

Clause Reference	Response
<p>1. Process of Review and Reporting</p>	<p>The systematic review process and the methodology followed was to prepare the assurance report as a Project, so engaging all relevant stakeholders required to produce the report.</p> <p>Veda elected to prepare the report by a review committee under clause 9(2)(b). The members of Veda's review committee are:</p> <ul style="list-style-type: none"> • John Roberts, Managing Director, New Zealand and International; • Daniel De Vries, General Manager, Product and Bureau Operations; • Michelle Chignell , NZ Legal Counsel; • Chris Woodhead, IT Manager NZ; • Emily Upton, Product Manager B2C Services; • Hana Fuimaono, Customer Services Operations Manager; • Lisa Davies, Project Manager; • Sarah-Jane Weir, Consultant to Anderson Lloyd Lawyers; and • Olga Ganopolsky, General Counsel. <p>The independent person is Sarah-Jane Weir, Consultant to Anderson Lloyd Lawyers, who has advised Veda regarding various legal matters in relation to the Code since its inception¹. This included advice given for the initial project whereby Veda assessed how to comply with the Code on its introduction. She has extensive relevant experience in privacy. Neither Sarah-Jane Weir nor Anderson Lloyd is an employee, director or owner of Veda Advantage.</p> <p>The review committee both participated in and reviewed the participation of other relevant participants to arrive at the assurance report.</p>

¹ Neither Anderson Lloyd nor Sarah-Jane Weir accepts any liability for this report. In particular they note they are reliant on the information made available to them by Veda Advantage New Zealand Limited and that such information was complete and accurate.

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<p>2. Assurances Relating to the Policies, Procedures, Controls and Subscriber Agreements</p> <p>Veda provides reasonable assurance in terms of Schedule 6 clause 2 that in relation to the period from 1 July 2012 to 30 June 2013 Veda had formal and informal policies in place to give effect to the requirements of the Code. In particular:</p>	<p>(a) <i>Veda had policies in place that give effect to the requirements of the code. Veda has Policies for Use documentation. Veda has a series of formal and informal processes which it believes cover the requirements of the Code pre-CCR and post CCR data collection and disclosure. These include its Policies for Use which subscribers are contractually obliged to comply with. Once CCR data collection and disclosure is fully implemented with full data sharing those policies may be further updated.</i></p> <p>(b) <i>Veda had internal procedures and controls in place to give effect to the policies and requirements of the code; Veda has internal policies, procedures and controls to give effect to the Code including automated access detection. Veda has reviewed its processes, procedures and controls. Veda intends to further review these over time.</i></p> <p>(c) <i>Veda provided information and training to its staff to ensure compliance with the policies, procedures and controls; Veda provides training to all staff on compliance matters. Training includes the access to data which may be made by staff. Training is provided on the basis of function.</i></p> <p>(d) <i>Veda ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information. Veda's processes are designed to ensure that no disclosure of credit information is made except to a subscriber with a subscriber agreement in place (or as otherwise permitted by law). In addition the new terms for CCR data must be agreed to before there is any CCR data participation.</i></p>
<p>3. Monitoring of Policies, Procedures, Controls and Subscriber Agreements</p> <p>In accordance with clause 3 of Schedule 6, this Report provides a reasonable assurance that:</p>	<p>(a) <i>The credit reporter believes it followed its own policies, procedures and controls. Veda has been reviewing its internal compliance and continues to do so in order to improve where possible. Given the low level of complaints to either Veda or to the OPC and from the internal and external reviews undertaken to date, and from the automatic and system controls around access of data held regarding credit reporting, Veda holds this belief reasonably.</i></p> <p>(b) <i>The information held by Veda was protected by reasonable security safeguards. Veda has robust security policies including system access controls which are applied group wide. We also have firewalls, secure housing of the database with disaster relief back up provisions; restricted accesses and</i></p>

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	<p>controlled and monitored log-ins. Internal and external access safe guards are in place. Therefore Veda understands it holds this belief reasonably.</p> <p>(c) <i>The credit reporter processed information privacy requests in accordance with Rule 6 and 7 of the Code.</i> Veda monitors requests for credit information and holds the belief that such requests are processed in a way that meets the requirement of rules 6 and 7 of the Code. Veda notes that the outcome of [REDACTED] may influence its view of compliance.</p> <p>(d) <i>Veda took such measures that were reasonably practicable to avoid the incorrect matching of information.</i> Veda has complex automated routines to underpin how its data matching is undertaken. As the OPC is aware, these are automatic system processes, not manual. As these processes are automatic they are difficult to audit outside the IT environment. However from the low level of complaints around data matching, Veda believes that it complies with this obligation. The IT processes are clearly documented. Complex algorithms underpin the processes. The key data fields to match on are name, address and date of birth. Driver licence data is not available on every file to match, however Veda believes over time use of driver licence data will further improve matching accuracy as this information builds on the database.</p> <p>(e) <i>The information held by Veda was subject to reasonable checks to ensure it was accurate, up to date, complete, relevant and not misleading.</i> Veda reasonably believes that the information is up to date, and that it is complete, relevant (more a function of system design) and not misleading. This is based upon the level of complaints from individuals around data; assessments made in investigations of such complaints and on the assurances Veda seeks from its subscribers both through their contractual obligations and through the monitoring it does undertake (see below) to ensure data accuracy.</p> <p>(f) <i>Veda's reporting and retention of credit information was in accordance with Rule 9 and Schedule 1 of the Code.</i> Veda has automated processes regarding reporting of information and how long data is retained for; accordingly it reasonably believes that it meets these requirements. The relevant data fields listed in Schedule 1 of the Code are assigned an automated removal date and the system is designed for those fields to be removed in accordance with that date.</p>

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(g) *Veda processed direct marketing lists in accordance with Rule 10(1)(C). Special contractual terms apply to the processing of direct marketing lists which aim to ensure that the subscriber meets their obligations in this regard. Veda has policies that state access cannot take place without the subscriber agreeing to these terms. The current policies require sign off from senior staff members who are trained in privacy compliance before any such access is made available. Veda notes that such services are available to a very limited range of subscribers.*

(h) *Veda processed suppression, release, or cancellation requests in accordance with Schedule 7. Veda notes that there have continued to be very low levels of such requests during the period covered by this report. Veda is satisfied as to its level of compliance.*

	Reply Required	Suppression Cancelled	Suppression Extension Loaded	Suppression Extension Required	Suppression Release Loaded	Grand Total
Total (for 12 months)	3	23	11	1	1	39

(i) *Veda processed complaints in accordance with Clause 8 of the Code. Veda is satisfied that complaints are dealt with in accordance with Clause 8. The personnel involved in dealing with complaints have processes to follow which comply with the Code. Those processes include diary follow ups to ensure that key dates are met. Internal reporting on a monthly basis is designed to ensure that appropriate personnel in the organisation can check on such complaints and offers a reactive check on such processes. Monthly complaints outcomes are monitored and Veda looks for anomalies or trends which can then be addressed. Veda believes this is an appropriate level of compliance for the size and nature of most complaints.*

(j) *Veda's website disclosed accurate information that gave effect to Rules 6(4)(b), 7(4)(b), 8(3)(A) and 8.1 of Schedule 7. Veda believes it complies with this obligation.*

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	<p>(k) <i>Subscribers complied with agreements and controls. To the best of Veda's knowledge this is the case. Veda notes that (as it has made the OPC aware) there are inherent difficulties and conflicts in requiring an organisation to police its major customers. All subscribers are required to have a subscriber agreement which contractually obliges those customers to comply with the relevant obligations of the Code. If it is identified either by monitoring or by complaint investigation that a subscriber is not complying, Veda takes appropriate remedial action to deal with such subscriber. Veda believes this is appropriate.</i></p>
<p>4. Assurances Relating to Action Taken on Deficiencies Identified</p>	<p>(a) <i>During Veda's systematic reviews, monitoring activities or as a result of a complaint, where Veda identified a breach of an agreement, policy, procedure, control or requirement of the Code, Veda investigated that breach and where appropriate took prompt remedial action Veda notes from the above that it takes remedial action where appropriate. Veda reviews investigations and complaints regularly and systematically looks for and addresses any systemic issues.</i></p> <p>(b) <i>No deficiencies have been identified in the previous year's report.</i></p>
<p>5. Schedule & Transitional Provisions</p> <p>Clause 6 of Schedule 8: Veda provides a reasonable assurance that:</p>	<p>Clause 4.1 - Veda has incorporated the requirement in its CCR terms. The data standards agreed upon at RCANZ² mean that the date when notice was given by a subscriber to their customers can be reported to Veda. Veda intends to capture the date of the clause 4.2(b) notice. Requiring a date to be supplied is a measure to address clauses 4.1 and 4.2 in a way which will be transparent and compulsory.</p>

This Report is dated the *27th* day of *September* 2013

² The Retail Credit Association of New Zealand Inc. (RCANZ) is a specialist industry association set up to create a forum for providers of credit to individuals (major bank, non-bank and utility service organisations); the major credit reporters; and organisations able to access positive credit data under the Credit Reporting Privacy Code 2004. A sub group of RCANZ has formulated the data standards which members of RCANZ agreed would enable CCR data sharing. The data standards work like a data dictionary enabling consistent CCR data collection and sharing.