credit bureau and complying with the Privacy Act, including the Code, I have significant experience in IT and HR audit, risk and compliance in other financial industries. I am currently employed by Suncorp New Zealand Ltd (parent company to Vero New Zealand Ltd) as a Manager – Operational Excellence and held a prior role with Vero as Executive Manager People Solutions and Partnering, and Executive Manager - IT Support Services. Part of my 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. Also, in my role with the human resources (HR) department, I was also responsible for privacy of information, compliance and standards of outsourcing partners, payroll and employee records. My current role also requires me to review processes across the organisation for best practice and simplification. I have been active in participating in 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.

I not only have experience in Code compliance, but also have significant experience in audits in the insurance industry according to the applicable New Zealand and Australian regulations.

Since commencement of the requirement for an annual assurance report from credit reporters, I have been the independent person on the Centrix review committee. My

involvement and actions in the 2021 review include (but not limited to) an independent review of the assurance report framework and process documentation, investigation of any anomalies identified, review of controls, sighting of evidence, review of compliance committee minutes, monitoring activities, policies, staff hand book and website. Due to Covid lockdown I was unable to physically attend the Centrix offices, however, had virtual access to the relevant staff members to provide responses to any of my queries and/or recommendations. I also participated in the sign off meeting of the final assurance report to OPC.

I also confirm that I am not (and never have been) an employee, director, or owner of Centrix, nor do I provide any other services to Centrix.



Janine Jackson

Dated: 29th September 2021

Signed:

Schedule 2

Summary of Information Reviewed

Information	Assurances
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(c)
Agency Access agreements in place during the period under review.	CI 2 (d)
The Code information, policies and the training undertaken by staff during the period under review and the staff acknowledgement forms.	CI 2(e)
The standard subscriber agreements in place during the period under review.	CI 2(f)
The subscriber on-line sign up processes.	CI 2(a), 2(c), 2(f)
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), 2(c), 2(d)
Application for suppression request and reviewed the process that was followed.	CI 2(a), 2(c), 3(h)
Information security policies, procedures and reports.	CI 2(a), 2(c)
Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), 2(c), 3(d), 3(e), 3(i)
Centrix' website.	CI 3(j)
Compliance monitoring procedures.	CI 2(a), 2(c) 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), 3(m)
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), 3(m)
All Compliance Committee papers, meeting minutes, Compliance Reports, Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), 2(c) 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), 3(m)