



**CENTRIX GROUP LIMITED**

**ASSURANCE REPORT TO  
THE PRIVACY COMMISSIONER**

**FOR THE PERIOD  
1 APRIL 2012 TO 30 JUNE 2012**

**In accordance with Clause 9 and Schedule 6 of the  
Credit Reporting Privacy Code 2004**

## **I Purpose**

Centrix Group Limited (“Centrix”) is a credit reporter for the purposes of the Credit Reporting Privacy Code 2004 (“Code”). This report is provided to the Privacy Commissioner as required by Clause 9 of the Code. This Assurance Report has been prepared by a review committee established by Centrix for the purpose of preparing this report for the period 1 April 2012 to 30 June 2012 (“Review Committee”).

This Assurance Report has been reviewed by the Centrix’ Board of Directors.

## **II Review Committee**

The members of the Review Committee were:

Keith McLaughlin (Managing Director, Centrix Group Ltd)

Mark Rowley (Executive Director, Centrix Group Ltd)

Katherine Gibson (Legal, Centrix Group Ltd)

Janine Jackson (independent person)

Janine Jackson has expertise in relation to matters of compliance with this Code, as described in Schedule 1. Mrs Jackson is not an employee, director, or owner of Centrix.

### **III Summary of review process and method followed by Committee**

A summary of the systematic review process and methods followed by the Review Committee in preparing this report is provided below:

#### *(a) Credit Reporting Privacy Code Compliance Committee*

Centrix has a Credit Reporting Code Compliance Committee (“Compliance Committee”). This is a permanent Committee established by Centrix to oversee Centrix’ compliance with the Code. In carrying out this role, the Committee undertakes the following relevant tasks:

- Reviews company policies and procedures to ensure Centrix has in place the policies and procedures required by the Code;
- Reviews Centrix’ monitoring systems in place for Code compliance;
- Reviews any Code complaints received by Centrix and the Code issues log and considers whether appropriate action has been taken and whether any changes to Centrix’ policies or procedures are required.
- Reviews the Code Compliance Report (as well as supporting documentation) prepared by management on a regular basis, and considers whether appropriate action has been taken where deficiencies have been identified, and whether any changes to Centrix’ policies or procedures are required (See (b)) below for more details on the Code Compliance Report).

The minutes of the Compliance Committee meetings are reviewed by the Centrix Board of Directors on a regular basis.

During the period under review, the Compliance Committee met each month.

The Review Committee reviewed all the Compliance Committee meeting documents and minutes for the period under review.

#### *(b) Code Compliance Report*

A Code Compliance Report is prepared by Centrix management on a regular basis. This is a report on the regular monitoring activities undertaken by Centrix in relation to Code policies, procedures and controls and subscriber agreements, as well as the actions taken where any deficiencies are identified. This report is presented to the Compliance Committee for review.

The Code Compliance Report is also provided to the Centrix Board of Directors for review.

During the period under review, a Code Compliance Report was prepared each month and presented to the Compliance Committee for consideration. All supporting documentation evidencing the monitoring activities undertaken was also provided to the Compliance Committee for its review.

The Review Committee reviewed all the Code Compliance Reports prepared during the period under review as well as all supporting documentation.

*(c) Code compliance policies*

The Review Committee reviewed the policies Centrix has in place as required by the Code.

Mrs Jackson also independently reviewed the policies.

*(d) Internal procedures and controls*

The Review Committee reviewed and discussed the internal procedures and controls in place to ensure compliance with the policies Centrix has in place as required by the Code. This included Mrs Jackson working through each Code policy and considering the internal procedures and controls required, which involved asking questions of Centrix management and also reviewing relevant documentation.

*(e) Information and training to the staff*

The Review Committee reviewed the Code information, policies and training that has been provided to the relevant Centrix staff, as well as the staff acknowledgement forms.

*(f) Subscriber agreements*

The Review Committee reviewed the pro-forma subscriber agreements used by Centrix during the period under review to ensure compliance with Schedule 3 of the Code.

In addition, Mrs Jackson randomly selected a number of subscriber agreements entered into during the review period and reviewed them for the purposes of compliance with Schedule 3. In relation to subscriber agreements entered into before 1 April 2012, Mrs Jackson reviewed the notices sent to subscribers advising of amendments to the subscriber agreements from 1 April 2012 to take into account the relevant Code amendments.

Ensuring subscriber agreements are in place before disclosing credit information is part of the regular monitoring activities undertaken by Centrix and is included in the Code Compliance Report.

*(g) When deficiencies identified during systematic reviews*

The Review Committee reviewed the actions taken by Centrix where deficiencies were identified during the systematic reviews that had been undertaken by Centrix during the review period, through its review of the Compliance Reports and the Compliance Committee meeting minutes.

#### IV Reasonable Assurances

(a) *Reasonable assurances provided*

Having completed the review, the following reasonable assurances are provided:

	<b><i>Schedule 6 Assurances</i></b>
<b><i>cl 2</i></b>	<b><i>Assurances relating to policies, procedures, controls and subscriber agreements</i></b>
	A reasonable assurance is provided that during 1 April 2012 to 30 June 2012, Centrix:
(a)	had policies in place that give effect to the requirements of the Code.
(b)	had internal procedures and controls in place to give effect to the policies and requirements of the Code.
(c)	provided information and training to its staff to ensure compliance with the policies, procedures and controls.
(d)	ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information.
<b><i>cl 3</i></b>	<b><i>Assurances relating to monitoring of policies, procedures, controls and subscriber agreements</i></b>
	A reasonable assurance is provided that during 1 April 2012 to 30 June 2012 Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that
(a)	Centrix followed its own policies, procedures and controls.
(b)	the information held by Centrix was protected by reasonable security safeguards.
(c)	Centrix processed information privacy requests in accordance with rules 6 and 7.
(d)	Centrix took such measures as were reasonably practicable to avoid the incorrect matching of information held by Centrix.
(e)	the information held by Centrix was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading.
(f)	Centrix' reporting of credit information was in accordance with rule 9 and Schedule 1.
(g)	Centrix processed directing marketing lists in accordance with rule 10(1C).
(h)	Centrix processed suppression, release or cancellation requests in accordance with Schedule 7.
(i)	Centrix processed complaints in accordance with Clause 8.
(j)	Centrix' website displayed accurate information that gave effect to rules 6(4)(b), 7(4)(b) and clause 8(3A) and clause 8.1 of Schedule 7.
(k)	subscribers complied with agreements and controls.
<b><i>cl 4</i></b>	<b><i>Assurances relating to action taken on deficiencies identified</i></b>
	A reasonable assurance is provided that during 1 April 2012 to 30 June 2012:
(a)	where during Centrix systematic reviews, monitoring activities or as a result of a complaint, Centrix identified a breach of an agreement, policy, procedure, control or requirement of the Code, Centrix investigated that breach, and where appropriate, took prompt remedial action.

<i>cl 6.1</i>	<i>Schedule 8 Assurances</i>
	A reasonable assurance is provided that during 1 April 2012 to 30 June 2012 Centrix undertook monitoring activities to ensure that:
(a)	any systems testing undertaken by Centrix in reliance upon clause 3.2 met the requirements of clause 3.3.
(b)	where clause 4.1 applies, the credit reporter complied with clause 4.2.
(c)	Centrix: <ul style="list-style-type: none"> <li>(i) ceased collecting small defaults from 1 April 2012;</li> <li>(ii) subject to clause 5.4, ceased reporting small defaults from 1 April 2012; and</li> <li>(iii) when continuing to report small defaults relating to an overdue payment equal to or more than \$50 in reliance upon clause 5.4, met the requirements of clauses 5.4 and 5.5.</li> </ul>

*(b) Reasonable assurance not provided*

For the period 1 April 2012 to 30 June 2012, a reasonable assurance cannot be given that Centrix' retention of credit information was in accordance with rule 9 and Schedule 1 of the Code. During this period, Centrix manually deleted credit information that was beyond its maximum retention period, and whilst this manual process was undertaken regularly during this period, it was not on a daily basis and therefore, at times, Centrix held information beyond its maximum reporting period. As provided above, however, a reasonable assurance can be given that during this period Centrix did not report this information beyond its maximum reporting period.

In July 2012, Centrix completed implementation of an IT program that deletes credit information when it reaches the maximum retention period. This program runs nightly. From July 2012, a reasonable assurance can be given that Centrix' retention of credit information is in accordance with rule 9 and Schedule 1 of the Code.

Dated 11 September 2012



Keith McLaughlin  
Managing Director and  
Chairman Review Committee



Janine Jackson



Mark Rowley  
Executive Director



Katherine Gibson  
Legal

### Schedule 1

Mrs Jackson was employed by Baycorp (now known as Veda) for a period of over 16 years, with most of that time being involved in some way in the operations of the New Zealand credit bureau. Mrs Jackson held a number of roles at Baycorp, including Privacy Officer and Operations Manager of the credit bureau. Whilst this experience was prior to the introduction of the Credit Reporting Privacy Code 2004 ("Code"), the credit bureau was required to comply with the Privacy Act 1993, which required Mrs Jackson to understand and ensure the bureau complied with the Information Privacy Principles. During this period, Mrs Jackson established the first Privacy Department in the Baycorp credit bureau operations, which increased consumer awareness and minimised complaints through implementing policies and processes. Mrs Jackson was also responsible for managing and resolving consumer complaints regarding privacy issues and liaising with the Office of the Privacy Commissioner regarding complaints.

During 2004 – 2005, Mrs Jackson was responsible for project managing all business related activities of the project undertaken by Baycorp to ensure it was ready for compliance with the introduction of the Code. Mrs Jackson was Baycorp's 'trusted advisor' who was instrumental in liaising and advising directly with the credit bureau subscribers to ensure the bureau and the subscribers had implemented the necessary processes and procedures to meet the requirements of the Code. This included (but was not limited to) a review and implementation of a consumer complaints procedure, carrying out a national 'roadshow' advising all subscribers of the Code requirements and a review of personal information data matching rules.

In addition to Mrs Jackson's previous experience in the operations of a New Zealand credit bureau and complying with the Privacy Act, including the Code, Mrs Jackson has significant experience in IT audit, risk and compliance in other industries. Mrs Jackson is currently employed by Vero New Zealand Ltd as an Executive Manager – I T Solution Delivery, Customer Support. Part of her responsibilities include being accountable for New Zealand IT audit, risk and compliance, including IT security and IT policies for all New Zealand Suncorp Group entities. This includes participation in the annual audit review completed by KPMG and the Australian Prudential Regulation Authority, to provide evidence and assurances that the Group IT security and policies are in place, effective and being followed.

Mrs Jackson not only has experience in Code compliance, but also has significant experience in undertaking audits in the insurance industry according to the applicable New Zealand and Australian regulations.