



CENTRIX GROUP LIMITED

**ASSURANCE REPORT TO
THE PRIVACY COMMISSIONER**

**FOR THE PERIOD
1 JULY 2014 TO 30 JUNE 2015**

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

1 Purpose of Assurance Report

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 July 2014 to 30 June 2015 ("Review Committee"). This Assurance Report contains information that Centrix considers should not be made public and this is indicated by brackets [] and this information is provided separately in Schedule 3. We respectfully request that the information in Schedule 3 not be made public. We ask that the Office of the Privacy Commissioner withhold disclosure of the information contained in Schedule 3 where any Official Information Act 1982 request is made (under sections 6(c), 9(b) and/or 9(k) of that Act). We ask that if the Office considers that any of this information should be made public that Centrix is given a reasonable opportunity to present the reasons in support of withholding the information, before the information is made public.

2 Review Committee

2.1 Members of the Review Committee

Keith McLaughlin (Chairman), Managing Director, Centrix Group Ltd
Mark Rowley, Executive Director, Operations Manager, Centrix Group Ltd
Katherine Gibson, Legal Counsel, Centrix Group Ltd
Janine Jackson, independent person

2.2 Independent Person

Information about Mrs Janine Jackson's relevant experience and expertise is set out in Schedule 1, including her expertise in relation to matters of compliance with the Code.

Mrs Jackson is not (and never has been) an employee, director, or owner of Centrix.

Mrs Jackson does not only meet the "independent person" definition in the Code, she is also independent of the matters that are required to be reviewed in this process. Mrs Jackson has never been involved in the establishment, implementation or monitoring of Centrix' Code compliance programme, nor has she ever advised or provided services to Centrix on any matter relating to Code compliance (except as an independent person on the Review Committee).

Other than being the independent person on the Review Committee for Centrix' Assurance Reports for 2012, 2013, 2014 and for this Assurance Report, Mrs Jackson does not provide (and never has provided) any services to Centrix.

3 Summary of review process and method followed by Committee

3.1 *Role of the Credit Reporting Privacy Code Compliance Committee*

In order to provide a summary of the review process and method followed by the Committee, the role of Centrix Credit Reporting Code Compliance Committee ("Compliance Committee") needs to be explained.

The Compliance Committee is a permanent Committee established by Centrix to oversee Centrix' compliance with the Code. In carrying out this role, the Committee undertakes a number of Code compliance tasks. Some of these tasks include:

- a) Sets all policies, procedures and forms that are required by the Code.
- b) Sets the scheduled Code monitoring activities to be undertaken (for example, type of monitoring, frequency and number of subscribers/enquiries).
- c) Reviews the policies and procedures formally at least annually and also where an event occurs that requires a review (for example a change to the Code or an operational issue has arisen).
- d) Every quarter reviews all the results of the scheduled Code compliance monitoring undertaken and any action taken as a result of the monitoring and decides whether the action taken is appropriate in terms of Code compliance.
- e) Every quarter reviews the Code Compliance Report (see below for more details on the Code Compliance Report).
- f) Every quarter reviews any Code complaints received.
- g) Every quarter reviews a summary of the Corrections Register for the preceding quarter.
- h) If appropriate as a result of the reviews undertaken in d) to g) above, sets any additional action to be taken in relation to that matter and/or an amendment to the relevant policy or procedure and follows up to ensure completed.
- i) Sets the staff training programme and monitors this.
- j) Sets the general Code compliance schedule (for example, general compliance communications to subscribers).
- k) Considers the staff access privileges to the consumer Bureau.

This Committee meets at the end of every quarter to review Code compliance matters for the quarter. [1]

3.2 *Code Compliance Report*

A Code Compliance Report was prepared at the end of every quarter for the period under review. Each report included the following in relation to the relevant quarter:

- a) The scheduled monitoring undertaken and the outcome of the monitoring;
- b) Details of any Code complaints received;
- c) Details of any incorrect matching;
- d) Details of any actions taken in relation to Code matters.

3.3 Compliance Committee meetings

For the period under review the Compliance Committee met 4 times. [2]

The Compliance Committee received a Compliance Report for every quarter (along with all supporting documentation evidencing the monitoring) and any other relevant papers that had been prepared. The report was considered and discussed at a meeting of the Committee. Minutes of every Compliance Committee meeting were taken.

All Compliance Committee agendas, meeting minutes, Compliance Reports and all papers presented to the Committee for the relevant period were reviewed as part of the process for the Assurance Report.

3.4 *Process and framework for the Assurance Report*

A process and framework was prepared that noted each assurance sought and in relation to each assurance detailed:

- a) The reviews to be undertaken;
- b) The personnel involved in the reviews;
- c) The reviews that would be undertaken by Mrs Jackson independently from the other Committee members;
- d) All the documentation to be reviewed.

This was a fluid document. As the reviews proceeded, additional information was sought and at times this led to other matters needing to be reviewed. The Review Committee considered it was important that during the process the scope of the reviews and the information to be considered could be widened so that all relevant matters were reviewed in the preparation of this report.

A summary of what was reviewed is set out Schedule 2. Mrs Jackson independently reviewed all this information.

Mrs Jackson had access to any staff member and all information she considered was necessary to complete her reviews.

Mrs Jackson either interviewed or communicated with the following people during the process: Keith McLaughlin, Mark Rowley, Katherine Gibson, the Chief Technology Officer, a Business Analyst and the person responsible for Help Desk.

4. Reasonable Assurances

Having completed the review, Centrix provides the following reasonable assurances for the period 1 June 2014 to 30 June 2015 ("Period").

Reasonable Assurance **Centrix had policies in place that give effect to the requirements of the Code**
CI 2(a)

Centrix has a number of policies designed specifically to give effect to the requirements of the Code, as well as some general employment policies that are also relevant to Code compliance. These policies are reviewed on a regular basis – for example, when there are amendments to the Code or an amendment is required due to operational matters or a strategic decision. The policies are formally reviewed annually. These policies were in place during the Period. During the Period the following policies underwent a significant review:

1. Access to Credit Information;
2. Correction Requests.

Based on a review of the Code and the policies in place, the Review Committee gives this assurance.

Reasonable Assurance **Centrix had internal procedures and controls in place to give effect to the policies and requirements of the Code.**
CI 2(b)

Centrix had a number of internal procedures and controls in place during the Period to give effect to the policies and requirements of the Code. Some examples are:

- a) The subscriber sign up process. Only certain roles in the organisation have the authority to give a subscriber access and a number of steps must be completed before a subscriber is given access to the bureau.
- b) Providing people access to their credit information. Only certain roles in the organisation have the authority to provide access. There is a clear stepped process that is followed before access to credit information is given.
- c) Staff access rights and changes rights to credit information are based on the duties undertaken by the staff, and were reviewed during the Period.
- d) The formal compliance monitoring procedures.

All staff are required to comply with the policies, procedures and controls (as part of their employment agreement/contractor agreement) and annual training and refresher courses are completed.

During the Period the follow procedures underwent a significant review:

1. Access to Credit Information;
2. Correction Requests.

Based on a review of the policies, internal procedures and controls, the Review Committee gives this assurance.



Reasonable Assurance Centrix provided information and training to its staff to ensure compliance with the policies, procedures and controls.
CI 2(c)

Refresher training on the Code policies, procedures and controls was undertaken during the Period.

Any new staff were inducted on the Code policies, procedures and controls before they undertook any relevant Code duties.

All staff are made aware that Centrix handles sensitive personal information and of the potential repercussions (both to the person whose personal information Centrix holds and the staff member) if the policies, procedures and controls are not met.

Based on this and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Centrix ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information.
CI 2(d)

Centrix' standard subscriber agreements contained Schedule 3 obligations. The subscriber agreement is entered into by the subscriber by either signing the agreement or if using the on-line process, by confirming they agree to the terms and conditions.

All the signed subscriber agreements selected as part of the review contained Schedule 3 obligations. The internal processes require the subscriber to agree to the terms and conditions of the subscriber agreement before a subscriber is given access to the bureau.

The majority of subscribers sign up on-line. The on-line sign up process requires the subscriber to scroll through the subscriber agreement and tick a box confirming they agree to the terms and conditions. An applicant cannot move to the next step in the on-line sign up process if the box is not ticked.

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(a) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix followed its own policies, procedures and controls.

Regular scheduled monitoring for Code compliance and Centrix policies, procedures and controls was undertaken during the Period. This was documented and reviewed by the Code Compliance Committee every quarter.

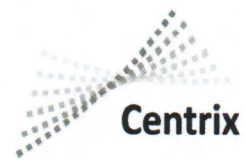
See also Reasonable Assurances CI 2(d), 3(b), 3(c), 3(d), 3(e), 3(f), 3(h), 3(i), 3(j), 3(k).

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(b) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that the information held by Centrix was protected by reasonable security safeguards.

Centrix has security policies and procedures in place to ensure the credit information it holds is protected by reasonable security safeguards. Access to credit information is restricted and monitored. Compliance with the policies and procedures are monitored and reviewed by the Compliance Committee. The policies and procedures are regularly reviewed.

Based on the monitoring undertaken by Centrix during the Period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.



Reasonable Assurance CI 3(c) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed information privacy requests in accordance with rules 6 and 7.

Each quarter monitoring for compliance with Rule 6 (access to credit information) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

All requests for correction of information are recorded on a Register. Each quarter monitoring for compliance with Rule 7 (correction requests) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

The majority of requests for correction of credit information related to default information and in most cases, after Centrix had completed its investigation, the information was corrected in accordance with the request.

Based on the monitoring undertaken by Centrix during the Period for compliance with Rules 6 and 7 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(d) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix took such measures as were reasonably practicable to avoid the incorrect matching of information held by Centrix.

Centrix has detailed processes and business rules for matching credit information. These are all automated. When an incorrect match is identified, it is immediately reviewed by Management to ensure it is not a systemic issue. The Compliance Committee on a quarterly basis reviews any known instances of incorrect matching occurring in the preceding quarter.

Centrix considers people are the best “auditors” of their own information. During the Period, on average, Centrix received well over 50 access requests a day.

At the end of year, the Compliance Committee reviewed the Registers recording correction requests, incorrect matching, any complaints and any other issues raised for the purpose of identifying any matter that may have arisen from incorrect matching.

Based on the very small number of known instances of incorrect matching [3], the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.



Reasonable Assurance CI 3(e) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that the information held by Centrix was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading.

Scheduled quarterly subscriber monitoring checks the accuracy of credit information provided by subscribers that are monitored.

People requesting access to their credit information are the best “auditors” of the credit information held by Centrix. At the end of year, the Compliance Committee reviewed all requests for corrections to credit information and the outcome of those requests.

Based on the low level of corrections made to information during the Period, the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(f) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix’ reporting and retention of credit information was in accordance with rule 9 and Schedule 1

Centrix has automated processes in place that results in:

1. Credit information no longer being reported once the maximum reporting period has been reached;
2. Credit information being deleted before it reaches the maximum retention period.

On a daily basis our Helpdesk reviews credit reports and that includes a review of the reporting and deletion periods as they relate to the information on the credit report.

Based on the automated processes Centrix has in place, the monitoring undertaken by Centrix during the Period for compliance with the maximum reporting and retention periods and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(g) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed direct marketing lists in accordance with rule 10(1C).

Not applicable.

Reasonable Assurance CI 3(h) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed suppression, release or cancellation requests in accordance with Schedule 7.

Each quarter monitoring for compliance with Schedule 7 (suppression process) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

[4]

Based on the monitoring undertaken by Centrix during the Period for compliance with Schedule 7 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(i) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed complaints in accordance with Clause 8.

[5]

Based on the monitoring undertaken by Centrix during the Period for compliance with Clause 8 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(j) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that 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.

The website displayed all the required information (www.centrix.co.nz).

Based on the review undertaken for this assurance, the Review Committee gives this assurance.



Reasonable Assurance CI 3(k) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that subscribers complied with agreements and controls.

Every quarter scheduled monitoring took place of randomly selected subscribers to check subscribers' compliance with the Schedule 3 Code obligations and controls. The outcome of the monitoring and any actions taken were reviewed by the Compliance Committee. Centrix also checks subscriber compliance as part of usual business operations (for example, a business may make an enquiry about Centrix' credit reports and the issue of whether the business has the appropriate consents in place is considered).

Based on the monitoring undertaken by Centrix during the Period for subscribers' compliance and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Sch8 CI 6.1 Centrix undertook monitoring activities to ensure that where clause 4.1 applies, Centrix complied with clause 4.2 (Credit account information).

During the Period, Centrix collected comprehensive credit information for the purpose of credit reporting from externally regulated credit providers. [6]

Based on a review of the process undertaken by Centrix before the uploading of the information and the relevant documentation, the Review Committee gives this assurance.

Reasonable Assurance CI 4(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.

Every quarter, the Compliance Committee considers any identified breaches of agreements, policy, procedure, control or requirement of the Code, and the investigation undertaken and any actions taken.

The two subscriber compliance issues raised in last year's Assurance Report still continue to be the most common compliance issue (Individual authorisation not meeting requirements of Clause 1, Schedule 3 of the Code and Voluntary Collection of Driver Licence Information).

Centrix requests that these two compliance issues are matters for discussion in the 2015 Code review.

Centrix has on occasions during the Period had cause to suspend a subscriber's access to the bureau for failing to co-operate in making changes to their processes so that they comply with the Code obligations in the subscriber agreement.

Based on the investigations and actions undertaken during the Period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 4(b) Where a deficiency was identified in the previous year's report, Centrix, where appropriate, took prompt remedial action.

Not applicable.

5 Additional Information Sought From the Privacy Commissioner

Positive reporting – how positive reporting is going at your agency and any detail that you can provide in terms of compliance and assurance.

[7]

During the Period Centrix received a small number of requests for correction of credit account information. About a quarter of the requests arose due to people not understanding what credit account information was and what it meant. About three quarters of the requests resulted in correction of the information, with the majority of the corrections relating to the account showing as open when it was closed. About a quarter of the requests related to repayment history information showing overdue when it was not.

All subscribers have been responsive to requests for correction of credit account information.

Given the low number of correction requests, Centrix does not consider any additional monitoring or compliance steps need to be taken at this time. Centrix will continue to monitor correction requests to credit account information as part of its usual monitoring processes.

Disputed Debts – how are they treated and your agency's practices and procedures around catching this issue and resolving it.

In the second half of the Period Centrix reviewed its policies and procedures on handling requests for correction of credit information, and this review included how Centrix handles requests for correction of default information.

When a person advises Centrix that the default information listed on their credit file is not correct, Centrix will investigate the correction request to ensure that the default information it holds is accurate, up-to-date, complete, relevant and not misleading (Rule 8).

The term "disputed debt" is commonly referred to situations where the person says it is not their debt, or they dispute that the amount is owed. A disputed debt *is not* where:

1. The person is simply requesting further information about the default. In these circumstances Centrix provides any information it has in relation to the default and for any further information the person is advised to contact the subscriber. If the person follows up with a correction request, then depending on the details of the correction, it may then be treated as a disputed debt.
2. The person initially advises that the debt is disputed and when information about the debt is provided, the person no longer pursues their correction request.
3. The person advises that the balance outstanding is not correct and needs updating. In these circumstances Centrix refers the query back to the subscriber. Most of these requests for correction during the Period resulted in the information being updated.
4. The person acknowledges that the debt is owed, but they had moved addresses or were overseas and so they did not receive the invoices. Information is sought from the subscriber to ensure the requirements of the credit default definition in the Code have been met. Any information provided by the subscriber is then given to the person for



comment. If the requirements of the credit default definition in the Code have been met, and there are no other issues arising, this is not treated as a disputed debt and the credit information will remain listed.

Upon receiving advice from a person that a debt is disputed, Centrix will suppress the default so that the default information will not be reported during the investigation period.¹ The subscriber who loaded the default will be notified of the correction request and the reasons given by the person. The subscriber will be asked for a response and to provide any supporting information they may have to confirm the loading of the default information.

[8]

If the subscriber provides a response and information supporting the default, this information is reviewed by Centrix, and provided to the person for comment. Centrix then considers the information provided by the subscriber and the person and makes a decision on whether the default remains listed on the bureau in light of its obligations to ensure that the default information it holds is accurate, up-to-date, complete and not misleading.

Centrix does not consider its role is to arbitrate on factual disputes and if there is a dispute then Centrix will make a decision that it can no longer use the default information and it will be removed from the bureau.

If there is a preliminary decision made that the debt is not genuinely disputed, then the matter will be referred to Management for a decision on whether it is clear the debt is not genuinely disputed based on the information that Centrix has. Centrix considers it has a responsibility to investigate all disputed debts. If Centrix was to simply remove all defaults on a request by a person this may quickly become known as an easy way for people to remove genuine defaults from the bureau. Over time this would have a detrimental impact on the number of credit defaults listed by bureaux reducing the value of information being made available to credit providers when making a credit decision.

If a decision is made that the debt is disputed, the default information will continue to be suppressed until such time as it is deleted in the next batch of deletions of disputed default information. Centrix has considered whether it can continue to report the default with a note on the default that it is disputed. Centrix takes the view that this would not be in accordance with its accuracy obligations (Rule 8).

If a decision is made that the debt is not genuinely disputed, the person is advised of this and the reasons behind the decision. They are also advised that a note can be placed on the file about the request to remove the default and of their right to complain to the Privacy Commissioner.

[9]

¹ Note this is different to a correction request to the balance outstanding. In this instance, the default information is flagged as under investigation with a note that the person has advised that a payment has been made.



Every quarter a review of the corrections request register takes place. If there is a trend emerging that one particular subscriber is loading debts that are disputed, Centrix will investigate the issue with the subscriber to ensure that the subscriber is complying with its subscriber obligation to ensure that before it provides Centrix' with information it takes steps to ensure the information is accurate.

Centrix considers that it has appropriate policies and procedures in place to handle requests for correction of default information by a person that a debt on their credit file is disputed. Centrix will continue to monitor correction requests to default information as part of its usual monitoring processes.

Centrix looks forward to discussing this issue with the Office of the Privacy Commissioner once they have had an opportunity to consider this Report.

Defaults – issues surrounding defaults that are no longer maintained by creditors. If a record of a default is not updated, what is the agency's practice?

Centrix' subscriber agreement requires the subscriber to update default information as soon as reasonably practicable. Where the subscriber advises Centrix that it is no longer maintaining a default, or Centrix becomes aware that a subscriber is no longer maintaining a default and has no intention to do so, Centrix' policy is to immediately suppress the default and the default will be deleted in the next batch of deletions of default information. It does this as it considers it will be unable to satisfy the accuracy requirements of the Code if it continues to report the information (Rule 8).

Generally, subscribers no longer maintain a default where:

1. The subscriber sells the debt;
2. The subscriber (being a debt collector) is no longer collecting the debt;
3. The debt has been written off by the subscriber; or
4. The subscriber decides that it no longer wants to list default information with a credit bureau.

Landlords – landlord's access to credit reporting was a feature in the Orcon case. We would like to hear about systems your agency operates in managing risks to landlord access.

Centrix manages risks to landlord access as follows:

1. When they sign up as a subscriber, they are required to scroll through the subscriber agreement and confirm they agree.
2. The landlord is also required to confirm it has policies and procedures in place to ensure compliance with the subscriber agreement.
3. The Landlord does not have access on account. Each time a landlord seeks to use the bureau, they must pay in advance by credit card.
4. Landlord's form part of Centrix' quarterly monitoring.

[10]

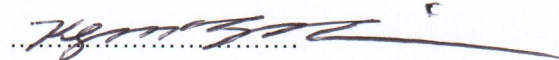
Centrix considers it has reasonable processes in place.

Reviewing the policies and procedures on landlord access was a matter that was identified by the Compliance Committee earlier this year. The review is due to take place in the second half of this year with any changes to the processes put in place by the end of this year. Centrix would welcome a discussion on this issue with the Office of the Privacy Commissioner.

Reporting of judgments – can you elaborate on your process for dealing with compliance of Rule 11(2A) in particular, that information is not reported on for 5 years after date of judgment.

Centrix obtains judgment information from a third party provider. That third party provider provides the date the judgment is sealed. This date is the trigger date for the 5 years reporting period, and the 6 years retention period. Centrix has in place automated processes whereby the judgment will be automatically suppressed (not reported on) from 5 years from the date the judgment is sealed, and the judgment will automatically be deleted 6 years from the date the judgment is sealed.

Dated 28 September 2015

A handwritten signature in black ink, appearing to read "Keith McLaughlin", written over a dotted line.

Keith McLaughlin
Managing Director and
Chairman Review Committee

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 financial industries. Mrs Jackson is currently employed by Vero New Zealand Ltd as an Executive Manager – Support Services, NZ Shared Services. 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 all internal audits, along with the annual external 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.



**Schedule 2
Summary of Information Reviewed**

Information	Assurances
The Code 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 to give effect to the Code policy and requirements.	CI 2(a)
The internal procedures and controls Centrix has in place to give effect to the Code (for example bureau access and change rights, password controls and access log procedures).	CI 2(b)
The Code information, policies and the training undertaken by staff during the period under review and the staff acknowledgement forms.	CI 2(c)
The standard subscriber agreements in place during the period under review.	CI 2(d)
The subscriber on-line sign up processes.	CI 2(a), (b)
Application for Get My Credit Report (request for access to credit information) and request for correction of information and reviewed the process that was followed.	CI 2(a), (b)
Application for suppression request and reviewed the process that was followed.	CI 2(a), (b)
Information security policies, procedures and reports.	CI 2(a), (b)
Matching rules and processes.	CI 2(a), (b)
Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), (b)
Credit account information procedures prior to upload	CI 2(a), (b), Sch 8 CI 6.1
Centrix' website.	CI 3(j)
Compliance monitoring procedures.	CI 2(a), 2(b) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(h), 3(i), 3(j), 3(k) Sch 8 CI 6.1, CI 4(a)
Scheduled monitoring undertaken during the period.	CI 2(a), 2(b) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(h), 3(i), 3(j), 3(k), Sch 8 CI 6.1, CI 4(a)
All Compliance Committee papers, meeting minutes, Compliance Reports, Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), 2(b) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(h), 3(i), 3(j), 3(k), Sch 8 CI 6.1, CI 4(a)