



illion (New Zealand) Limited

Assurance Report

Under Rules 5 and 8 and Clause 8 and Schedule 7 of the Credit Reporting Privacy Code for the year ending 30 June 2022

September 2022

666 Great South Road, Penrose, Auckland
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.¹
- 1.2. The report must meet the requirements contained in the Code.² The Code requires that the report must provide a reasonable 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 2021 to 30 June 2022. 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 Bureau Operations Services
 - Maddie Simmonds, Legal Operations Manager
 - Mark Carver, as Independent Person.
- 2.2. Information about Mr Mark Carver is set out in Appendix One. Mr Carver 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**).

¹ Clause 8.

² 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



Assurances relating to monitoring of policies, procedures, controls and subscriber agreements.		
		Requirement Met
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?	Yes
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



Assurances relating to an action taken on deficiencies identified.		
	Assurance Area	Requirement Met
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. Appropriate policies and procedures are in place and illion 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, as part of its continuous improvement program, had commenced this year initiatives to update and refine its Policy documents relating to Complaints and Corrections along with the Public Access Procedures Matrix. Due to their inherent linked nature these are being updated at the same time. A summary of changes to date includes:
- The Public Access Centre Procedures Matrix has been restructured into separate artefacts covering each procedure to simplify them and provide greater clarity to Public Access Centre staff.
 - The Complaints Handling Policy has been updated to better support staff in the resolution of complaints in an efficient, effective and transparent manner. It also recognises the varied regulatory obligations applicable to Complaints. It is noted that, as at the release date of the version of the Policy (2.0), illion's operational areas are refining their processes to reflect the terms of the Policy and those operational areas will be monitored regularly while these refinements are underway.
 - The Corrections Handling Policy has been created to better support staff with the investigation and resolution of correction requests efficiently, honestly and fairly and consistent with its obligations. It also recognises the varied regulatory obligations applicable to Corrections. It is noted that, as at the release date of the version of the Policy (1.1), illion's operational areas are refining their processes to reflect the terms of the Policy and those operational areas will be monitored regularly while these refinements are underway.
- 5.3. It is noted that illion has made significant staff resource investments in the Public Access Centre to assist with customer requests. Further, illion has appointed dedicated resources responsible for complaint handling.

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
2 (a)	Did illion have policies in place that give effect to the requirements of the Code?	<ul style="list-style-type: none"> • Code of Conduct • Compliance Training Policy • Information Security Policy • CCB Data Access Policy • Employment Agreements • Public Access Centre Procedures Matrix 	Yes	<p>illion has robust and mature policies and procedures in place to give effect to the requirements of the Code.</p> <p>Privacy expectations for staff are clearly outlined in employee agreements.</p> <p>All staff must complete mandatory training both during initial onboarding and then annually. Public Access Centre staff receive additional specific training relevant to their role. 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, covering access, correction, suppression, release, and cancellation of policies as well as rules for matching linked credit reports.</p>

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
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"> • Master Services Agreement • Product Schedule • CCB Data Access Policy 	Yes	<p>illion has established practices to ensure that a related company's actions are consistent with clause 4(2) of this Code and the obligations on illion as a credit reporter.</p> <p>illion's standard contract agreements have been developed by Legal to ensure they comply with the relevant obligations. Similarly non-standard agreements are reviewed and finalised by Legal to ensure they continue to satisfy the regulatory obligations.</p> <p>illion's CCB Data Access Policy specifically states that data access is by default prohibited for any other related company. Access and use of its credit reporter information is restricted to staff that are authorised to use that information for permissible purposes, this applies to all staff including those of related companies.</p> <p>Ongoing monitoring is undertaken to ensure compliance with the Code.</p>

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
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"> • Public Access Centre Procedures Matrix • Privacy Breach Response Plan • Information Security Policy • CCB Data Access Policy 	Yes	<p>The Public Access Centre Procedures Matrix outlines the procedures for handling consumer requests.</p> <p>Both the Public Access Centre Procedures Matrix and Privacy Breach Response Plan explain how privacy breaches are managed.</p> <p>The Information Security Policy provides detailed guidance on maintaining effective security measures.</p> <p>Effects of non-compliance and necessary procedures to follow for identified issues are included in each of the relevant policies.</p>

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
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"> Public Access Centre Procedures Matrix 	Yes	<p>Nearly all access requests are automatically processed via illion's on-line portal which include appropriate identification of the individual.</p> <p>The Public Access Centre Procedures Matrix includes robust, mature processes for handling any manual access requests received via the Public Access Centre (noting these are very limited compared with on-line portal access). The process includes set criteria for identifying an individual or their agent and handling any issues relating to identifying or linking an individual through the on-line portal.</p> <p>Public Access Centre staff receive appropriate training on how to handle access requests. illion have also added this year dedicated staff who primarily handle access requests.</p>

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
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"> • Compliance Training Policy 	Yes	<p>All staff must complete mandatory training both when initially onboarded and then annually. Training attendance is monitored, and escalation processes are in place for non-compliance. Public Access Centre staff receive additional specific training relevant to their role.</p> <p>Reminders about training and the importance of following procedures are provided to staff on a regular basis.</p> <p>All staff interviewed had completed their mandatory and additional specific training.</p>
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"> • Master Services Agreement • Product Schedule • Privacy Disclosures Statement 	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.</p> <p>In addition, prior to disclosing credit information to a subscriber, subscribers must also complete a Privacy Disclosure Statement form to assist in reminding a CP of the requirements of the Code.</p> <p>As part of the subscriber onboarding process the Client Integration Team ensures that all required agreements are in place and signed, until then illion will not disclose credit information to a subscriber.</p>



Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
2 (g)	Did illion ensure access agreements under Schedule 4 were in place before disclosing credit information?	<ul style="list-style-type: none">• Master Services Agreement• Product Schedule• Privacy Disclosures Statement	Yes	<p>Customers are only allowed access once they have agreed to the Subscriber Agreement and the Privacy Disclosure Statement. Code aspects of these terms and conditions remain non-negotiable.</p> <p>As part of the customer onboarding process the Client Integration Team ensures that all required agreements are in place and signed.</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
3 (a)	Did illion monitor that it followed its own policies, procedures and controls?	<ul style="list-style-type: none"> • Public Access Centre Procedures Matrix • Data Quality Procedures • Monthly Reports 	Yes	<p>Public Access Centre staff activity is monitored by both team leaders and managers, this includes reviewing call recordings, standard response templates, and tracking activity levels. Staff compliance with policies and procedures are also monitored.</p> <p>illion's Data Quality Procedures includes monthly reporting which tracks consumer data quality issues. These include high-level reports for senior management review.</p> <p>illion also operates in a manner of continuous improvement, to highlight and implement improvements to its policies, procedures and controls.</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
3 (b)	Did illion monitor that information held by illion was protected by reasonable security safeguards?	<ul style="list-style-type: none"> • Information Security Policy • Public Access Centre Procedures Matrix • Consumer Credit Bureau Data Access Policy 	Yes	<p>illion's Information Security Policy describes the guiding principles that ensure the confidentiality, integrity, and availability of illion's information assets and for the secure operation of IT resources. It documents the roles and responsibilities of all staff and addresses organisational security issues.</p> <p>illion's security policies are designed to comply with the ISO/IEC 27001:2013 standard. The security policy is reviewed at minimum annually.</p> <p>Information Security training is mandatory for all staff on an annual basis. Non-compliance is monitored and escalated for follow-up action.</p> <p>Staff that were interviewed confirmed that they had completed all information security training as part of their mandatory training.</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
3 (c)	Did illion monitor that it processed information privacy requests in accordance with rules 6 and 7?	<ul style="list-style-type: none"> Public Access Centre Procedures Matrix 	Yes	<p>The Public Access Centre Procedures Matrix contains detailed procedures in relation to information privacy access and correction requests.</p> <p>Public Access Centre staff activity is monitored by both team leaders and managers, 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> <p>In addition, the Privacy Steering Committee reports on access and correction request metrics as part of monthly reporting.</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
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"> • Public Access Centre Procedures Matrix • Data Quality Procedures 	Yes	<p>illion uses sophisticated, automated rank and match techniques to match information within illion’s systems. Matching information is illion’s core business.</p> <p>These techniques balance the need to provide accurate matches with complete and accurate information.</p> <p>The Public Access Centre Procedures Matrix contains guidelines for handling manual matching of records.</p> <p>The Data Quality Team perform regular reviews of sample data to check if there may have been any incorrect matching of information.</p> <p>Systems also provide alerts where matching issues arise.</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"> • Public Access Centre Procedures Matrix 	Yes	<p>illion uses sophisticated rank and match techniques to match information.</p> <p>The Public Access Centre Procedures Matrix contains guidelines for handling manual matching of records.</p> <p>The Data Quality Team perform regular reviews of sample data to check if there may have been any incorrect matching of information.</p> <p>Systems also provide alerts where matching issues arise.</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
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"> • System software 	Yes	<p>illion's core systems automatically dispose of records according to automated rules that are established in accordance with the Code's requirements.</p> <p>illion's DQ process tracks that systems operate in the manner they were designed as part of its review process.</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"> • Public Access Centre Procedures Matrix 	Yes	<p>The Public Access Centre Procedures Matrix has detailed procedures for dealing with suppression requests. Suppression requests are reported on daily.</p> <p>At present suppression requests are a manual process.</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
3 (i)	Did illion process complaints in accordance with clause 8?	<ul style="list-style-type: none"> Complaint Handling Procedure. 	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 to assist customers with making a complaint.</p> <p>All escalated complaints are reviewed for systemic themes and whether they reveal broader issues.</p> <p>illion has also introduced a dedicated complaints role responsible for processing complaints.</p> <p>As part of its continuous improvement program, illion has also instigated a program of work to review and update its complaints processes. This work is underway and will be finalised in the next reporting period.</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"> illion.co.nz 	Yes	illion's website displays accurate information.

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
3 (k)	Did illion ensure subscribers complied with agreements and controls?		Yes	<p>When new subscribers are onboarded product profiles are established. The Client Integration Team ensures all agreements are setup correctly.</p> <p>As part of its Data Quality process illion considers a customer's usage matches their declared use case and product profile.</p> <p>Along with tracking complaints and correction requests illion monitors and reports monthly on trends as a means of identifying 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.		
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 prevent the recording of small default amounts less than the amount permissible in the Code (now \$125) but previously \$100.</p>

Schedule 7 clause 4: Assurances relating to action taken on deficiencies identified in last year's report.			
	Assurance Area	Response	Commentary
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	<p>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.</p> <p>illion's Data Quality Team identified an issue where the bankruptcy report failed to run in a particular month and it was not discovered until the next report run. An automated alert subsequently introduced now notifies staff at the time of any issue.</p>
4 (b)	Did illion, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Yes	<p>In response to the previous year's recommendation to improving complaint handling, illion has appointed a designated resource responsible for complaint handling.</p> <p>illion has also instigated a program of work, which is ongoing, to review and update the complaint handling policy and process, this is expected to be finalised in the next reporting period.</p>



Appendix One:

Mark Carver is a Principal Consultant – Privacy for Mosaic FSI (<https://mosaicfsi.com>), specialising in privacy. Prior to joining Mosaic FSI he was a Director and Principal Consultant for TwoBlackLabs, founded in 2017 as a specialist privacy consultancy. He has worked in both privacy and security fields, as a consultant. Mark has not had any involvement with any previous assurance reports undertaken by TwoBlackLabs in previous years.