

Dun & Bradstreet (New Zealand) Limited

***Assurance Report under Clause 9
of the Credit Reporting Privacy Code
for the year ending 30 June 2014***

Dated 30 September 2014



Decide with Confidence

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Preface

- (a) Clause 9 of the Credit Reporting Privacy Code 2004 (the Code) requires credit reporters to prepare and submit to the Office of the Privacy Commissioner each year an Assurance Report (the Report) that reflects the requirements of Schedule 6 of the Code.
- (b) This is the third year that Dun & Bradstreet (New Zealand) Limited (D&B) has provided a Report. A link to last year's (2013's) Report is [here](#).
- (c) What follows is D&B's Report for the year ended 30 June 2014 for submission on or before Tuesday 30 September 2014.
- (d) This Report is an exceptions Report, in that it lists and comments on changes from and developments since last year's Report. For ease of reference, this Report uses the same structure as last year's.

Introduction

- 1.6 Replacement clause 1.6: What follows is D&B's Assurance Report for the year ended 30 June 2014 for submission on or before Tuesday 30 September 2014.
- 2.1 Replacement clause 2.1: The Review Committee: members and affiliations

<p>Dennis Martin Managing Director D&B employee and director based in Auckland</p>	<p>Stacey Corrigan Team Leader, Debt Management Solutions D&B employee based in Auckland</p>
<p>Maria King Operations Manager Trans-Tasman D&B employee based in Auckland</p>	<p>David King National Operations Manager, Debt Management Solutions D&B employee based in Auckland</p>
<p>Margaret Naicker Public Access Centre – Responsible for day to day duties for Consumer Risk Solutions D&B employee based in Auckland</p>	<p>Yvonne Muller (independent person) Barrister and Solicitor in sole practice (also Editor and Content Manager, College of Law New Zealand) Based in Auckland</p>
<p>Guy Sellers Senior Business Development Manager D&B employee based in Auckland</p>	

- 2.2 Additional Information about the independent person's expertise and independence: see **Appendix 1**.

1. Summary of Assurances

Schedule 6 clause 2: Assurances relating to policies, procedures, controls & subscriber agreements	
(a) Does D&B have policies in place that give effect to the requirements of the Code?	Yes
(b) Do D&B's internal procedures & controls give effect to the policies & requirements of the Code?	Yes
(c) Does D&B provide information and training to staff to ensure compliance with the policies, procedures and controls?	Yes
(d) Do D&B's subscriber agreements comply with Schedule 3 and are they in place before disclosing credit information	Yes
(e) Does D&B follow its own policies, procedures & controls?	Yes
Schedule 6 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements	
(a) Does D&B follow its own policies, procedures & controls?	Yes
(b) Is the information held by D&B protected by reasonable security safeguards?	Yes
(c) Does D&B process information privacy requests in accordance with rules 6 and 7?	Yes
(d) Does D&B take such measures as are reasonably practicable to avoid incorrect matching of information?	Yes
(e) Is the information held by D&B subject to reasonable checks to ensure that it is accurate, up to date, complete and not misleading?	Yes
(f) Is D&B's reporting and retention of credit information in accordance with rule 9 and schedule 1?	Yes
(g) Does D&B process direct marketing lists in accordance with rule 10(1C)?	Not applicable
(h) Does D&B process suppression, release or cancellation requests in accordance with Schedule 7?	Yes
(i) Does D&B process complaints in accordance with clause 8?	Yes
(j) Is D&B's website displaying accurate information that gave effect to rules 6(4)(b), 7(4)(b), clause 8(3A) and clause 8. 1 of Schedule 7?	Yes
(k) Are D&B's subscribers complying with agreements and controls?	As far as D&B can ascertain, yes
Schedule 6 clause 4: Assurances relating to action taken on deficiencies identified	
(a) Did D&B, where, during its systematic reviews, monitoring activities or as a result of a complaint, <ul style="list-style-type: none"> • identify any breaches of an agreement, policy, procedure, control, or requirement of the code, • investigate that breach and, where appropriate, take prompt remedial action? 	Yes
(b) Did D&B, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Not applicable. None identified
(c) Can D&B provide an assurance it has complied with clause 6.1(b) of Schedule 8?	Yes

2. Schedule 6 clause 2: Assurances relating to policies, procedures, controls & subscriber agreements

Requirement	Owner	Details	Assurance and Assessment
a		Does D&B have policies in place that give effect to the requirements of the Code?	Same disclosure as last year
b		Do D&B's internal procedures & controls give effect to the policies & requirements of the Code?	Same disclosure as last year
c		Does D&B provide information and training to staff to ensure compliance with the policies, procedures and controls?	Same disclosure as last year
d		Do D&B's subscriber agreements comply with Schedule 3 and are they in place before disclosing credit information?	Same disclosure as last year, and in addition: D&B has continued to develop and refine its documentation in order to clarify the rights and responsibilities of the parties in these agreements, and in particular where entities seek access to D&B's Comprehensive Consumer Credit Information only . The new documentation complies with Schedule 3.

3. Schedule 6 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements

a	Does D&B follow its own policies, procedures & controls?	Same disclosure as last year, and in addition: The 2014 ISO surveillance report was conducted on 21 May 2014, with the same objectives as the 2013 surveillance report. The auditor confirmed in the May 2014 surveillance report that D&B continued to meet ISO 9001:2008 standards and that its registration should continue. One area of particular relevance to this (Privacy Assurance) Report is the review of the Customer Complaint Handling System (which includes, but extends further than, D&B's Credit Reporting function). The auditor noted that complaints are significantly few compared with the number of transactions, that they cover a range of issues, and that not all represented a valid complaint. Actions and follow-up were found to be satisfactory. No issues were identified in relation to the application for personal credit reports. Again, this audit is independent evidence that the processes relating to the identified elements and controls meet the relevant statutory and regulatory requirements.
b	Is the information held by D&B protected by reasonable security safeguards?	Same disclosure as last year
c	Does D&B process information privacy requests in accordance with rules 6 (Access to Credit Information) and 7 Correction of Credit Information?	Same disclosure as last year.

Requirement	Owner	Details	Assurance and Assessment
d, e			<p>Does D&B take such measures as are reasonably practicable to avoid incorrect matching of information, and is the information held by D&B subject to reasonable checks to ensure that it is accurate, up to date, complete and not misleading?</p> <p>Same disclosure as last year</p>
f			<p>Is D&B's reporting and retention of credit information in accordance with rule 9 (Retention of Credit Information) and Schedule 1 (Maximum Reporting Periods)?</p> <p>Same disclosure as last year</p>
g			<p>Does D&B process direct marketing lists in accordance with rule 10(1C)?</p> <p>Not applicable/same disclosure as last year</p>
h			<p>Does D&B process suppression, release or cancellation requests in accordance with Schedule 7 (Suppression of Credit Information)?</p> <p>Same disclosure as last year</p>
i	NZ/PAC	Complaints Handling Procedure PAC Matrix	<p>Yes. Para 1 – Same disclosure as last year</p> <p>Para 2 – New comment for 2014: D&B received seven complaints about credit reports last year (two others related to credit reports produced by other credit bureaus, not D&B, and do not form part of this analysis). Six of the seven were resolved within the period of this Report through a variety of mechanisms including amending the credit report.</p>
j			<p>Is D&B's website displaying accurate information that gave effect to rules 6(4)(b), 7(4)(b), clause 8(3A) and clause 8. 1 of Schedule 7?</p> <p>Same disclosure as last year</p>
k			<p>Are D&B's subscribers complying with agreements and controls?</p> <p>During the Report period, D&B reviewed the consent and control mechanisms of Customers, in the Telco, Energy, Finance, and Corporate sectors. To the best of D&B's knowledge and based on D&B's review of Customer documentation, all were compliant with agreements and controls.</p>

4. Schedule 6 clause 4: Assurances relating to action taken on deficiencies identified

Requirement	Owner	Details	Assessment	
a	Did D&B, where, during its systematic reviews, monitoring activities or as a result of a complaint, identify any breaches of an agreement, policy, procedure, control, or requirement of the code, investigate that breach and where appropriate, take prompt remedial action?	NZ/PAC	D&B Complaints Handling	<p>New comment for 2014:</p> <p>Yes. The D&B Complaints Handling Council reviews and analyses all complaints regularly to identify and rectify any systemic and recurring problems.</p> <p>The handling of one of the complaints referred to above at clause 3(i) revealed a tracking issue in D&B's complaints handling process. Complaints are channelled through a formal complaints portal, which allows their logging in the Complaints Handling Register. In this case the complaint correspondence was not handled in the usual manner because of the way the complaint was initially raised and was not added to the Register, which has strict timelines and action points to ensure both regulatory and internal compliance with managing complaints. To ensure this does not happen again, D&B has updated its privacy and complaints procedure to clarify who must be notified when complaints are made, irrespective of their initial presentation. The updated policy clarifies the lines of responsibility and ensures that more complex complaints are noted in D&B's Privacy and Complaint Incident Register, which is a better platform for incidents that require more than 30 days to resolve and which will ensure that difficult complaints are escalated sooner and to an appropriate level for resolution.</p>
b	Did D&B, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action? No deficiencies were identified in the 2013 Report.			
Clause 6.1(b) of Schedule 8	Note: During the transition to more comprehensive credit reporting, the assurance report must also include the information set out in clause 6. 1 (b) of Schedule 8.		<p>New comment for 2014:</p> <p>Uptake by credit providers of the provision allowing reporting of comprehensive (positive) credit information was initially slow, but has grown steadily over the last 12 months. D&B continues to follow an automated checking process to confirm that its credit provider subscribers have complied and notified their customers of the uploading of comprehensive credit information.</p> <p>An individual who requests his/her credit report now sees both the positive and negative data on his/her report. The positive data goes back to the date that a credit provider first loaded its positive data with D&B. Anecdotally, one provider has reported a 30% reduction in the number of individuals that it is rejecting now, compared to before it was making use of Comprehensive Credit Reporting. D&B understands that this has been achieved without an increase in the provider's levels of bad debt.</p>	

5. Appendices

Appendix 1

Paragraph 2.2: Additional Information about the independent person's expertise and independence

Ms Muller has never trained staff in nor been engaged to assist at any stage with implementing privacy policies or compliance programmes. She has not been involved in drafting or developing privacy policies for the last five years. Compliance implementation and training is managed by D&B's local compliance team led by its Privacy Officer. For privacy matters, Yvonne does not report locally. Instead she reports to Mary O'Leary, Senior Legal Counsel in Dun & Bradstreet (Australia) Pty Ltd, who is responsible for compliance in Australia and New Zealand and who in turn reports directly to Dun & Bradstreet Corporation, USA. A negative audit review by Yvonne or a discovery by her of shortfalls or inadequacies relating to privacy and in particular for the requirements of this Report would not impact on the terms of Yvonne's engagement by D&B as its independent person.

Appendix 2

Summary of documents reviewed (alphabetical)

Call Centre Privacy Procedure (verification of identity and authority)
Client Training: Consumer Credit Bureau Fact Sheets
Complaints Handling Procedure (internal document) May 2014
Complaints Register July 2013 – June 2014
Confidentiality and Non-Disclosure Policy – June 2014
Consumer Credit File – update form (this form is filled in by consumers if they query or want an investigation into the content of their credit file) – May 2014
Document Destruction Service outline of services and location/action taken confirmation sheet
Employee Training (various documents)
Employment agreement template
ISO 9001 2008 Certificate QEC7030 dated 2 April 2014
ISO Executive Summary by SAI Global dated 21 May 2014
Master Agreement – NZ Credit Services Module – March 2014
Network User Log On agreement / acknowledgement
New Zealand Public Access Centre (PAC) Procedures Matrix (book) v 4.5 February 2014
Policy – Use of Electronic Resources March 2014
Acknowledgement form by employee of receipt of and having read and understood the Use of Electronic Resources Policy February 2014
Privacy Act Code of Conduct April 2014

Website information www.dnb.co.nz

- Complaints Handling + “Complaint lodgment [sic] Form” (also available to complete as an online form)
- “Privacy Policy”, covering:
 - Legal entities
 - What you need to know about our data protection practices
 - Collection of information
 - Website data collection practices
 - Use and disclosure
 - Information quality
 - Information security and retention
 - Access and correction
 - Summary of Rights*

- D&B D-U-N-S Number registration
- Updates to D&B data protection practices for the internet
- Financial transactions
- Additional information

* available as separate download in 12 languages