CREDIT REPORTING POLICY

This Credit Reporting Policy sets out how **NEUMANN STEEL PTY. LTD. (ACN 009 818 035)** including, but not limited to any related body corporate, any subsidiary or associated entity and as trustee of any trust from time to time (individually and together called "**Neumann Steel"**) (referred to as "we", "our", or "us" in this policy) manages the personal information we obtain from credit reporting bodies ("**CRBs**") and other types of credit-related personal information. We are committed to protecting your privacy and ensuring that we comply with the Privacy Act 1988, Australian Privacy Principles (APPs) and Privacy (Credit Reporting) Code 2025 (CR Code 2025), as amended from time to time.

This Credit Reporting Policy does not apply to the commercial credit we provide to companies. However, it will apply to an individual who applies to us for commercial credit and to other individuals we deal with in connection to the provision of commercial credit (such as directors and individual guarantors). If you are unsure whether this Credit Reporting Policy applies to you, please contact our Privacy Officer using the contact details set out below.

This Credit Reporting Policy should be read in conjunction with our privacy policy located on our website: neumannsteel.com.au/privacy-policy

We conduct regular reviews of our policies and procedures, and we may change our Credit Reporting Policy from time to time. The most current version of our Credit Reporting Policy will be available on our website. A copy of our Credit Reporting Policy is also available free of charge by contacting our Privacy Officer using the contact details set out below. We will take reasonable steps to provide a copy of our Credit Reporting Policy in the form requested.

1. WHAT TYPES OF CREDIT-RELATED INFORMATION DO WE COLLECT AND HOLD?

The types of information we collect and hold may include:

- Identification details, such as your name, address(es), telephone number(s), date of birth, driver's license number and current or last known employer
- Details of consumer and commercial credit you have applied for (including the type and amount of credit), where we have requested that information in connection with an application for credit and/or a guarantee
- Information about payment(s) of $150 or more which become more than 60 days overdue
- Information about new credit arrangements you may have made with a credit provider (such as variation of existing credit terms and conditions or the provision of new credit)
- Information about your current or terminated credit accounts (including the name of the credit provider, the date on which the credit was entered into and/or terminated, and the limit of the credit account)
- Advice that payments that were previously notified as unpaid are no longer overdue
- That we have made an information request about you to a CRB to assess a credit application and/or a guarantee
- That another credit provider, or a trade insurer, or a mortgage insurer, has made an information request about you to a CRB
- Information provided to us by a CRB, including information about you which assists us to assess your suitability for commercial credit or as a guarantor of commercial credit
- The type and amount of commercial credit we provide to you or that you have sought from us in a commercial credit application
- That you have offered to act as guarantor in relation to a commercial credit application made to us, or that you are acting as guarantor in relation to commercial credit provided by us
- That commercial credit we provided (to you, or an entity associated with you, or in your capacity as guarantor) has been paid or otherwise discharged
- Whether, in our opinion or the opinion of another credit provider, you have committed a serious credit infringement
- Publicly available information that relates to your activities in Australia and your creditworthiness

- Information about you on the National Personal Insolvency Index
- Information about court judgment(s) which relates to credit you have obtained or applied for

The Privacy Act 1988 has detailed definitions describing the types of information set out above. However, in this Credit Reporting Policy we collectively refer to these types of information as "credit-related information". We will only collect credit-related information about you by lawful and fair means and in accordance with the Privacy Act 1988, and CR Code 2025.

2. HOW DO WE COLLECT YOUR CREDIT-RELATED INFORMATION?

We may obtain credit-related information about you from:

- Equifax (formerly Veda), CreditorWatch, Experian, CreditProtect (the CRBs we may deal with at any one time)
- Information about your commercial creditworthiness from businesses that provide that type of information
- Information you provide to us, including the information contained in a completed application for commercial credit and/or guarantee (such as your name, date of birth, residential and/or business address, contact details, trade references, banking details, assets, income and financial position)
- Other credit providers (where you consent to us collecting that information or we are permitted to do so under the Privacy Act 1988)
- Information we collect in the course of our dealings with you in connection with credit, such as when you make payments to us

Where we outsource our functions to third party services providers, those providers may also collect credit-related information from you on our behalf.

3. WHY DO WE COLLECT, HOLD, USE AND DISCLOSE YOUR CREDIT-RELATED INFORMATION?

We may collect, hold, use, and disclose credit-related information about you that is reasonably necessary for our business purposes and as permitted by law. Those purposes may include:

- Verifying your identity
- Assessing an application made to us for commercial credit (by you or an entity associated with you)
- Assessing whether we will continue to provide commercial credit (to you or an entity associated with you)
- Assessing your suitability as a guarantor where you have offered to provide us with a guarantee in relation to an application for commercial credit, or in relation to commercial credit already provided by us
- Deriving scores, ratings, summaries and evaluations relating to your credit-worthiness which are used in our decision-making processes
- Assisting you to avoid defaulting on your credit-related obligations to us
- Managing the credit we provide and our relationship with you
- Undertaking debt recovery and enforcement activities (including in relation to guarantors)
- Disclosing your credit-related information to a guarantor, or someone you have indicated is a prospective guarantor, in relation to an application for commercial credit or in relation to commercial credit already provided by us
- Disclosing your credit-related information to our related bodies corporate that are also considering whether to provide credit (to you or an entity associated with you and/or in your capacity as guarantor)
- Disclosing your credit-related information for our internal management purposes
- Disclosing your credit-related information to other third parties that provide services to us (including debt collectors, lawyers, and advisers)

- Dealing with any complaints, or access or correction requests you make to us
- Responding to a consultation request made to us by a CRB or another credit provider
- Conducting fraud assessments and dealing with serious credit infringements
- Exchanging information (including default information) with other credit providers, as permitted by the Privacy Act 1988 and CR Code 2025
- Participating in the credit reporting system and exchanging information with CRBs as permitted by Part IIIA of the Privacy Act 1988 and CR Code 2025
- Satisfying legal and regulatory requirements
- Where you otherwise expressly consent to our collection, use and/or disclosure of your credit-related information

Some credit-related information may only be used or disclosed under the Privacy Act 1988 for some of these purposes, or in some of those circumstances. We are not likely to disclose your credit-related information to recipients located outside of Australia.

We may refuse an application for commercial credit and/or reject a guarantee based wholly or partly on your credit-related information.

4. DISCLOSING CREDIT-RELATED INFORMATION TO CRBS

We may disclose your credit-related information to a CRB for the purposes set out above and where the Privacy Act 1988 permits us to do so. The types of information we may disclose to a CRB include:

That you have applied for credit with us (including the amount of credit) and/or that we are a current provider of credit to you

- That you have guaranteed credit to us (including the amount of credit guaranteed)
- That you have failed to meet your payment obligations to us (including the amount of an outstanding debt)
- Advice that payments that were previously notified as unpaid are no longer overdue
- That credit we provided to you has been paid or otherwise discharged
- That a guarantee you provided to us has been satisfied or otherwise discharged
- In some circumstances, that in our opinion you have committed a serious credit infringement

CRBs may include that information in reports provided to credit providers like us to assist them in assessing your creditworthiness.

Under the Privacy Act 1988, CRBs are permitted to use credit reporting information to assist credit providers who wish to direct market to you by ensuring you meet certain criteria. This is known as “pre-screening”. You have a right to contact a CRB and request (at no cost to you) that a CRB does not use your information for this purpose.

You also have a right to request that a CRB not use or disclose your credit-related information if you reasonably believe that you have been, or are likely to be, a victim of fraud (including identity fraud).

You can contact the CRBs we exchange information with using the details below:

Equifax

Online: https://www.equifax.com.au/contact
Phone: 13 8332
Mail: Equifax

PO Box 964
NORTH SYDNEY NSW 2059

You may obtain a copy of Equifax's policy about their management of credit-related information by contacting them or visiting their website

CreditorWatch

Online: https://creditorwatch.com.au/contact-us
Phone: 1300 50 13 12
Mail: GPO Box 276
Sydney NSW 2001

You may obtain a copy of CreditorWatch's policy about their management of credit-related information by contacting them or visiting their website.

Experian

Online: https://www.experian.com.au/contact-us
Phone: 1300 783 684
Mail: Experian Consumer Operations
PO BOX 7405 St Kilda Road
Melbourne VIC 3004
Email: creditreports@au.experian.com

You may obtain a copy of Experian's policy about their management of credit-related information by contacting them or visiting their website.

CreditProtect

Online: https://www.creditprotect.com.au/contact/
Phone: 1300 702 929
Mail: Level 8
171 Clarence Street
Sydney NSW 2000

You may obtain a copy of CreditProtect's policy about their management of credit-related information by contacting them or visiting their website.

5. EXCHANGE OF CREDIT-RELATED INFORMATION WITH TRADE INSURERS

In connection to an application for commercial credit, trade insurers may also obtain credit-related information about you from us or a CRB for the purpose of assessing whether to provide insurance to us in relation to the commercial credit we provide you (including assessment of the risk of insuring us, the risk of default by you and/or you in your capacity as a guarantor).

6. USE OF THIRD-PARTY SERVICE PROVIDERS

We will disclose your credit-related information when we outsource certain functions to third-party service providers. The functions we may outsource include:

- Managing the supply of our products and services
- Establishing credit accounts and managing credit provided to our customers
- Assessing credit applications and/or guarantees
- Responding to enquiries about applications, accounts and our products and services
- Conducting checks for creditworthiness and/or fraud
- Debt collection

Where we disclose your credit-related information to our third-party service providers, we require those providers to comply with the Privacy Act 1988 and CR Code 2025. Our third-party service providers will not collect, use or disclose your personal information for any purpose other than our own, as set out in this Privacy Policy.

7. HOW DO WE STORE AND PROTECT YOUR CREDIT-RELATED INFORMATION?

We store credit-related information in both paper-based records and in electronic form (such as on computer servers) on our systems or the systems of our service providers. We take all reasonable precautions to safeguard your information from misuse, interference and loss and unauthorised access, modification or disclosure, including:

- Restricting access to credit-related information stored in our electronic and paper-based records
- We implement administrative, technical and physical safeguards including access controls, encryption, authentication controls, secure system monitoring, staff training and third-party security requirements proportionate to the sensitivity of the information held
- Training, policies and procedures in relation to the use of our computers and management of credit-related personal information (including informing and training our employees who handle credit-related information of the requirements of the Privacy Act 1988, CR Code 2025, and APP's)
- Requiring all of our third-party service providers to handle personal information in accordance with the Privacy Act 1988, CR Code 2025 and APP's

We will securely destroy or permanently de-identify credit-related information when it is no longer required for any lawful business purpose or legal retention requirement, in accordance with the Privacy Act 1988, Australian Privacy Principals and the Privacy (Credit Reporting) Code 2025.

The internet is not a secure method of transmitting information. Other than where we use Secure Socket Layer ("SSL") technology (such as for the transmission of credit card information), to the maximum extent permitted by law we cannot and do not accept responsibility for the security of information you send to or receive from us over the internet, or the unauthorised access or use of that information.

8. HOW CAN YOU ACCESS YOUR CREDIT-RELATED INFORMATION?

We take all reasonable steps to ensure that the credit-related information we collect, use, and disclose is accurate, up-to-date, complete, relevant and is not misleading. If your personal details change at any time, please contact our Privacy Officer.

Under the Privacy Act 1988 you have a right to access the credit-related information we hold about you, subject to some exceptions allowed by law. Factors affecting your right to access include:

- Giving access would be unlawful
- Denying access is required or authorised by law
- Giving access would be likely to prejudice an enforcement activity

If you would like access to your credit-related information, please contact our Privacy Officer using the contact details set out below. To ensure that you have access to the most up-to-date information you should additionally request access to credit-related information held by CRBs about you.

We will usually respond to requests for access to credit-related information within 30 days of receiving the request. If we refuse your request, we will give you a written notice setting out the reasons for our refusal (except to the extent it would be unreasonable to do so) and the mechanisms available to you to complain about that refusal.

There is no charge for an access request, although we may charge you a reasonable fee for retrieving your information. We will inform you of any fee and obtain your agreement to that fee before the information is provided to you.

9. HOW CAN YOU REQUEST CORRECTION OF YOUR CREDIT-RELATED INFORMATION?

We take all reasonable steps to ensure that the credit-related information we collect is accurate, up-to-date, complete, relevant and is not misleading. However, if you believe that is not the case you have a right under the Privacy Act 1988 to request that we correct your credit-related personal information.

Where you notify us that you may be a victim of identity theft, fraud or suspected fraud, we will take reasonable steps to investigate the matter and assist in correcting inaccurate credit reporting information in accordance with the Privacy Act 1988 and the Privacy (Credit Reporting) Code 2025.

If you would like to do so, please contact our Privacy Officer using the contact details set out below.

If we are satisfied that your credit-related information is incomplete, inaccurate, out-of-date, irrelevant, or misleading we will take reasonable steps to correct that information within 30 days of your request, or within such longer period as you agree to in writing. Where it is necessary to resolve a correction request, we must consult with a CRB or another credit provider who holds or held that information.

We will notify you of our decision about a correction request within 5 business days of reaching that decision.

If we refuse your request, we will give you a written notice stating:

- That the corrections have not been made
- Our reasons for not correcting the information (including evidence substantiating the correctness of the information)
- How you can make a complaint to the Office of the Australian Information Commissioner (“OAIC”)

There is no cost involved for you to make a correction request or for the correction of your information.

10. HOW CAN YOU MAKE A PRIVACY OR CREDIT REPORTING COMPLAINT

If you believe we have breached the Privacy Act 1988, the Australian Privacy Principles (APP’s) or the Privacy (Credit Reporting) Code 2025, you may submit a complaint to our Privacy Officer. We will acknowledge your complaint promptly and aim to respond within 30 days.

If you are dissatisfied with our response, you may refer your complaint to:

Office of the Australian Information Commissioner (OAIC)

Website: www.oaic.gov.au
Phone: 1300 363 992
Email: enquiries@oaic.gov.au

11. PRIVACY OFFICER

Title: Privacy Officer
Email: privacy@neumann.com.au
Mail: 13 Nuban Street
Currumbin QLD 4223