



17 August 2020

Codes Reissue Submissions
Office of the Privacy Commissioner
PO Box 466
AUCKLAND 1140

By email to: privacy.code@privacy.org.nz

Dear Privacy Commissioner

Equifax Submission on Revocation and Replacement of Credit Reporting Privacy Code under the Privacy Act 2020

We refer to the Revocation and Replacement of Credit Reporting Privacy Code under the Privacy Act 2020 Information Paper ("**Information Paper**").

Equifax is one of three credit reporting agencies in New Zealand and is regulated by the Credit Reporting Privacy Code 2004 ("**Code**"). We are grateful for the opportunity to make a submission on the Code changes. We have reviewed the Code changes and agree with the changes set out in the Draft Consultation.

We note there were eight specific questions in the Information Paper seeking a response from us. We answer all these questions in the affirmative, that is, we agree with the proposed changes that have been included in these questions.

We further note we have read the submission by the Financial Services Federation and support their submission, including their reasons for also responding to the questions in the Information Paper in the affirmative.

The only change we note is a typo in the Contents to the Code, which incorrectly refers to *health* information instead of *credit* information in Rule 12.

We are comfortable that our submission may be made public by the Privacy Commissioner or may be released under the Official Information Act 1982.

Please do not hesitate to contact the writer if you have any queries on our submission.

Yours sincerely

Deborah Malaghan
Head of Legal
Equifax New Zealand Information Services and Solutions Limited