

**Verification Exchange™ PRIVACY COLLECTION STATEMENT**  
**21 December 2018**

We are required by law (in Australia and New Zealand) to provide information to you about how we collect, use, store and disclose your personal information. This document provides you with the details in relation to this. Particulars of our identity and contact details are at the end of this notice.

**Why we collect your personal information**

We collect your personal information to:

- (a) satisfy ourselves that you are the employee of an employer we provide services for;
- (b) enable us to provide data services for you, on behalf of your employer, when you require income and employment verification services at the request of a verifier such as a lender, credit provider or other entity seeking to determine whether you are entitled to a benefit; and
- (c) deidentify that information, to develop and offer multi-data insights, reports and market benchmarking analyses to your employer and 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 as may be required to conduct:
  - document verification against the records of a document issuer or Official Record Holder; and
  - biometric or manual identity matching; or
  - alternative proof of identity checks;
- (b) your Employment Data as made available by your employer (which may include employer details, length of time of employment, job title and similar information); and
- (c) your Income Data as made available by your employer (which may include gross annual income, base pay, recent pay period details, commissions and similar information).

**How we collect your personal information**

We initially collect your personal information regarding Employment Data and Income Data from your employer or past employer as our customer.

We will also collect your personal information directly from you, to verify your identity as the employee of an employer we provide services for.

We will also, through our services, obtain personal information about who you have approached or had dealings with for a loan or other benefit, through that third-party verifier accessing your personal information by use of the authorisation code 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 records supplied by your 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 do not:*

- (a) initially provide appropriate photo ID documentation on-line, we will require further information from you for a manual work-around service; or*
- (b) provide sufficient information, or we are otherwise not able to satisfy ourselves as to your identity, we may refuse to supply you and your employer (as relevant) 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 income, to a verifier selected by you, for the benefit of both you and your employer;*
- (b) an account will be created for you using your personal information when you access the information services, with relevant information also disclosed to one or more related companies for document verification, biometric matching, invoicing or report purposes;*
- (c) we are only likely to provide your personal information to overseas recipients where:*
  - you choose to provide your authorisation code 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); or*
  - that personal information is accessed by our Parent in providing us with technical, security and data validation support for Data stored on the Verification Exchange™, in which case the Parent is contractually obliged to access and handle any such information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth);*
- (e) where you provide an identity document to us, you may have your identity information verified with the document issuer or Official Record Holder;*
- (f) 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), if we are not satisfied as to your claimed identity or the legitimacy of the identity documents supplied for purposes of an authorisation code application; and*
- (g) 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/hr solutions/pdf/privacy.pdf](http://www.equifax.com.au/hr solutions/pdf/privacy.pdf).*

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

### ***How we store, use 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 our report to a verifier, where we have provided you with an authorisation code and you have made that code available to that verifier; and*
- (b) to other companies related to us, in particular those which provide services to us.*

*When your personal information is used for data analytics, it will always be de-identified.*

*We supply your personal information to a verifier through download from our website. When you receive or share an authorisation code by e-mail, or choose to 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 over the internet 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 the verifier you choose to deal with.*

*Where our information services are accessed through means or in formats other than by use of our app and on-line as originally intended 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 off-shore 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/hr solutions/pdf/privacy.pdf](http://www.equifax.com.au/hr solutions/pdf/privacy.pdf).*

### ***Interpretation***

*Terms defined by our Terms of Supply (accessible at [www.equifax.com.au/hr solutions/pdf/terms-of-supply.pdf](http://www.equifax.com.au/hr solutions/pdf/terms-of-supply.pdf)) or the Verification Exchange™ SOW (accessible at [www.equifax.com.au/hr solutions/pdf/vesow.pdf](http://www.equifax.com.au/hr solutions/pdf/vesow.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.*