

## **Equifax Verification Exchange® PRIVACY COLLECTION STATEMENT**

**14 October 2024**

Equifax Australasia Workforce Solutions Pty Limited ABN 86 080 799 720 (**we, us, our**) is committed to protecting the privacy of your personal information.

We collect and handle your personal information in accordance with our legal obligations, including those under the Australian Privacy Act 1988 (Cth) and the New Zealand Privacy Act 2020 (NZ) (**Privacy Laws**).

We are required by those Privacy Laws to provide information to you about how we collect, use, store and disclose your personal information. This Privacy Collection Notice and Consent document provides you with details in relation to this. Particulars of our identity and contact details are at the end of this notice.

For the purposes of this Privacy Collection Notice and Consent Document, any reference to “**verifier**” is a reference to a third-party entity whom you have authorised to act on your behalf such as

- a. a lender, credit provider, finance broker, finance introducer, buy now pay later service provider selected by you, and/or;
- b. a third-party entity approached and/or selected on your behalf by a finance broker, finance introducer or other third party,

seeking to determine whether you are entitled to a service or benefit.

### **Why we collect your personal information**

We collect your personal information to:

- (a) satisfy ourselves that you are the employee of an employer in respect of whom we may provide services;
- (b) enable us to provide, or attempt to provide, data services for you when you require employment and employment income verification services at the request of a third-party **verifier**, such as a lender, credit provider, buy now pay later service provider or other entity, seeking to determine whether you are entitled to a service or benefit;
- (c) if required by that **verifier**, manipulate that information into a format consistent with the process requirements of that **verifier** and as specified by it, and
- (d) deidentify that information, to develop and offer multi-data insights, credit research or other reports and market benchmarking analyses to your employer, a **verifier** or other parties.

For purposes of this document, “employer” may also include any entity that has retained your services under contract or other similar service arrangement.

### **What personal information do we collect?**

The personal information we collect about you includes (or may include):

- (a) your name, photo, contact details, date and place of birth, gender, place of work and position title, current and previous residential address(es) and other data (such as a Driver Licence) as may be required to conduct:
  - document verification against the records of a document issuer or Official Record Holder;
  - biometric or manual identity matching; or
  - alternative proof of identity checks, and matching against employment records;

- (b) *your Employment Data as made available, directly or indirectly, by your employer (which may include employer details, length of time of employment, job title, status type, any special conditions or explanations, and similar information); and*
- (c) *your Income Data as made available, directly or indirectly, by your employer (which may include gross annual income, base pay, recent pay period details, commissions, superannuation payments, study loan or other tax categorisations, and similar information).*

### **How we collect your personal information**

*We collect your personal information comprising Employment Data and Income Data from your employer or past employer, or from an intermediary (such as a Payroll Services Provider) retained by or on behalf of that employer, as our customer. When we collect your personal information from a Payroll Service Provider (such as an STP digital service provider or superannuation clearing house provider, which lawfully holds your personal information collected for a different purpose) we may act as your intermediary – consistent with your consent – to access data held about you in accordance with your right of access under the Privacy Act 1988 (Cth) and, in particular, APP 12.*

*We also collect your personal information directly from you, or through your **verifier**, to verify your identity as the employee of an employer in respect of whom we may provide services.*

*We will also, through our services, obtain personal information about who you have approached or had dealings with for a loan or other service or benefit, by your **verifier** providing or accessing your personal information under the consent you provide to them.*

### **You may choose what personal information you provide to us**

*It is up to you what personal information you provide to us in addition to any records supplied by or on behalf of an employer. However, if you choose not to provide certain information, it may affect the way we can interact with you or whether we can interact at all in providing our services. For example, if you:*

- (a) *initially provide appropriate ID documentation details on-line, we still will require further information from you for a manual work-around service (where that is availed of by your **verifier**) or to assist you with any data dispute; or*
- (b) *do not provide sufficient information, or we are otherwise not able to satisfy ourselves as to your identity, we may refuse to supply you or a relevant **verifier** with our information services.*

### **How we use your personal information**

*In providing our information services, you accept that:*

- (a) *the primary purpose for collecting your personal information is to generate and manage the provision of a report regarding either or both your employment and employment income, to a **verifier**, for your benefit or other use by that **verifier**.*
- (b) *a file will be created for you using your personal information when either you or your **verifier** access the information services, with relevant information also used (or disclosed to one or more related companies) for support services such as document verification, biometric matching, operations support, invoicing or report purposes;*
- (c) *we may use shortened or alternate first names, prior postcodes, or otherwise adjust personal information to enable matching with record formats maintained by an employer or intermediary retained by or on behalf of that employer;*

- (d) *we are only likely to disclose your personal information to overseas recipients where:*
- *you choose to provide your consent to a **verifier** which is a branch of a foreign entity or which otherwise has a foreign activity (such as a processing centre) or presence (in which case, the recipients are likely to be in those relevant jurisdictions in which that entity is established or the activity operates, and we disclose your information on the basis that your **verifier** has made appropriate cross-border disclosures to you in accordance with APP 8); or*
  - *that personal information is accessed by a Parent entity in providing us with technical, security and data validation support for Data stored on the Equifax Verification Exchange®, in which case the information will remain in Australia and the entity is contractually obliged to access and handle any such information in accordance with the APPs set out in the Privacy Act 1988 (Cth);*
- (e) *where we do disclose your personal information to overseas recipients, the types of personal information we may disclose include identification information, such as your name, address, and date of birth, as well as your employment and employment income information;*
- (f) *where your **verifier** requires that your personal information be manipulated into a format consistent with its process requirements (as specified by it) before receiving that personal information from us, we may use and disclose your personal information for that secondary purpose, that purpose being directly related to the primary purpose of its collection;*
- (g) *where you provide an identity document to us, you may have your identity information verified with the document issuer or Official Record Holder;*
- (h) *we may act as your intermediary and use and disclose your personal information to your employers (or to Payroll Service Providers who might act on behalf of your employers) to identify you;*
- (i) *we may make your personal information available, including a document provided by you, to a relevant government authority or an issuing body (or, with your consent, to a designated person that can certify an identity declaration for the purposes of identity proofing), to satisfy ourselves as to your claimed identity or the legitimacy of the identity documents supplied by you; and*
- (j) *we and our related companies may, at any time, use and disclose your personal information to:*
- *monitor traffic on our website;*
  - *undertake data management for quality or operational purposes (and, where any such data contains sensitive information, that data will be de-identified to protect you, and this functionality is within your reasonable expectations);*
  - *diagnose data collection issues (with any technical navigation information required for that purpose purged immediately after a problem (if any) has been remedied);*  
*and*
  - *investigate any complaint made by you or on your behalf, either privately or by a relevant regulator or law enforcement agency.*

*Our Privacy Policy also contains information about how we handle personal information and is available at [www.equifax.com.au/hrsolutions/pdf/privacy.pdf](http://www.equifax.com.au/hrsolutions/pdf/privacy.pdf).*

*We may also de-identify your Data to develop and offer multi-data insights, credit research or other reports and market benchmarking analyses to your employer, a **verifier** or other third parties.*

### ***How we store and disclose your personal information***

As outlined in the description of our use of your personal information, we may use or disclose your personal information:

- (a) in and to generate our report to a **verifier**, where you have provided a relevant consent for us to do so for your benefit;
- (b) to you or your **verifier**, in responding to any requests or queries raised with us; and
- (c) for operations support and to other companies related to us, in particular those which provide services to us.

We store your information until such time as we no longer need it for a purpose that is permitted under the APPs, at which time we take reasonable steps to destroy or de-identify that personal information. When your personal information is used for data analytics, it will always be de-identified.

In dealing with a **verifier**, we obtain and supply your personal information through various channels enabling (in the usual course) secure download through our website; we may also handle Data by SFTP interface, an approved Secure Adhoc Transfer (SAT) Portal (for a temporary portal accounts) or through encrypted SMTP file transfer. A **verifier** should deal with that and other personal information in accordance with any privacy policy or other privacy statement or requirement it operates under. We expect a **verifier** not to make any adverse decision based in whole or part upon the Data without first providing you with a copy of that.

When you communicate with us or a **verifier** by e-mail, or choose to provide (or have your employer provide) or receive personal information by e-mail, you acknowledge that e-mail is not a secure form for transmitting information and that any communications transmitted over it may be intercepted or accessed by unauthorised or unintended parties, may not arrive at the intended destination or may not arrive in the form transmitted. In such circumstances, we take no responsibility for communications transmitted by email and give no assurance that such communications will remain confidential or intact. Any such communications are at your sole risk, as are any communications between you and a **verifier** you choose to deal with.

Where our information services are accessed through means or in formats other than by use of our on-line services as recommended and provided by us, you remain responsible for reviewing all pertinent portions of our services, including any relevant disclosures and disclaimers.

Other than where personal information is shared with an offshore third party as is reasonably necessary for one or more of the functions or activities covered by this Statement, we store, use and process your personal information in Australia on our secure information technology servers, including hosting through our Virtual Private Cloud using servers located in Australia under a managed services/SaaS model (where the vendor does not access or process Data).

### **Privacy Policy, identity and contact details**

Our Privacy Policy contains information about how you may access and seek correction of your personal information held by us, or make a privacy complaint, and how we will deal with such a complaint. Our Privacy Policy and contact details are available at:

[www.equifax.com.au/hrsolutions/pdf/privacy.pdf](http://www.equifax.com.au/hrsolutions/pdf/privacy.pdf).

### **Interpretation**

Terms defined by:

- our Terms of Supply (accessible at [www.equifax.com.au/hrsolutions/pdf/terms-of-supply.pdf](http://www.equifax.com.au/hrsolutions/pdf/terms-of-supply.pdf)) or

- the Verifier Service Terms (accessible at <https://www.equifax.com.au/hrsolutions/pdf/verifier-terms-of-use.pdf>)

*have the same meaning where used in this statement, unless the context otherwise requires.*

*This Collection Statement is governed by the law of New South Wales, and the parties submit to the non-exclusive jurisdiction of the courts of New South Wales and any courts hearing appeals therefrom.*