

**Centrix lodged their submission with OPC on 13 June 2017 over the phone.**

This is a record of that phone call:

Centrix called in regards to OPC's proposal to amend the Credit Reporting Privacy Code (CRPC) as a result of changes made to the Privacy Act following the assent of the Intelligence and Security Act.

Centrix said that nothing in our proposed amendments to the CRPC was a complete no go for them but it did have some suggestions and queries.

Centrix questioned whether OPC should include a definition of an intelligence and security agency in the CRPC.

Centrix noted an error in the wording contained in OPC's draft Schedule 3A – where OPC refers to a 'credit provider' and it should be 'credit reporter'.

Centrix queried whether it was OPC's intention for the agencies to be able to verify drivers licenses through credit reporters and if so then Schedule 5 would need amending.

Centrix also queried whether the exception for access agreements should be under subsection 2 not subsection 1. It drew parallels between the Police and the intelligence and security agencies, noting that in order for credit reporters to disclose information to the Police this is done via a subscriber agreement eg (2)(c)(i). Centrix noted that the Notes section of the Code states that different subscribers may have different parts of the subscriber agreement apply to them ie all the provisions contained in Schedule 3 do not apply to Police. Centrix therefore thinks it would be cleaner and less complicated for the credit reporters to have the agencies under Schedule 3 rather than a new Schedule 3A.

Centrix said that it was concerned that the agencies could potentially request information for release under the general subsection(1) exception even if it was for security vetting. Centrix said that sometimes it can be difficult to verify what the request is for and whether it is necessary given the nature of the intelligence agencies.

Centrix also raised a question regarding whether OPC should align Rule 10 with the amendment to IPP 10 in the Act, because rule 10 and 11 are often seen as a set. Centrix said there was an argument for consistency as disclosures are often seen as a use of information.