



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 2023

September 2023

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 2022 to 30 June 2023. 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
 - Ankit Srivastava, Manager – Public Access Centre
 - Laura Cooke, Manager - Client Services
 - 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 were 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.		
	Assurance Area	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. illion has well established, mature 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, as part of its continuous improvement program had made a number of improvements / changes this year. A summary of the changes includes:
- The Public Access Centre Procedures Matrix has been restructured into separate Procedures / Work Instructions covering each procedure. This simplifies the documents and provides greater clarity to Public Access Centre staff in relation to each Procedure / Work Instruction. The new Procedures / Work Instructions have been rolled out and respective training is included in a new on-line learning platform.
 - The automation of suppression, release and cancellation requests so that subscribers can request these through illion's website. This was in part in response to increased request volumes as a result of recent non-illion, publicised data breaches in Australia impacting both Australian and New Zealand consumers.
 - Additional daily reporting and data quality checks have been introduced to assist illion to provide greater analysis of trend and volume information, drive operational efficiencies, increase the accuracy of information processed and improve overall customer experience.
 - Introduced and filled a new Quality Assurance role within it Public Access Centre to review practices relating to Corrections and Complaints.
- 5.3. It is noted that illion has also made staff related investments. These include:
- Separating the consumer and client facing functions, previously undertaken by the Public Access Centre so that client functions are provided by the Client Services Team. This allows the Public Access Centre to focus on serving consumer requests.
 - Following the appointment of a dedicated resources in the Public Access Centre in the prior financial year illion has created a backup pool of staff that have been trained to assist in times of peak volumes. The introduction of the new Procedures / Work Instructions has also helped to reduce complaints.
 - Public Access Centre staff training now includes a buddy system to mentor new staff alongside formal training and the introduction of 1:1 personal development plans.



5.4. It is noted that in January 2023, illion divested Credit Simple to ClearScore. We note that ClearScore is an unrelated party to illion or any illion related party. This resulted in the complete shutdown of the Credit Simple platform on 31 July 2023. Credit Simple previously provided individuals with a means of accessing credit reporting information under a separate brand.

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 / Work Instructions 	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 at minimum. Public Access Centre staff receive additional, specific training relevant to their role. Training attendance is monitored, and appropriate actions are in place for non-compliance.</p> <p>The recently updated Public Access Centre Procedures / Work Instructions include detailed guidance and working instructions about how consumer requests should be handled, covering access, corrections, complaints, suppressions (initiation, extension and release) 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 the Code and the obligations on illion as a credit reporter.</p> <p>illion's standard contract agreements (which consist of the Master Services Agreement and Product Schedule) have been developed to ensure they comply with the relevant obligations. Similarly non-standard agreements are reviewed and finalised by illion's Legal team 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>

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 / Work Instructions • Data Breach & Cyber Incident Response Plan • Information Security Policy • CCB Data Access Policy 	Yes	<p>illion has well established, mature internal procedures and controls to give effect to the policies and requirements of the Code, these include:</p> <ul style="list-style-type: none"> • The Public Access Centre Procedures / Work Instructions details the procedures for handling consumer requests as well as work instructions covering other operational functions. • The Data Breach & Cyber Incident Response Plan sets out the roles and responsibilities of illion staff when detecting, responding to and managing data breaches, cyber incidents or near misses. • The Information Security Policy provides detailed guidance on how illion maintains effective security measures. • Policy non-compliance and necessary procedures to follow for identified issues are included in each of the relevant policies.

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 / Work Instructions 	Yes	<p>The majority of access requests are automatically processed via illion's on-line portal which includes appropriate identification of the individual.</p> <p>The Public Access Centre Procedures / Work Instructions include processes for handling any manual access requests received via the Public Access Centre.</p> <p>There is a specific procedure that 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.</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 appropriate actions are in place for non-compliance. Automated reminders about training and the importance of following procedures are provided to staff on a regular basis.</p> <p>Public Access Centre staff receive specific training relevant to their role. In addition, the Public Access Centre has introduced a buddy system to mentor new staff and it has also introduced individual development plans.</p> <p>Training is primarily delivered via illion's online training platform. The Public Access Centre Procedures / Work Instructions were added to the online training platform this year.</p> <p>It was confirmed that all staff had completed their mandatory and additional specific training.</p>

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
2 (f)	Did illion ensure subscriber agreements comply with Schedule 3 and were in place before disclosing credit information?	<ul style="list-style-type: none"> • Master Services Agreement • Product Schedule • Privacy Disclosure 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>
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 / Work Instructions • 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 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. Data quality improvements introduced during this year include:</p> <ul style="list-style-type: none"> • Reporting threshold alerts where given queries are out of normal operating parameters. • Daily reporting of trends and volumes of consumer contacts within the Public Access Centre. • The data quality reporting system was re-platformed to support the extended business requirements.

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 • Data Breach & Cyber Incident Response Plan • Public Access Centre Procedures / Work Instructions • 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>The Data Breach & Cyber Incident Response Plan sets out the roles and responsibilities of illion staff when detecting, responding to and managing data breaches, cyber incidents or near misses. The plan is tested where illion undertakes a mock exercise facilitated by an external party.</p> <p>illion's security policies are designed to comply with the ISO/IEC 27001:2013 and SOC2 standards. The security policy is reviewed at minimum annually. The standards are also audited annually by an external party.</p> <p>Information Security training is mandatory for all staff on an annual basis (delivered via the online training platform). Non-compliance is monitored and addressed appropriately.</p> <p>It was confirmed that all staff 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 / Work Instructions 	Yes	<p>The Public Access Centre Procedures / Work Instructions contain 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>As noted previously illion has introduced a QA process into the Public Access Centre that monitors operators against the various procedural documents.</p> <p>Registers are maintained of requests and outcomes; these are monitored to ensure that requests are being handled correctly.</p> <p>Daily trend reporting within the Public Access Centre has been introduced to assist with allocation of resources to respond to queries.</p> <p>In addition, the Privacy Steering Committee reports on access and correction request metrics as part of monthly reporting. The Privacy Steering Committee is facilitated by the Privacy Compliance Officer and attended by the CEO, Chief Finance Officer, Chief Legal Officer and other executive and senior Leaders.</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 / Work Instructions • Data Quality Procedures 	Yes	<p>illion uses sophisticated, automated rank and match techniques to match information within illion's systems. In addition, illion has implemented additional improvements to cater for demographic shifts including machine learning to assist identify matching issues that may not be readily identifiable using traditional matching algorithms.</p> <p>The combination of techniques balance the need to provide accurate matches with complete and accurate information.</p> <p>The Public Access Centre Procedures / Work Instructions provides detailed instructions for handling manual matching of records.</p> <p>The Data Quality Team uses the monthly reporting and sample data to regularly check if there may have been any incorrect matching of information. Reports are also provided to Credit Providers to improve data quality at source.</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 (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 / Work Instructions • Data Quality Procedures 	Yes	<p>illion uses sophisticated rank and match techniques to match information.</p> <p>The Public Access Centre Procedures / Work Instructions provides detailed instructions for handling manual matching of records.</p> <p>The Data Quality Team uses the monthly reporting and sample data to regularly check if there may have been any incorrect matching of information. Reports are also provided to Credit Providers to improve data quality at source.</p> <p>Systems also provide alerts where potential matching issues arise.</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"> • 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. This includes specific retention rules for New Zealand. Separate daily processes operate for New Zealand, with error checking to alert if any step fails.</p> <p>illion's data quality processes track 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.		

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
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 / Work Instructions 	Yes	<p>illion has this year automated suppressions (initiation, extension and release) requests via its website. This is partly in response to increased volumes caused primarily by non-illion, publicised large scale breaches. This has improved response times and illion's ability to handle the increased volumes.</p> <p>The Public Access Centre also has detailed work instructions for dealing with manual suppression requests.</p> <p>Suppression requests are reported on daily basis.</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 this year augmented the dedicated complaints role introduced in the last reporting period. In addition, illion has provided training to a backup pool of staff to assist when volumes are high to ensure complaint response timeframes remain within specified service levels.</p> <p>As part of its continuous improvement illion is planning to launch a digitised complaint management system 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	<p>illion's website displays accurate information.</p> <p>In addition, the website underwent improvements this year to introduce automatic actioning of suppressions.</p>

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 to ensure the correct data elements are shared. The Client Integration Team ensures all agreements are setup correctly.</p> <p>As part of its Data Quality process illion considers a subscriber's usage matches their declared use case and product profile. Along with tracking complaints and correction requests illion monitors and reports both daily and 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	illion's core systems prevent the recording of small default amounts less than the amount permissible in the Code.

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	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.
4 (b)	Did illion, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Yes	No material deficiencies were identified in the previous year's report that required remedial action during this reporting period. It is noted that illion operates in a manner of continuous improvement, to highlight and implement improvements to its policies, procedures and controls. Several improvements were made through the reporting period with illion's future focus being to further automating functions through the whole customer engagement life-cycle to improve response times and customer experience.

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 previously undertaken the illion assurance report for the reporting period, year ending 30th June 2022.