



# **illion (New Zealand) Limited**

## **Assurance Report**

Under Clause 8 and Schedule 7 of the Credit Reporting Privacy Code for the year ending 30 June 2021

September 2021

666 Great South Road, Penrose, Auckland

[illion.co.nz](http://illion.co.nz)

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## 1. Introduction

- 1.1. The Credit Reporting Privacy Code 2020 (the **Code**) requires credit reporters to provide a report (the **Report**) to the Office of the Privacy Commissioner (the **OPC**) each year.<sup>1</sup>
- 1.2. The report must meet the requirements contained in the code.<sup>2</sup> The Code requires the report must provide assurance that a credit reporter is compliant with the code and has sufficient assurance mechanisms. These requirements include that the credit reporter has policies in place to comply with the code, it monitors compliance, and where it identifies issues, that it works to resolve those issues.
- 1.3. This Report covers the period from 1 July 2020 to 30 June 2021. It was prepared by an independent person alongside illion (the **Review Committee**).
- 1.4. The Review Committee was formed in compliance with the requirements of the Code.

## 2. The Review Committee

- 2.1. The review committee is made up of the following members:
  - Stephen Blyth, Privacy Compliance Officer
  - Byron Gatt, Head of Client Operations
  - Richard Poole, as Independent Person.
- 2.2. Information about Mr Richard Poole is set out in Appendix One. Mr Poole is not, and has never been, an employee, director, or owner of illion. He is independent of illion and has had no role in its compliance programme. Aside from his role as Independent Person, for this review, he has never advised or provided services to illion on any matter.
- 2.3. The review committee have followed an agreed process (the **Assurance Procedure**).

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<sup>1</sup> Clause 8.

<sup>2</sup> Specifically, the requirements contained in schedules 7 and 9 (5).

### 3. The Assurance Procedure

- 3.1. This report is intended to provide a high-level but complete assurance review. It sets out statements to the OPC regarding illion's compliance with its obligations under the Code. Referenced policies, procedures, and controls have been sighted, reviewed and compliance is confirmed where applicable.
- 3.2. This Report breaks down the requirements of the Code into the individual components, and the supporting documentation relating to those components. It gives the title of the document(s) containing the policy, procedure or control, and outlines the Independent Person's commentary on illion's compliance with them and the Code.

## 4. Summary Assurance

Assurances relating to policies, procedures, controls and subscriber agreements.		
	Assurance Area	Requirement Met
2 (a)	Did illion have policies in place that give effect to the requirements of the Code?	Yes
2 (b)	Did illion have policies in place to ensure that any arrangement with a related company accords with clause 4(2) of this Code?	Yes
2 (c)	Did illion have internal procedures and controls to give effect to the policies and requirements of the Code?	Yes
2 (d)	Did illion have 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 procedures 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)?	Yes
2 (e)	Did illion provide information and training to staff to ensure compliance with the policies, procedures, and controls?	Yes
2 (f)	Did illion ensure subscriber agreements comply with Schedule 3 and are they in place before disclosing credit information?	Yes
2 (g)	Did illion ensure access agreements under Schedule 4 were in place before disclosing credit information?	Yes

<b>Assurances relating to monitoring of policies, procedures, controls and subscriber agreements.</b>		
	<b>Assurance Area</b>	<b>Requirement Met</b>
3 (a)	Did illion monitor that it followed its own policies, procedures and controls?	Yes
3 (b)	Did illion monitor that information held by illion was protected by reasonable security safeguards?	Yes
3 (c)	Did illion monitor that it processed information privacy requests in accordance with rules 6 and 7?	Yes
3 (d)	Did illion take such measures as were reasonably practicable to avoid the incorrect matching of information held by the credit reporter?	Yes
3 (e)	Did illion ensure the information held by the credit reporter was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading?	Yes
3 (f)	Did illion ensure reporting and retention of credit information was in accordance with rule 9 and Schedule 1?	Yes
3 (g)	Did illion process direct marketing lists in accordance with Schedule 10?	Not applicable for this period
3 (h)	Did illion process suppression, release or cancellation requests in accordance with Schedule 8?	Not applicable for this period
3 (i)	Did illion process complaints in accordance with clause 7?	Yes
3 (j)	Did illion's website display accurate information giving effect to rules 6(7)(b), 7(5)(b), clause 7(4) and clause 8.1 of Schedule 8?	Yes
3 (k)	Did illion ensure subscribers complied with agreements and controls?	Yes
3 (l)	Did illion ensure the intelligence and security agencies complied with any access agreements and controls?	Not applicable for this period
3 (m)	Did illion ensure the requirements on both the subscribers and the credit reporter under Schedule 11 in relation to tracing individuals were met?	Not applicable for this period
5 (Sch 9)	Did illion undertake monitoring activities to ensure that they only reported small defaults relating to an overdue payment equal to or more than \$100?	Yes



<b>Assurances relating to an action taken on deficiencies identified.</b>		
	<b>Assurance Area</b>	<b>Requirement Met</b>
4 (a)	Did illion identify any breaches of an agreement, policy, procedure, control, or requirement of the code during its systematic reviews, monitoring activities or as a result of a complaint and then investigate that breach and where appropriate, take prompt remedial action?	Yes
4 (b)	Did illion, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Yes

## 5. Specific Assurance

- 5.1. illion’s core business activities are compliant with the code and assurance activities exist to monitor code compliance. illion has appropriate policies and procedures in place and monitors those effectively. Interviewed staff were confident about their individual obligations and demonstrated an understanding of the importance of adhering to illion’s policies.
- 5.2. It is noted that illion has developed and documented an extensive data quality program, the review committee encourages illion to continue to refine this process to cater for receiving information from subscribers with different data sets and processes. This will allow illion to continuously enhance its data quality.
- 5.3. In response to the findings of the OPC’s inquiry into illion’s arrangements with Credit Simple, illion has taken steps to ensure that it complies with the Code. A summary of these steps is included in Appendix Two.

<b>Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
2 (a)	Did illion have policies in place that give effect to the requirements of the Code?	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Compliance Training Policy</li> <li>• IT Security Policy</li> <li>• Bureau (Credit Reporter) Access Policy</li> <li>• Employment Agreements</li> <li>• Public Access Centre Procedures Matrix</li> </ul>	Yes	<p>illion has policies and procedures in place to give effect to the requirements of the Code. Expectations for staff are clearly outlined in employee agreements. Mandatory training is provided for all employees during onboarding and annually. Training attendance is monitored, and escalation processes are in place for non-compliance.</p> <p>The Public Access Centre Procedures Matrix contains detailed guidance about how consumer requests should be handled, as well as rules for matching linked credit reports.</p>



<b>Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
2 (b)	Did illion have policies in place to ensure that any arrangement with a related company accords with clause 4(2) of this Code?	<ul style="list-style-type: none"> <li>• Product Schedule</li> </ul>	Yes	<p>illion has established appropriate practices to ensure that product developments/changes ensure that a related company's actions are consistent with the Code obligations on the illion credit reporter.</p> <p>illion has a policy to limit the access and use of its credit reporter information to employee's that are authorised to use that information for permissible purposes, this applies to all employees including those of related companies.</p>
2 (c)	Did illion have internal procedures and controls to give effect to the policies and requirements of the Code?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures Matrix</li> <li>• Privacy Breach Response Plan</li> <li>• Information Security Policy</li> </ul>	Yes	<p>The Public Access Centre Procedures Matrix outlines the procedures to be following for handling consumer requests.</p> <p>Both the Public Access Centre Procedures Matrix and Privacy Breach Response Plan explain how privacy breaches should be managed.</p> <p>The Information Security Policy and supporting sub-policies provide detailed guidance on maintaining effective security measures.</p> <p>The results of non-compliance for staff are included in each of the relevant policies.</p>

<b>Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
2 (d)	Did illion have 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 procedures 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)?	<ul style="list-style-type: none"> <li>Public Access Centre Procedures Matrix</li> </ul>	Yes	<p>The majority of access requests are processed via automated systems that include appropriate identification of the individual making the request.</p> <p>The Public Access Centre Procedures Matrix contains detailed guidance on how manual access requests should be handled.</p>
2 (e)	Did illion provide information and training to staff to ensure compliance with the policies, procedures, and controls?	<ul style="list-style-type: none"> <li>Compliance Training Policy</li> </ul>	Yes	<p>Mandatory training is provided during employee onboarding and on an annual basis. Non-compliance is monitored and escalated for follow-up action.</p> <p>All staff interviewed had completed their mandatory training. Reminders about training and the importance of following procedures are provided to employees on a regular basis.</p>



<b>Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
2 (f)	Did illion ensure subscriber agreements comply with Schedule 3 and are they in place before disclosing credit information?	<ul style="list-style-type: none"> <li>• Master Services Agreement</li> <li>• Product Schedule</li> </ul>	Yes	<p>illion's Master Services Agreement and Consumer Risk Services Product Schedule together comprise the subscriber agreement. Collectively they give effect to the requirements of Schedule 3. illion will only disclose credit information to a subscriber after they have entered into a subscriber agreement.</p>
2 (g)	Did illion ensure access agreements under Schedule 4 were in place before disclosing credit information?	<ul style="list-style-type: none"> <li>• Master Agreement within the credit reporting services product module</li> </ul>	Yes	<p>Customers are only allowed access once they have agreed to the Subscriber Agreement. Code aspects of these terms and conditions remain non-negotiable.</p>

**Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements**

	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
3 (a)	Did illion monitor that it followed its own policies, procedures and controls?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures Matrix</li> <li>• Data Quality Procedures</li> </ul>	Yes	<p>Public Access Centre employee activity is monitored by Team Leaders, this includes reviewing call recordings, standard response templates, and tracking activity levels.</p> <p>illion’s Data Quality Procedures outline regular reports that are run to track consumer data quality issues. These include high-level reports for management review.</p> <p>As noted above, the review committee encourages illion to continue to refine its Data Quality process to cater for receiving information from subscribers with different data sets and processes. This will allow illion to continuously enhance its data quality.</p>

<b>Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
3 (b)	Did illion monitor that information held by illion was protected by reasonable security safeguards?	<ul style="list-style-type: none"> <li>• Information Security Policy</li> <li>• Public Access Centre Procedures Matrix</li> </ul>	Yes	<p>illion's security framework is aligned with ISO 27001. Policies are in place to ensure that server, network, and user activity are monitored, and that anomalous activity is investigated.</p> <p>Security training is mandatory for all employees on an annual basis. Non-compliance is monitored and escalated for follow-up action.</p> <p>All staff interviewed had completed their mandatory training. Reminders about training and the importance of following procedures are provided to employees on a regular basis.</p>
3 (c)	Did illion monitor that it processed information privacy requests in accordance with rules 6 and 7?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures Matrix</li> </ul>	Yes	<p>Public Access Centre employee activity is monitored by Team Leaders, this includes reviewing call recordings, standard response templates, and tracking activity levels.</p> <p>Registers are maintained of requests and outcomes; these are monitored to ensure that requests are being handled correctly.</p>

<b>Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
3 (d)	Did illion take such measures as were reasonably practicable to avoid the incorrect matching of information held by the credit reporter?	<ul style="list-style-type: none"> <li>Public Access Centre Procedures Matrix</li> </ul>	Yes	<p>illion uses sophisticated rank and match techniques to match information. Matching information is illion's core business. These techniques balance the inherent tension between providing accurate matches yet complete and accurate information.</p> <p>The Public Access Centre Procedures Matrix contains guidelines for handling manual matching of records.</p>
3 (e)	Did illion ensure the information held by the credit reporter was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading?	<ul style="list-style-type: none"> <li>Public Access Centre Procedures Matrix</li> </ul>	Yes	<p>illion uses sophisticated rank and match techniques to match information. Matching information is illion's core business. These techniques balance the inherent tension between providing accurate matches yet complete and accurate information.</p>
3 (f)	Did illion ensure reporting and retention of credit information was in accordance with rule 9 and Schedule 1?	<ul style="list-style-type: none"> <li>System software</li> </ul>	Yes	<p>illion's core systems automatically dispose of records according to automated rules that are established in accordance with the Code requirements.</p>
3 (g)	Did illion process direct marketing lists in accordance with Schedule 10?	Not applicable during the reporting period.		
3 (h)	Did illion process suppression, release or cancellation requests in accordance with Schedule 7?	<ul style="list-style-type: none"> <li>Public Access Centre Procedures Matrix</li> </ul>	Yes	<p>The Public Access Centre Procedures Matrix has detailed procedures for dealing with suppression requests.</p>

<b>Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
3 (i)	Did illion process complaints in accordance with clause 8?	<ul style="list-style-type: none"> <li>Complaint Handling Procedure.</li> </ul>	Yes	<p>illion has a complaint handling procedure that aligns with the Standards for Complaints Handling AS/NZS 10002:2014. Its website has clear instructions for making a complaint.</p> <p>All escalated complaints are registered and reviewed for systemic themes and whether they reveal broader issues.</p>
3 (j)	Did illion's website display accurate information that gave effect to rules 6(7)(b), 7(5)(b), clause 7(4) and clause 8.1 of Schedule 8?	<ul style="list-style-type: none"> <li>illion.co.nz</li> </ul>	Yes	illion's website displays accurate information.
3 (k)	Did illion ensure subscribers complied with agreements and controls?		Yes	<p>When new subscribers are onboarded product profiles are established. illion frequently reviews that a customer's usage matches their declared use case and product profile.</p> <p>illion also monitors complaints for any trends or non-compliance.</p>
3 (l)	Did illion ensure the intelligence and security agencies complied with any access agreements and controls?	Not applicable during the reporting period.		

<b>Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements</b>				
	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
3 (m)	Did illion ensure the requirements on both the subscribers and the credit reporter under Schedule 11 in relation to tracing individuals were met?	Not applicable during the reporting period.		
5 (Sch 9)	Did illion undertake monitoring activities to ensure that they only reported small defaults relating to an overdue payment equal to or more than \$100?		Yes	<p>illion's core systems prevents the recording of default for amounts less than the amount permissible in the Code (now \$125) but previously \$100.</p> <p>The review of this information forms part of illion's standard data quality process.</p>



<b>Schedule 7 clause 4: Assurances relating to action taken on deficiencies identified in last year's report.</b>			
	<b>Assurance Area</b>	<b>Response</b>	<b>Commentary</b>
4 (a)	Did illion identify any breaches of an agreement, policy, procedure, control, or requirement of the code during its systematic reviews, monitoring activities or as a result of a complaint and then investigate that breach and where appropriate, take prompt remedial action?	Yes	No significant breaches were identified, individual complaints were handled in accordance with illion's dispute resolution process, which includes contributing to process improvement and operator coaching where relevant. illion's data quality team identified an issue with a credit provider who was no longer providing updates for their records. After investigation, illion decided to prevent the associated data being shared as part of the credit reporting information.
4 (b)	Did illion, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Yes	1) Refer to Appendix Two for details of action taking in response to the OPC's review into Credit Simple.  2) In response to the recommendation (made in the 2020 Assurance Report) to document their monitoring program, illion has developed and documented an extensive data quality program.  3) In response to the recommendation (made in the 2020 Assurance Report) to improving complaint handling by using dedicated tools, illion appointed a designated resource responsible for complaint handling. Plans are in place to provide weekly leadership updates and to integrate an appropriate mechanism for better tracking and visibility.



## Appendix One:

Richard is a Senior Consultant for TwoBlackLabs, specialising in privacy. He has worked in privacy both in-house and externally, as a consultant. He also holds CIPM, CIPP/E, and CIPT accreditations from the International Association of Privacy Professionals.



## Appendix Two:

In response to the OPC's findings from the inquiry into illion's relationship with Credit Simple, illion have taken several steps to address the concerns raised in the report.

In July-September 2020, illion has ceased the following in relation to Credit Simple:

- Credit Alerts
- Sending e-mail offers from partners to Credit Simple members
- Adding any new partner offers to the Credit Simple website
- Advertising Credit Simple to consumers in order to obtain new Credit Simple members
- Onboarding new Credit Simple partners or taking new offers from existing partners
- Showing any offers on its website
- Listing the Credit Simple App on Apple iTunes and Google App stores.

During the reporting period, Credit Simple's Privacy Policy and Terms of Use had not been updated to reflect these changes. As of August 2021, both have been updated to reflect the current services offered by Credit Simple.