



Annual Report

Under Clause 23.15 of the Credit Reporting Privacy Code 2024
for the period 1 July 2024 – 30 June 2025

August 2025

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1. Introduction

1.1 Clause 23.15 of the Privacy (Credit Reporting) Code 2024 (“CR Code”) requires illion to publish on its website a report that includes the information specified in clause 23.15 (a) - (q) 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 2024 to 30 June 2025 and has been prepared in accordance with the requirements of clause 23.15 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 given access without charge</p>	<p>23.15 (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>2.25% 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.</p>
<p>% Individuals given access with a charge</p>	<p>23.15 (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.

% Correction requests received	<p>23.15 (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>0.0384% of individuals about whom credit information was held at the end of the reporting period submitted correction requests during the reporting period.</p>
% Successful corrections	<p>23.15 (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>50.14% 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>
Corrections finalisation period	<p>23.15 (e) Average (the mean) 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 12 days.</p>

% Other corrections made	<p>23.15 (f) % = OCR/ IND x 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 0.097%</p>																
Types of corrections made	<p>23.15 (g) The types of correction requests received and made during the reporting period are depicted below:</p> <table><tr><th>Enquiry</th><th>Account</th><th>Personal Information</th><th>Defaults</th><th>Public Record</th><th>Judgments</th><th>Personal Insolvency Information</th><th>SCI's</th></tr><tr><td>46.63%</td><td>17.76%</td><td>22.90%</td><td>9.05%</td><td>1.72%</td><td>1.41%</td><td>0.53%</td><td>0.00%</td></tr></table> <p>The industry sectors from which the information originated that was corrected includes Banking and Finance, Telecommunication, Utilities and Other.</p>	Enquiry	Account	Personal Information	Defaults	Public Record	Judgments	Personal Insolvency Information	SCI's	46.63%	17.76%	22.90%	9.05%	1.72%	1.41%	0.53%	0.00%
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5. Complaints

% Complaints received	<p>23.15 (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>0.0057% of individuals about whom credit information was held at the end of the reporting period submitted a complaint during the reporting period.</p>																		
Types of complaints	<p>23.15 (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="663 643 1263 1050"> <thead> <tr> <th>Types of Complaints</th><th>%</th></tr> </thead> <tbody> <tr> <td>Credit Report Information</td><td>73.18%</td></tr> <tr> <td>Credit Score</td><td>15.52%</td></tr> <tr> <td>Commercial Information</td><td>6.13%</td></tr> <tr> <td>Service</td><td>3.26%</td></tr> <tr> <td>Ban/Suppression</td><td>1.15%</td></tr> <tr> <td>Consumer Marketing</td><td>0.57%</td></tr> <tr> <td>Fees</td><td>0.19%</td></tr> <tr> <td>Total</td><td>100.00%</td></tr> </tbody> </table>	Types of Complaints	%	Credit Report Information	73.18%	Credit Score	15.52%	Commercial Information	6.13%	Service	3.26%	Ban/Suppression	1.15%	Consumer Marketing	0.57%	Fees	0.19%	Total	100.00%
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% Complaints finalised	<p>23.15 (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>0.0057% 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>																		

Complaint finalisation period – the average number of days taken to finalise a complaint	<p>23.15 (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 19 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 73 days.</p>														
Complaint outcomes	<p>23.15 (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="667 715 1283 1034"> <thead> <tr> <th>Complaint Outcome</th><th>%</th></tr> </thead> <tbody> <tr> <td>Explanation on information held</td><td>62.46%</td></tr> <tr> <td>Credit Information Updated</td><td>33.14%</td></tr> <tr> <td>Insufficient information</td><td>2.87%</td></tr> <tr> <td>Apology</td><td>0.96%</td></tr> <tr> <td>Goodwill</td><td>0.57%</td></tr> <tr> <td>Total</td><td>100.00%</td></tr> </tbody> </table>	Complaint Outcome	%	Explanation on information held	62.46%	Credit Information Updated	33.14%	Insufficient information	2.87%	Apology	0.96%	Goodwill	0.57%	Total	100.00%
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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>23.15 (m) % = $\text{SCI} / \text{IND} \times 100$</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%</p> <p>There are no SCI's recorded in illion's consumer credit data set.</p>
<p>% Serious credit infringements by sector</p>	<p>23.15 (n) % = $\text{SCI(S)} / \text{SCI} \times 100$</p> <p>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</p> <p>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</p> <p>There are no SCI's recorded in illion's consumer credit data set.</p>

7. Monitoring and Auditing Activities (23.14)

7.1 The Privacy Act and the Privacy (Credit Reporting) Code 2024 ('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 relating 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 well-developed framework to monitor the risk of CP's conformance with the CR code.

7.3.2 The framework considers many 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;
- (c) Volumes and frequency of correction requests either from the CP or individuals;
- (d) The volume, outcome and proportion of complaints received by illion and or third parties;
- (e) The timeframe and process required for the CP to confirm it has made corrections (where appropriate) to its credit-related personal information;
- (f) The results of any past reviews of the CP's compliance with its obligations under the CR Code.

7.3.3 illion has a data quality monitoring team monitors that is constantly monitoring and reviewing the data supplied by its subscribers to ensure this data is accurate, is in line with expectations and supplied in a timely fashion.

7.4 illion's conducted a number of reviews in this reporting period. These covered the financial services, utilities and telecommunications sectors.

Reviews conducted during this reporting period included:

- A review of a CP that had its licence removed and was to cease trading, this led to the removal of credit information provided by that CP that was no longer able to be validated.
- A review of two CPs that supplied information in a manner that was inconsistent with specific requirements, this caused the information to be recorded incorrectly. This was remedied by correcting the incorrect information for both CP's.
- 7 CP's who were reviewed on their updating of defaults, this led to the removal of those entries that were unable to be substantiated.
- A further review commenced in the reporting period is still under way with the outcome to be finalised in the next reporting period.

illion will continue to develop its monitoring activity to ensure it is effective in identifying risks and addressing any issues identified.

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.

% Disclosure to the CRB of consumer credit liability information	<p>23.11 (o) % = CCLI/ CP x 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 20.83%</p>
	<p>23.11 (p) % = RHI/ CP x 100</p>

% Disclosure to the CRB of repayment history information

RHI = the number of CPs that disclosed repayment history information to the CRB during the reporting period

CP = the total number of CPs that disclosed any credit information to the CRB during the reporting period

The percentage of CPs that disclosed RHI to illion was 18.45%

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