



# Equifax New Zealand Information Services and Solutions Limited

Assurance Report

Year ending 30 June 2021

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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.

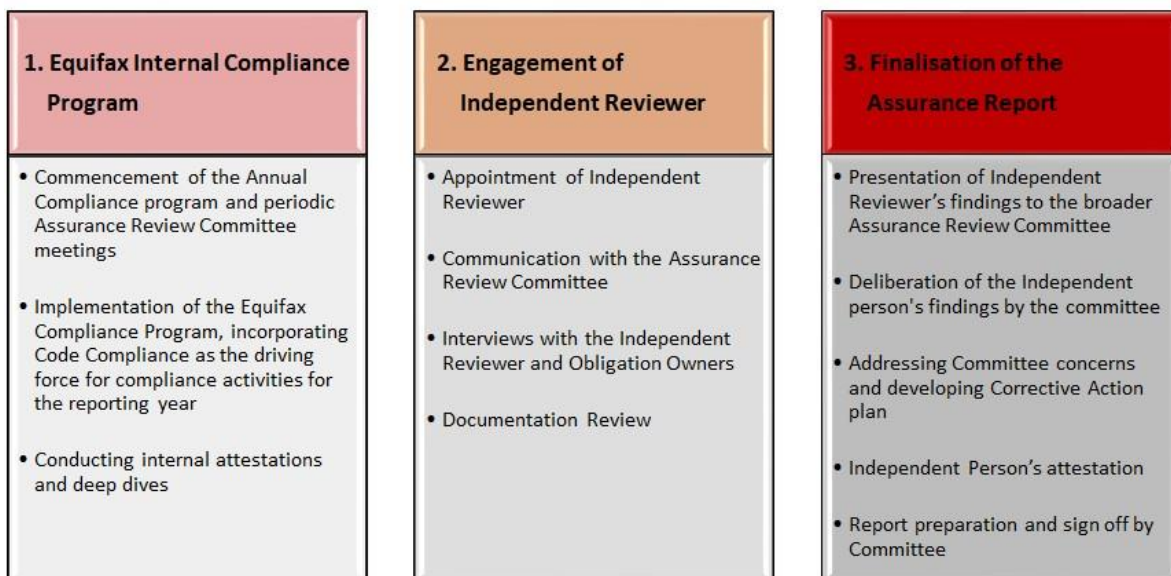
Clause 8 of the Credit Reporting Privacy Code 2020 (**Code**) mandates that Equifax provide an annual report (this **Assurance Report**) to the Privacy Commissioner prepared in accordance with the requirements of Schedule 7 of the Code. Equifax is also required to provide supplementary information in 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 8(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 2020 to 30 June 2021 (**Reporting Period**) in respect of Equifax's systematic review and monitoring processes. This report provides the Assurance Review Committee's overall conclusions and assurance on compliance with the Code for the Reporting Period.

## 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:



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 7, as well as the Independent Person.

Process to undertaken to gain assurance:

<b>Step</b>	<b>Process Description</b>
Step 1: Attestations	<p>The assurance process uses Equifax’s internal Compliance Program to enable periodic attestations of obligations and controls, by the Obligation and Control Owners. These were facilitated by the Compliance Officer and all results and findings were escalated to the Assurance Review Committee.</p> <p>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.</p>
Step 2: Independent review	<p>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 Schedule 7 of the Code.</p> <p>This was done through document reviews and interviews.</p> <p><i>Note: Documents reviewed include a selection of evidence required for the purpose of obtaining reasonable assurance. This includes, but is not limited to, policies and procedures, guidelines, monitoring and review results, complaints, registers, access rights, website content, templates and application forms.</i></p>
Step 3: Review of results	<p>The results of both the attestation and review process were presented to the Assurance Review Committee for discussion, along with any recommendations and improvements.</p> <p>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.</p>
Step 4: Assurance report	<p>The Assurance report prepared 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. This report was approved by the Assurance Review Committee and Independent Person.</p>

## 2.2 Assurance Review Committee

Equifax has engaged an Assurance Review Committee to oversee the preparation of this Assurance Report. 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 7 (so as to enable a higher standard of reasonable assurance) and was assisted by a review and report from the Independent Person<sup>1</sup>.

The Assurance Review Committee was comprised of the following members:

<b>Angus Luffman (Chair)</b>	Managing Director, New Zealand
<b>Alana Hampton</b>	General Manager - Compliance, Australia and New Zealand
<b>Wayne Williamson</b>	Vice President, Head of Security, Australia and New Zealand
<b>Gazali Hammard</b>	Business Information Security Officer
<b>Deborah Malaghan</b>	Head of Legal, New Zealand
<b>Bob Sparshatt</b>	Chief Data Officer, Australia and New Zealand
<b>Sahil Gupta</b>	Head of Data Delivery
<b>Teresia Lai</b>	Head of Data Ingestion
<b>Paul Dunne</b>	General Manager - Customer Services, Australia and New Zealand
<b>Nick Foster</b>	Head of Solutions and Marketing Services
<b>Geoff Hawkins</b>	Risk and Assurance Manager, Australia and New Zealand
<b>Suellen Heintz</b>	General Manager, Product and Market Development
<b>Jasdeep Singh</b>	Compliance Officer
<b>Deanne Myers</b>	Independent Person
<b>Ben Scully</b>	Independent Person

The Assurance Review Committee is a valuable governance body at Equifax that facilitates robust discussion relating to Code compliance and control enhancements. The Independent Person's contribution 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, 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;

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<sup>1</sup> The Independent Person's scope was to provide an external view on internal policies, processes and frameworks when reviewing compliance with the Code.

- Reviewed and updated the Code obligations register on a regular basis;
- Conducted desktop reviews of documented policies and procedures, guidelines, monitoring and review results, complaints, registers, access rights, website material, 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 deliberation and review sessions.

### 2.3 Independent Person

Equifax again retained the services of its 2019-2020 reporting year Independent Person for this Reporting Period, reappointing Deanne Myers and Benjamin Scully from INFO by Design Limited. This 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 operations.

Neither Deanne Myers, nor Ben 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 for the purposes of conducting the independent review). 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 qualified and experience professional advisor with expertise in privacy, assurance and risk with over 17 years' of experience working with a wide range of public and private organisations and sectors in both New Zealand and internationally. She is a member of the International Association of Privacy Professionals (**IAPP**) as well as a Certified Internal Auditor and member of the Institute of Internal Auditors.

Her broader privacy experience includes management and development of KPMG's privacy service line in New Zealand, development and application of the Government Chief Privacy Officer's Privacy Maturity Assessment Framework (**PMAF**), and management and delivery of methodologies for privacy maturity and risk assessments, privacy training, privacy policy and procedures, breach response design and assessment and privacy framework development.

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

His broader privacy experience includes working at New Zealand Qualifications Authority (**NZQA**) as an in-house lawyer where he dealt with privacy law and privacy issues as an in-house lawyer and a strong understanding of the Privacy and Official Information Acts including exposure to Privacy Impact Assessments, advising on privacy statements and disclaimers, responding to complaints made under the Privacy Act and dealing with privacy breaches.

Both Deanne and Ben confirm their independence.

### 2.4 Independent Reviewer's Report Summary

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

1. Review of documentation provided by Equifax, while onsite at Equifax's Auckland office, and off-site. One hundred and thirty-two (132) documents were reviewed and assessed against the requirements of the Code.
2. Interviews with key staff. Fourteen (14) interviews were held, with additional assistance provided by Equifax's Compliance Officer as required.

3. Assessment of the policies, processes and controls identified through the review of documentation and interviews, against the requirements of the Code. This assessment included establishing whether reasonable assurance of compliance with Equifax's obligations could be determined.
4. Where evidence of compliance was not provided or opportunities for improvement were identified, a risk assessment was undertaken. This risk assessment considered the likelihood of non-compliance with Equifax's obligations under the Code. Recommendations that reflect this risk assessment were then developed

Overall, the Independent Person concluded that, in relation to the reporting period, there was sufficient evidence that Equifax was in compliance with the obligations of the Code relating to their:

- Policies, procedures, controls and subscriber agreements
- Monitoring of policies, procedures, controls and subscriber agreements, and
- Actions taken on deficiencies identified

Generally, Equifax's internal assurance processes are based on the three lines of defence, in line with accepted good practice. The quantity of second line of defence compliance checking and monitoring that has been undertaken over the last year has however been limited when compared to previous years. This reflects challenges Equifax has had in terms of resourcing and the disruption caused by the COVID-19 situation. This apparent gap in assurance activities is at least partially filled by other second line activities (such as quality assurance checking and management oversight) however there remain gaps in compliance checking as compared with previous years.

Over the next year, compliance activity is scheduled to increase. This can be attributed at least in part to the appointment of a New Zealand Compliance Officer. This, when considered in conjunction with other assurance activities, will provide much better information on Equifax's compliance with the Code. Overall, there was no increased risk of non-compliance due to the processes and controls and monitoring that was done outlined in sections 3.2 and 3.3 which lead to the conclusion that there are no indications of non-compliance with the Code or of Equifax not meeting its obligations. The Independent Reviewer is of the opinion that Equifax is well placed to continue to be able to provide reasonable assurance over its compliance with the Code.

### 3. Summary of Assurances

This section contains a summary of the assurances required under the Code with a response from Equifax and the findings of the Independent Person.

#### 3.1 Schedule 7 Section 1 Assurances

##### Process of review and reporting

Section 1	Expectation per the Code	Equifax Assurance response
(a)	The report must include a summary of the systematic review process and the methodology followed by the reviewer.	Refer to section 2.1 of this Assurance Report which outlines the assurance and review process and methodology followed by Equifax. The Independent Person's review process is outlined in section 2.4 of this Assurance Report.
(b)	The report must include a statement identifying the members of the review committee, including the independent person.	Refer to section 2.2 of this Assurance Report which identifies the members of the review committee, along with the Independent Persons from Info by Design Limited.
(c)	The report must include a statement from the Independent Person confirming their independence, summarising their expertise and outlining their involvement with the assurance process and preparation of the report.	Refer to section 2.3 of this Assurance Report which notes a confirmation from the Independent Persons confirming their independence as well as a summary of their expertise. Refer to section 2.1 outlining the assurance process including the involvement of the Independent. Further elaboration has been included from the Independent Person in section 2.4.
(d)	The report must include a confirmation that the independent person is not an employee, director, or owner of the credit reporter.	Refer to section 2.3 of this Assurance Report which includes a statement noting that the Independent Person is not an employee, director or owner of the credit report.



### 3.2 Schedule 7 Section 2 Assurances

#### Assurances relating to policies, procedures, controls and subscriber agreements

Section 2	Expectation per the Code	Findings of the Independent Person and Equifax
(a)	In relation to the applicable period, Equifax had policies in place that give effect to the requirements of the Code.	<p>Equifax has a comprehensive suite of policies at a global and regional level. These policies give effect to the requirements of the Code. Compliance with these policies and associated procedural documents is mandatory.</p> <p>The revised 'Privacy Policy' is comprehensive, reflective of the 2020 Privacy Act and Code changes. It has been approved and is in the process of being rolled out across the organisation.</p>
(b)	In relation to the applicable period, Equifax had policies in place to ensure that any arrangement with a related company accords with clause 4(2) of this Code.	<p>Equifax had policies in place to ensure that any arrangements with related companies accord with clause 4(2) of the Code.</p> <p>All policies are clearly identified as being either A/NZ or New Zealand-specific or being Global in application. Company-specific policies may also be created if there is a regulatory reason to differ from group-wide policies; however, these require review and approval prior to being implemented.</p>

(c)	<p>In relation to the applicable period, Equifax had internal procedures and controls in place to give effect to the policies and requirements of the Code.</p>	<p>Equifax had internal procedures and controls in place to give effect to the policies and requirements of the Code. The policies are supported by detailed process and guidance documentation.</p> <p>Responsibilities for policies (development, compliance, and monitoring) are well understood.</p> <p>Compliance is supported by organisation-wide and team-based training; including at onboarding.</p> <p>Compliance with policies and procedural documentation is mandatory and monitored through a variety of means:</p> <ul style="list-style-type: none"> <li>• First line oversight and review;</li> <li>• Second line management oversight (risk framework, quality assurance monitoring); and,</li> <li>• Third line (internal audit and this independent review).</li> </ul> <p>There is an attestation process whereby obligation owners report on the procedures and controls implemented to give effect to the policies and requirements of the Code.</p> <p>Processes for identifying, reporting and monitoring non-compliance are embedded throughout the business.</p>
(d)	<p>In relation to the applicable period, Equifax had appropriate procedures in place to ensure that any information requested under Rule 6 is received only by that individual or, where the request is made by an agent on behalf of that individual, only by that individual or his or her agent.</p>	<p>Equifax's processes for access requests include verification of the identity of individuals, confirmation of contact details, requirements for privacy waivers from third parties and secure sending of information (for example, passwords are required to open credit reports, PINs are required to action Suppression requests).</p> <p>Documentation (both for internal use and for individuals to understand their rights) is comprehensive and well understood.</p> <p>Internal processes to ensure these are actioned appropriately are also comprehensive and well understood, results are reported, and compliance is monitored.</p>

(e)	In relation to the applicable period, Equifax provided information and training to its staff to ensure compliance with the policies, procedures and controls.	<p>Equifax provides information and training to its staff to ensure compliance with the policies, procedures and controls. In addition to the information provided to staff via Equifax's policies and procedures, training is delivered to staff and contractors to ensure compliance with the policies, procedures and controls. This includes both online training modules and training delivered to specific teams.</p> <p>Further online training modules are being, or have been developed, and are to be rolled out across the NZ operation during the 1 July 2021 – 30 June 2022 reporting period.</p> <p>The content is appropriate in terms of the Code and Equifax's policies, procedures and controls. Content is targeted at appropriate areas (i.e. Privacy Impact Assessments, Compliance, Privacy 101, Credit Reporting).</p> <p>Completion of training is monitored and non-completion or ongoing lack of assessed understanding is escalated to management for resolution.</p>
(f)	In relation to the applicable period, Equifax ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information.	Equifax executes subscriber agreements that complied with Schedule 3 with its subscribers before disclosing credit information. The Operations team do not provide access to Equifax's systems until an agreement is executed, and the subscriber has met the on-boarding requirements.
(g)	In relation to the applicable period, Equifax ensured that access arrangements under Schedule 4 were in place before disclosing credit information.	<p>A new Access Agreement was recently created; it still requires consent from individuals applying to join the intelligence and security agency.</p> <p>Equifax disguise the footprint from being shown on the customer's credit file, preventing the footprint of the agency being shown.</p> <p>The NZ Security Intelligence Service signed up to this access agreement in the current reporting period.</p>

### 3.3 Schedule 7 Section 3 Assurances

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

Section 3	Expectation per the Code	Findings of the Independent Person and Equifax
(a)	<p>In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax followed its own policies, procedures and controls.</p>	<p>During this Reporting Period, Equifax undertook the following assurance activities: quality assurance monitoring, internal audit, risk management processes, breach and incident reporting, and support from the Compliance team in case of queries or issues. As noted above, there is an extensive set of policies and procedures for staff to follow when undertaking any activity related to the Code. These documents are comprehensive and are supported by training.</p> <p>Incidents (including CRPC-related incidents) are tracked through the Compliance Incidents Register.</p> <p>Corrective actions are documented within the Corrective Actions Register.</p> <p>Limited compliance checking and monitoring was undertaken by the Continuous Control Monitoring team during the Reporting Period, as a result of resourcing challenges and COVID-19. Rather, Equifax relied on other monitoring and assurance processes, such as quality assurance checking, management oversight and Code compliance attestation process. However, compliance activity is scheduled to increase in the 1 July 2021 – 30 June 2022 reporting period. This, when considered in conjunction with other assurance activities, will provide additional challenge to, and review of, Equifax’s control environment.</p>
(b)	<p>In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that the information held by Equifax was protected by reasonable security safeguards.</p>	<p>During the period, the information held by Equifax was protected by reasonable security safeguards. There is a comprehensive security framework in place; including risk assessment and response during design, and both external and internal monitoring, testing and response.</p>

(c)	<p>In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed information privacy requests in accordance with rules 6 and 7.</p>	<p>Equifax undertook monitoring activities to ensure reasonable compliance with the Code, including that Equifax processed information privacy requests in accordance with rules 6 and 7.</p> <p>Documentation (both for internal use and for individuals to understand their rights) is comprehensive and well understood. Internal processes to ensure these are actioned appropriately are also comprehensive and well understood, results are reported, and compliance is monitored.</p>
(d)	<p>In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax took such measures as were reasonably practicable to avoid the incorrect matching of information held by Equifax.</p>	<p>Equifax undertook monitoring activities in relation to the incorrect matching of information. Equifax applies matching criteria for both manual and automated matching.</p> <p>Matching accuracy and control is reported regularly to governance committees. Root cause analysis of specific cases of incorrect matching is undertaken and informs matching criteria and process.</p> <p>Analysis of data relating to accuracy (including matching accuracy) is undertaken monthly and shows this is improving each month. Specific concerns are appropriately escalated.</p> <p>Equifax is currently working to improve its data matching as part of its technology and business transformation efforts.</p>

(e)	<p>In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that the information held by Equifax was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading.</p>	<p>Equifax undertook monitoring activities to ensure that it was accurate, up to date, complete, relevant and not misleading.</p> <p>Checks to ensure accuracy are built into the change management process, including the privacy impact assessment process.</p> <p>Requirements for quality, accuracy, completeness and timeliness of data provided to Equifax are included in subscriber agreements and ensured by checks run over data before it is imported.</p> <p>Data analysis is undertaken regularly. The criteria include compliance with specified values (which include accuracy and timeliness). Results of the analysis are reported monthly and show trends and changes over time. Accuracy is shown to be improving continually.</p> <p>A new subscriber audit process has been designed to be deployed in the 1 July 2021 – 30 June 2022 reporting period.</p>
(f)	<p>In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax's reporting and retention of credit information was in accordance with Rule 9 (<i>Retention of credit information</i>) and Schedule 1 (<i>Maximum reporting periods</i>).</p>	<p>The retention requirements have been documented for internal Equifax use. The data team reviews compliance with specified criteria, including retention periods. Much of this is automated, with manual checks also applied.</p> <p>Retention periods are embedded in the systems, and there is no ability for staff to override these.</p> <p>Equifax has proactively identified minor updates that are required to the retention rules and these are being updated. The updates will result in full compliance with the requirements of the Code.</p>
(g)	<p>In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed direct marketing lists in accordance with Schedule 10</p>	<p>Equifax monitored the processing of direct marketing lists appropriately.</p> <p>Controls are in place to ensure that requests are only processed when received from approved subscribers, these are processed only when set criteria are met, compliance is monitored, and the requirements are explicitly communicated to subscribers.</p>

(h)	In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed suppression, release or cancellation requests in accordance with Schedule 8.	There is a process description and a suppression request policy in place which outlines the following: <ul style="list-style-type: none"> <li>• Process for granting suppressions</li> <li>• Process for termination/cancellation of suppressions</li> <li>• Embedding a temporary release policy process.</li> <li>• PIN verification and ID verification processes</li> </ul>
(i)	In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed complaints in accordance with Clause 7.	Equifax processes complaints in accordance with Clause 7 of the Code, as: <ul style="list-style-type: none"> <li>• Responsibilities for dealing with complaints are clear and well understood;</li> <li>• The Complaints Procedure is documented and consistent with all the requirements of clause 7; and</li> <li>• The Summary of Rights is made available to complainants and is on Equifax's website.</li> </ul> <p>Compliance is monitored through an attestation process and reporting. Processes for identifying, reporting and monitoring non-compliance are embedded throughout the organisation.</p>
(j)	In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax's website displayed accurate information that gave effect to rules 6(7)(b), 7(5)(b) and clause 8.1 of Schedule 8.	Equifax's website displays accurate information consistent with Code requirements.

(k)	In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that subscribers complied with agreements and controls.	<p>Equifax undertook appropriate monitoring activities to ensure reasonable compliance with the Code, including to ensure that subscribers complied with agreements and controls.</p> <p>Subscriber obligations, including the obligation to cooperate with Equifax’s monitoring requirements, are made clear to subscribers. Equifax has implemented automated and ad hoc monitoring of compliance and responds to identified non-compliance (including suspension of subscriber accounts where appropriate).</p> <p>The subscriber audit process is documented for internal use. This document specifies the scope of each subscriber review.</p>
(l)	In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that the intelligence and security agencies complied with any access arrangements and controls.	<p>There was one self-reported instance where a subscriber agreement was not located. A new agreement has therefore subsequently been put in place, which has had input from the Privacy Commissioner.</p> <p>The management attestation process covers this agreement and it has also been reviewed by Internal Audit. Equifax intends to refine its ongoing monitoring activities during the next reporting period.</p>
(m)	In relation to the applicable 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>This is actioned through a standard contract.</p> <p>Activities to ensure compliance are completed in a number of ways, including pre-screening, specific T&amp;Cs for subscribers, the completion of privacy impact assessments for any newly acquired datasets, and the suppression process automatically flows through Equifax systems to prevent inconsistencies.</p> <p>As noted earlier, compliance reviews are scheduled to increase over the next reporting period. This will include the testing of subscriber compliance to their contracts.</p>



### 3.4 Schedule 7 Section 4 Assurances

#### Assurances relating to an action taken on deficiencies identified

Section 4	Expectation per the Code	Findings of the Independent Person and Equifax
(a)	<p>In relation to the applicable period, where, during its systematic reviews, monitoring activities or as a result of a complaint, Equifax identified a breach of an agreement, policy, procedures, control, or requirement of the code, Equifax investigated that breach and, where appropriate, took prompt remedial action.</p>	<p>Where Equifax identified a potential breach of an agreement, policy, procedures, control, or requirement of the code, Equifax investigated the matter and, where appropriate, took prompt remedial action.</p> <p>A corrective actions register is used by Compliance to track breaches, incidents and progress made on recommendations made as a result of audit, review or investigation.</p> <p>Responsibilities in relation to breaches and complaints are known and understood, and responsibilities, processes and reporting are comprehensively documented.</p>
(b)	<p>In relation to the applicable period, where a deficiency was identified in the previous year's report, Equifax, where appropriate, took prompt remedial action.</p>	<p>Recommendations made during the last year reporting year received appropriate attention. There was one action in progress at the time the assurance process was conducted in relation to the Privacy Policy.</p> <p>The Privacy Policy has been updated, approved through Equifax's policy governance process, and is in the process of being published on Equifax's website.</p>

#### 4. Additional Questions

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

OPC Additional Info Request	Equifax Response	Independent Person comment
<p><b>Accuracy:</b>            Have there been any changes since the last assurance reporting round outlining steps taken by Equifax to improve its data matching logic?            - if yes, please detail            (Please note we request the independent reviewer to verify the safeguard to be able to give us the assurance).</p>	<p>Equifax has undertaken monitoring of incorrect matching activities. There is regular reporting on matching accuracy and controls to the governance committee.</p> <p>We note that we have sophisticated matching rules in place to ensure accuracy. However, Equifax is currently working to improve its data matching further as part of its technology and business transformation through our focus on the new cloud-based bureau to be launched in 2022.</p> <p>As part of this transformation program we plan to adopt Data Fabric Keying and Linking services that enable advanced matching techniques which can be easily configured in the matching rules compared to our current matching logic which requires a great deal of code development.</p> <p>We have not noted a large amount of data matching errors coming through this Reporting Period, but where they do occur, they are captured and corrected immediately.</p>	<p>We have verified the existing safeguards (i.e. those deployed prior to the DLM Data Fabric project). Match rates are very good.</p> <p>Existing safeguards reviewed include policy and process documentation, criteria for automated and manual matching, and Equifax's internal monitoring processes and reporting of accuracy.</p> <p>We agree with Equifax's comments relating to its data matching initiative under its business and technology transformation program.</p>

<p><b>Correction:</b> A breakdown of the types of correction requested and what measures Equifax have put in place to avoid reoccurrence</p> <ul style="list-style-type: none"> <li>- how do your results differ from last year is there a repeat subscriber offender that isn't complying with its accuracy obligations under the subscriber agreement?</li> </ul>	<p>The corrections that have taken place in the Reporting Period predominately relate to:</p> <ul style="list-style-type: none"> <li>• defaults,</li> <li>• mixed or confused files involving either twin files or where two individuals share the same or similar identity details, and</li> <li>• account status updates which are received from subscribers in relation to comprehensive credit reporting information regarding their customer.</li> </ul> <p>Default corrections equate to 24% of all consumer bureau corrections, while mixed file corrections equate to approximately 17% of all consumer bureau corrections, with 49% of these received from credit providers as account status corrections.</p> <p>Below is a list of the different types of corrections we receive:</p> <ul style="list-style-type: none"> <li>• Confused/mixed files</li> <li>• Correction of defaults</li> <li>• Incorrect or incomplete PI or CI information</li> <li>• Correction of inquiry information</li> <li>• Correction of insolvency and judgement information</li> <li>• Close/remove accounts</li> <li>• Update account status</li> </ul> <p>There has not been a shift with respect to correction types as compared to last year.</p> <p>Equifax has not observed a repeat subscriber offender that isn't complying with its accuracy obligations. In the case that we note there has been a correction made due to inaccurate information from a subscriber, the subscriber is informed once we have corrected the information and the reason for it for further reference.</p>	<p>We have verified the processes noted by Equifax.</p>
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<p><b>Complaints of breach:</b></p> <p>What assurance and timeliness can you provide to show the following:</p> <ul style="list-style-type: none"> <li>- Complaints are acknowledged and responded to within the specified time frames under the Code,</li> <li>- The complaints can have many components to them. What assurances can be provided to show these components are each being acknowledged and replied to properly,</li> <li>- Provide details relating to your policies and processes for transferring complaints to third parties for correction and are there different processes for different correction requests?</li> <li>- Provide comparison of how Equifax's responses have adhered to the CRPC from 2018/19 and 2019/20.</li> </ul>	<p>Complaints are dealt with as a high priority by senior staff members and management. All complaints are acknowledged within the 5 business day requirement of the Code and an extension sent within 10 working days of the acknowledgement being sent if Equifax requires more time to investigate the complaint.</p> <p>A majority of Equifax complaints relate to corrections. When individuals request for Equifax to amend/remove information on their credit file, the request is investigated by our Corrections Officer. The Corrections Officer will liaise with our subscribers (third party) to ensure the information on the bureau is correct to remain. If the subscriber cannot substantiate the listing, it is removed, and the consumer notified. If the subscriber can substantiate the listing, the information remains, and the consumer notified. The consumer is also given the option of adding a Statement of Correction to their file if the information is not removed.</p> <p>All complaints are also passed through the Compliance Officer to ensure that there is no breach of the Code that need to be reported to the OPC. These are assessed on a case by case basis and any corrective action as a result of the complaint is noted in the corrective actions register. If it is determined that there is a potential breach, the Head of Legal is notified and the matter is assessed to determine if it should be reported to the OPC in line with the 2020 Privacy Act changes.</p>	<p>We have verified the processes noted by Equifax.</p>
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<p><b>Fraudulent subscriber:</b> 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?</p> <ul style="list-style-type: none"> <li>- Have any changes been put in place over the past year to streamline complaints relating to identity theft and credit fraud cases?</li> </ul>	<p>Complaints of fraud usually result in a consumer placing a suppression on their credit report which is processed within 24 hours of the suppression request being received.</p> <p>If the consumer decides to dispute the information on their file with Equifax, it is sent to our Corrections Officer who investigates the matter as a priority. This process has remained unchanged since the last reporting year. The Compliance Officer is also involved, if required, noting the priority to ensure that we are in line with our internal policies as well as the CRPC 2020.</p>	<p>We have verified the processes noted by Equifax.</p> <p>Compliance testing was not undertaken this year. However, we have confirmed the 24-hour window is in place.</p>
<p><b>Fraudulent subscriber:</b> What has been done to ensure obligations under the subscriber agreement are being met?</p> <ul style="list-style-type: none"> <li>- If subscriber information is incorrect (and therefore non-compliant and in violation of the Code) what steps are being taken to ensure that subscriber information is accurate, particularly when it is known there are fraudulent entries on an individual's credit report?</li> </ul>	<p>In addition to formal compliance monitoring of subscriber access, the call centre and account managers review subscriber accounts while providing services. In the event of any non-compliance, staff will raise this and correct it. An account may be suspended where compliance is not undertaken voluntarily.</p> <p>We do not generally come across fraud by subscribers, only usually errors or omissions. The predominate fraud type we observe at Equifax is identity theft. In other words, where a consumer's identity is stolen, and another individual uses it to obtain credit. In these instances, Equifax will work with both the consumer and the third parties who appear on the credit file, to investigate the matter and correct inaccurate information that should not be on the credit bureau.</p>	<p>We have verified the processes noted by Equifax.</p>

<p><b>Fraudulent subscriber:</b>  What measures does Equifax have in place to pick up instances of impersonation?</p> <ul style="list-style-type: none"> <li>- For example where an individual impersonates another individual and gets access to their credit report.</li> </ul>	<p>When a case is identified, an incident is raised, and the issue is investigated.</p> <p>Two groups that are at risk of impersonation are subscribers and consumers.</p> <p>To identify fraudulent subscribers during the onboarding piece – Equifax has in place criteria that must be met to proceed with if the subscription as part of its on-boarding process. If these controls are not met, the subscription is not provided. As stated above, if staff identify suspicious activity while providing services, staff will raise this for investigation.</p> <p>To identify fraudulent conduct during the provision of credit information to consumers, Equifax requires that consumers meet its identification verification processes before any credit information is released.</p> <p>We also note that impersonation is now an offence under section 212 of the <i>Privacy Act 2020</i>.</p>	<p>We have verified the processes noted by Equifax.</p>
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<p><b>Subscriber access:</b> What compliance checks are in place to tenant vetting agencies?</p> <ul style="list-style-type: none"> <li>- Show how the credit reporter ensures only negative information is given to prospective landlords/ real estate agents.</li> <li>- How does Equifax ensure credit checks are only done for prospective tenants?</li> </ul>	<p>Tenant vetting agencies are only permitted to use T1/T2 access which is access set up to pre-screen prospective tenants. To receive comprehensive (positive) credit information, a client must be configured with a reciprocity code to define the level of access. Tenant vetting agencies would have no configuration defined, thus would have no access to comprehensive credit information. They are only provided negative credit information which includes negative only credit scores.</p> <p>The subscriber application form requires landlords to provide to us a copy of their standard tenancy agreement. The application form also requires landlords to agree to only use our services for a prospective tenant or guarantor. Like other subscribers, their use is subject to ongoing monitoring.</p>	<p>We have verified the processes noted by Equifax.</p> <p>We did not complete any testing with respect to the tenancy industry specifically.</p>
<p><b>Independent reviewer</b> We are looking for assurances the independent reviewer to not simply check written policies but to also demonstrate how they have examined the credit reporting system.</p>	<p>NA</p>	<p>The process undertaken during the Independent Review this year to examine the credit reporting system included:</p> <ul style="list-style-type: none"> <li>• Review of documentation provided by Equifax (covering policies, procedures, internal reporting, internal assessment and reviews, training modules, and registers and trackers)</li> <li>• Interviews with key staff; including walk-throughs of systems and demonstration of key controls</li> <li>• Assessment of the policies, processes and controls identified through the review of documentation and interviews, against</li> </ul>

		<p>the requirements of the Code. This assessment included establishing whether reasonable assurance of compliance with Equifax's obligations could be determined.</p> <p>We note that we were unable to perform detailed sample testing as requested by the OPC in the additional requirements that were provided due to time constraints.</p>
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#### 4. Additional Questions

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

OPC Additional Info Request	Equifax Response	Independent Person comment
<p><b>Accuracy:</b>            Have there been any changes since the last assurance reporting round outlining steps taken by Equifax to improve its data matching logic?            - if yes, please detail            (Please note we request the independent reviewer to verify the safeguard to be able to give us the assurance).</p>	<p>Equifax has undertaken monitoring of incorrect matching activities. There is regular reporting on matching accuracy and controls to the governance committee.</p> <p>We note that we have sophisticated matching rules in place to ensure accuracy. However, Equifax is currently working to improve its data matching further as part of its technology and business transformation through our focus on the new cloud-based bureau to be launched in 2022.</p> <p>As part of this transformation program we plan to adopt Data Fabric Keying and Linking services that enable advanced matching techniques which can be easily configured in the matching rules compared to our current matching logic which requires a great deal of code development.</p> <p>We have not noted a large amount of data matching errors coming through this Reporting Period, but where they do occur, they are captured and corrected immediately.</p>	<p>We have verified the existing safeguards (i.e. those deployed prior to the DLM Data Fabric project). Match rates are very good.</p> <p>Existing safeguards reviewed include policy and process documentation, criteria for automated and manual matching, and Equifax's internal monitoring processes and reporting of accuracy.</p> <p>We agree with Equifax's comments relating to its data matching initiative under its business and technology transformation program.</p>

<p><b>Correction:</b> A breakdown of the types of correction requested and what measures Equifax have put in place to avoid reoccurrence</p> <ul style="list-style-type: none"> <li>- how do your results differ from last year</li> <li>is there a repeat subscriber offender that isn't complying with its accuracy obligations under the subscriber agreement?</li> </ul>	<p>The corrections that have taken place in the Reporting Period predominately relate to:</p> <ul style="list-style-type: none"> <li>• defaults,</li> <li>• mixed or confused files involving either twin files or where two individuals share the same or similar identity details, and</li> <li>• account status updates which are received from subscribers in relation to comprehensive credit reporting information regarding their customer.</li> </ul> <p>Default corrections equate to 24% of all consumer bureau corrections, while mixed file corrections equate to approximately 17% of all consumer bureau corrections, with 49% of these received from credit providers as account status corrections.</p> <p>Below is a list of the different types of corrections we receive:</p> <ul style="list-style-type: none"> <li>• Confused/mixed files</li> <li>• Correction of defaults</li> <li>• Incorrect or incomplete PI or CI information</li> <li>• Correction of inquiry information</li> <li>• Correction of insolvency and judgement information</li> <li>• Close/remove accounts</li> <li>• Update account status</li> </ul> <p>There has not been a shift with respect to correction types as compared to last year.</p> <p>Equifax has not observed a repeat subscriber offender that isn't complying with its accuracy obligations. In the case that we note there has been a correction made due to inaccurate information from a subscriber, the subscriber is informed once we have corrected the information and the reason for it for further reference.</p>	<p>We have verified the processes noted by Equifax.</p>
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