



Annual Report

Under Clause 23.11 of the Credit Reporting Privacy Code 2014
for the period 1 July 2019 – 30 June 2020

August 2020

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illion.com.au

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1. INTRODUCTION

1.1 Clause 23.11 of the Privacy (Credit Reporting) Code 2014 (“CR Code”) requires a illion to publish on its website a report that includes the information specified in clause 23.11 of the CR Code (“the Report”).

1.2 In summary, the Report must include:

- a. Statistics on access requests, corrections, complaints and serious credit infringements;
- b. An overview of the monitoring and auditing activity;
- c. Information about the disclosure to the CRB of comprehensive credit reporting information, being consumer credit liability information and repayment history information; and
- d. Any other information requested by the OAIC.

1.3 This report is for the period 1 July 2019 to 30 June 2020 and has been prepared in accordance with the requirements of clause 23.11 of the CR Code.



2. ABOUT illion

illion Data Registries Pty. Ltd is illion's consumer credit reporting body ("CRB"), providing consumer credit related products and services including consumer credit reporting, and fraud detection and prevention including identity verification through bureau header data.

illion Data Registries Pty. Ltd

DUNS 75 014 4649

ABN 38 101 620 446

ACN 101 620 446

3. ACCESS

3.1 The below statistics relate to the number of individuals who accessed their own credit reporting information during the reporting period.

<p>% Individuals provided access without charge</p>	<p>23.11 (a) % = $AI(WC) / IND \times 100$</p> <p>AI(WC) = the number of individuals given access to their credit reporting information (without charge) by the CRB during the reporting period</p> <p>IND = the number of individuals about whom credit information is held at the end of the reporting period</p> <p>3.90% of individuals about whom credit information was held at the end of the reporting period were given access to their credit reporting information free of charge. When requested online these reports are supplied by illion within 3 business days of receipt of the request.</p>
<p>% Individuals provided access with a charge</p>	<p>23.11 (b) % = $AI(C) / IND \times 100$</p> <p>AI(C) = the number of individuals given access to their credit reporting information by the CRB during the reporting period where the individual used a fee-based service</p> <p>IND = the number of individuals about whom credit information is held at the end of the reporting period</p> <p>0.00% of individuals about whom credit information was held at the end of the reporting period were given access to their credit reporting information where the individual used a fee-based service.</p> <p>illion does not charge for access.</p>

4. CORRECTIONS

- 4.1. A correction request is a request received from an individual requesting correction of their credit information.
- 4.2. The below statistics relate to the number of corrections received and completed and the type of corrections made during the reporting period.

<p>% Correction requests received</p>	<p>23.11 (c) % = $CR / IND \times 100$</p> <p>CR = the number of correction requests received by the CRB during the reporting period</p> <p>IND = the number of individuals about whom credit information is held at the end of the reporting period</p> <p>0.18% of individuals about whom credit information was held at the end of the reporting submitted correction requests during the reporting period.</p>
<p>% Successful corrections</p>	<p>23.11 (d) % = $SCR / CR \times 100$</p> <p>SCR = the number of successful correction requests, that is, correction requests received by the CRB during the reporting period where the CRB was satisfied that a correction should be made</p> <p>CR = the number of correction requests received by the CRB during the reporting period</p> <p>31.89% of correction requests received during the reporting period resulted in a correction being made, based on illion's assessment that a correction should be made.</p>
<p>Corrections finalisation period</p>	<p>23.11 (e) Average days = TD / TC</p> <p>TD = the total number of calendar days taken from receipt to finalisation for all correction requests finalised by the CRB during the reporting period</p>

	<p>TC = the total number of corrections finalised by the CRB during the reporting period</p> <p>The average number of days taken from receipt to finalisation of a correction request was 34 days.</p>																						
<p>% Other corrections made</p>	<p>23.11 (f) % = $OCR / IND \times 100$</p> <p>OCR = the number of other corrections, that is, corrections made by the CRB during the reporting period that were not made in response to a correction request from the relevant individual</p> <p>IND = the number of individuals about whom credit information is held at the end of the reporting period</p> <p>The percentage of other corrections, that is, corrections made by illion as a result of a request from a party other than the individual was 0.30%</p>																						
<p>Types of corrections made</p>	<p>23.11 (g) The types of correction requests received and made during the reporting period are depicted below:</p> <table border="1" data-bbox="571 826 1852 994"> <thead> <tr> <th>Defaults</th> <th>Enquiry</th> <th>Access</th> <th>Judgment</th> <th>Identification Error</th> <th>Personal Details</th> <th>Personal Insolvency Information</th> <th>Serious Credit Infringement</th> <th>RHI</th> <th>CCLI</th> <th>Other Public Record</th> </tr> </thead> <tbody> <tr> <td>48.19%</td> <td>25.67%</td> <td>0.00%</td> <td>8.69%</td> <td>0.17%</td> <td>3.86%</td> <td>0.03%</td> <td>0.12%</td> <td>8.18%</td> <td>3.67%</td> <td>1.42%</td> </tr> </tbody> </table> <p>The industry sectors from which the information originated that was corrected includes Banking and Finance, Telecommunication, Utilities, and Other.</p>	Defaults	Enquiry	Access	Judgment	Identification Error	Personal Details	Personal Insolvency Information	Serious Credit Infringement	RHI	CCLI	Other Public Record	48.19%	25.67%	0.00%	8.69%	0.17%	3.86%	0.03%	0.12%	8.18%	3.67%	1.42%
Defaults	Enquiry	Access	Judgment	Identification Error	Personal Details	Personal Insolvency Information	Serious Credit Infringement	RHI	CCLI	Other Public Record													
48.19%	25.67%	0.00%	8.69%	0.17%	3.86%	0.03%	0.12%	8.18%	3.67%	1.42%													

5. COMPLAINTS

<p>% Complaints received</p>	<p>23.11 (h) % = $C / IND \times 100$</p> <p>C = the number of complaints received by the CRB during the reporting period</p> <p>IND = the number of individuals about whom credit information is held at the end of the reporting period</p> <p>0.00% of individuals about whom credit information was held at the end of the reporting period submitted a complaint during the reporting period.</p>												
<p>Types of complaints</p>	<p>23.11 (i) Information about the types of complaints that were received by the CRB during the reporting period (including a % figure for each complaint type against all types) is as follows:</p> <table border="1" data-bbox="591 767 1189 1038"> <thead> <tr> <th>Types of Complaints</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Credit Report Content</td> <td>93.69%</td> </tr> <tr> <td>Access</td> <td>3.60%</td> </tr> <tr> <td>illion Service</td> <td>2.25%</td> </tr> <tr> <td>Credit Score</td> <td>0.45%</td> </tr> <tr> <td>Total</td> <td>100.0%</td> </tr> </tbody> </table>	Types of Complaints	%	Credit Report Content	93.69%	Access	3.60%	illion Service	2.25%	Credit Score	0.45%	Total	100.0%
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<p>% Complaints finalised</p>	<p>23.11 (j) % = $F / IND \times 100$</p> <p>F = the number of complaints finalised by the CRB during the reporting period</p> <p>IND = the number of individuals about whom credit information is held at the end of the reporting period</p> <p>0.00% of individuals about whom credit information was held at the end of the reporting period submitted a complaint that was finalised during the reporting period.</p>												

<p>Complaint finalisation period – the average number of days taken to finalise a complaint</p>	<p>23.11 (k) Average days = TD/ TCP</p> <p>TD = the total number of calendar days taken from receipt to finalisation for all complaints finalised by the CRB during the reporting period</p> <p>TCP = the total number of complaints finalised by the CRB during the reporting period</p> <p>The average number of days taken from receipt to finalisation for all complaints finalised by illion’s internal dispute resolution process during the reporting period was 21 days.</p> <p>The average number of days taken from receipt to finalisation for all complaints finalised through the external dispute resolution process (AFCA) during the reporting period was 48 days</p>												
<p>Complaint outcomes</p>	<p>23.11 (l) Information about the outcomes of the complaints finalised during the reporting period (including a % figure for each outcome type against all outcomes) is as follows:</p> <table border="1" data-bbox="591 842 1554 1278"> <thead> <tr> <th>Resolution Outcome</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Credit Information Updated</td> <td>80.09%</td> </tr> <tr> <td>Explanation on information held</td> <td>10.41%</td> </tr> <tr> <td>Required Information Provided</td> <td>2.71%</td> </tr> <tr> <td>Other</td> <td>6.79%</td> </tr> <tr> <td>Total</td> <td>100.0%</td> </tr> </tbody> </table>	Resolution Outcome	%	Credit Information Updated	80.09%	Explanation on information held	10.41%	Required Information Provided	2.71%	Other	6.79%	Total	100.0%
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6. SERIOUS CREDIT INFRINGEMENTS

6.1 A serious credit infringement is where, in the opinion of a credit provider, an individual has committed an act involving fraudulently obtaining or attempting to obtain consumer credit, or fraudulently evading or attempting to evade their obligations in relation to consumer credit.

6.2 A serious credit infringement is further defined as where a reasonable person would consider that the act indicates an intention by the individual to no longer comply with their obligations in regards to the consumer credit provided, the credit provider has taken reasonable steps to contact the individual but has been unable to do so, and at least six months have passed since the credit provider last had contact with the individual.

6.3 The below statistics relate to the number of serious credit infringements reported to the credit reporting body and the coverage in each sector.

<p>% Serious credit infringements disclosed</p>	<p>23.11 (m) % = $SCI / IND \times 100$</p> <p>SCI = the total number of times during the reporting period that a credit provider disclosed an opinion to the CRB that an individual had, in circumstances specified by the provider, committed a serious credit infringement</p> <p>IND = the number of individuals about whom credit information is held at the end of the reporting period</p> <p>0.00% of all individuals about whom credit information was held had a serious credit infringement disclosed by a credit provider during the reporting period.</p>
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% Serious credit infringements
by sector

23.11 (n) % = $SCI(S)/SCI \times 100$

SCI(S) = the number of times during the reporting period that a CP from a particular sector disclosed an opinion to the CRB that an individual had, in circumstances specified by the provider, committed a serious credit infringement

SCI = the total number of times during the reporting period that a CP disclosed an opinion to the CRB that an individual had, in circumstances specified by the provider, committed a serious credit infringement

Sector	Percentage
Financial Services	20.8%
Other	79.2%
Total	100.0%

7. MONITORING AND AUDITING ACTIVITIES (23.11 (o))

7.1 The Privacy Act and the Privacy (Credit Reporting) Code 2014 ('CR Code'), have audit provisions with which a Credit Reporting Body is required to comply. As required by the CR Code, illion has developed a risk-based approach to identify Credit Providers (CPs) that present a high risk of non-compliance with their contractual obligations with regard to data quality, data protection, and correction of data.

7.2 The basis of these requirements is to ensure:

- (a) That credit information that the CP discloses to illion is accurate, up-to-date and complete;
- (b) That credit reporting information that illion discloses to the CP is protected by the CP from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- (c) That the CP takes steps in relation to requests to correct credit-related personal information required by Part IIIA, the Regulations and the CR code.

7.3 Risk-based framework and approach to assessing CP non-conformance with the CR Code:

7.3.1 In accordance with the requirements under the CR Code, illion has a framework to monitor the risk of CP's conformance with the CR code.

7.3.2 The framework considers a number of factors that illion believes provides an indication as to the relative risk of non-conformance with the CR code, including:

- (a) Size and structure of the CP;
- (b) The CP's approach to data and information security and whether the credit-related personal information held by the CP is protected by reasonable security safeguards;
- (c) Whether the CP follows its own policies, procedures and controls;
- (d) The results of illion's monitoring of correction requests either from the CP or individuals;

- (e) The volume, outcome and proportion of complaints received by illion from third parties including whether or not these complaints resulted in a correction to the relevant file(s);
- (f) The timeframe and process required for the CP to confirm it has made corrections (where appropriate) to its credit-related personal information;
- (g) The results of any past audits of CP's compliance with the obligations under paragraph 23.1 of the CR Code.

7.3.3 illion also has established procedures for considering the credentials of credit providers prior to the collection from, and disclosure to, them of credit information. illion has established a data quality monitoring team that is constantly reviewing the data supplied to it by its various subscribers to ensure this is in line with expectations, and user access to credit information.

7.4 There were a number of reviews and remedial actions taken during the reporting period covering the utility, financial services and telecommunications sectors. These included commercial credit listed as consumer matters, failure to show appropriate notices were sent, failure to send appropriate notices to both parties for joint accounts and an entity testing its system using the live environment. All were resolved in consultation with the relevant entities, two additional reviews were conducted with remedial action being finalised outside the reporting period.

illion will continue to develop its monitoring and review process to ensure it is both effective in identifying non-conformance risk as well as being efficient and effective in its application.

8. DISCLOSURE TO THE CRB OF CONSUMER CREDIT LIABILITY INFORMATION AND REPAYMENT HISTORY INFORMATION

- 8.1 Information about the take-up of the new types of credit-related personal information permitted to be held in the credit reporting system from 12 March 2014, including:
- 8.2 New types of credit-related personal information including Consumer Credit Liability Information (CCLI) and Repayment History Information (RHI).
- 8.3 Consumer Credit Liability Information is information about:
- (a) The name of the CP;
 - (b) Whether the CP is a licensee;
 - (c) The type of consumer credit;
 - (d) The day the consumer credit is entered into;
 - (e) The terms or conditions of the consumer credit relating to repayment of the amount of the credit that are prescribed by the Regulations;
 - (f) The maximum amount of available credit;
 - (g) The day on which the consumer credit is terminated or otherwise ceases to be in force.
- 8.4 Repayment History Information is information about:
- (a) Whether an individual has met an obligation to make a monthly payment that is due and payable in relation to consumer credit;
 - (b) The day the monthly payment is due and payable;
 - (c) If late payment is made, the day on which the individual makes that payment.

8.5 The below statistics relate to the disclosure of new types of credit-related personal information.

<p>% Disclosure to the CRB of consumer credit liability information</p>	<p>23.11 (p)(i) % = $CCLI / CP \times 100$</p> <p>CCLI = the number of CPs that disclosed consumer credit liability information to the CRB during the reporting period</p> <p>CP = the total number of CPs that disclosed any credit information to the CRB during the reporting period</p> <p>The percentage of CPs that disclosed CCLI to illion during the reporting period was 18.32%</p>
<p>% Disclosure to the CRB of repayment history information</p>	<p>23.11 (p)(ii) % = $RHI / CP \times 100$</p> <p>RHI = the number of CPs that disclosed repayment history information to the CRB during the reporting period</p> <p>CP = the total number of CPs that disclosed any credit information to the CRB during the reporting period</p> <p>The percentage of CPs that disclosed RHI to illion was 16.33%</p>

9. GLOSSARY

CCR	Comprehensive Credit Reporting
OAIC	Office of the Australian Information Commissioner
illion	illion Data Registries Pty Ltd.
CRB	Credit Reporting Body
CP	Credit Provider
SCI	Serious Credit Infringement
CCLI	Consumer Credit Liability Information
RHI	Repayment History Information