

CENTRIX GROUP LIMITED

**ASSURANCE REPORT TO
THE PRIVACY COMMISSIONER**

**FOR THE PERIOD
1 JULY 2021 TO 30 JUNE 2022**

**In accordance with Clause 8 and Schedule 7 of the
Credit Reporting Privacy Code 2020**

1 Purpose of Assurance Report

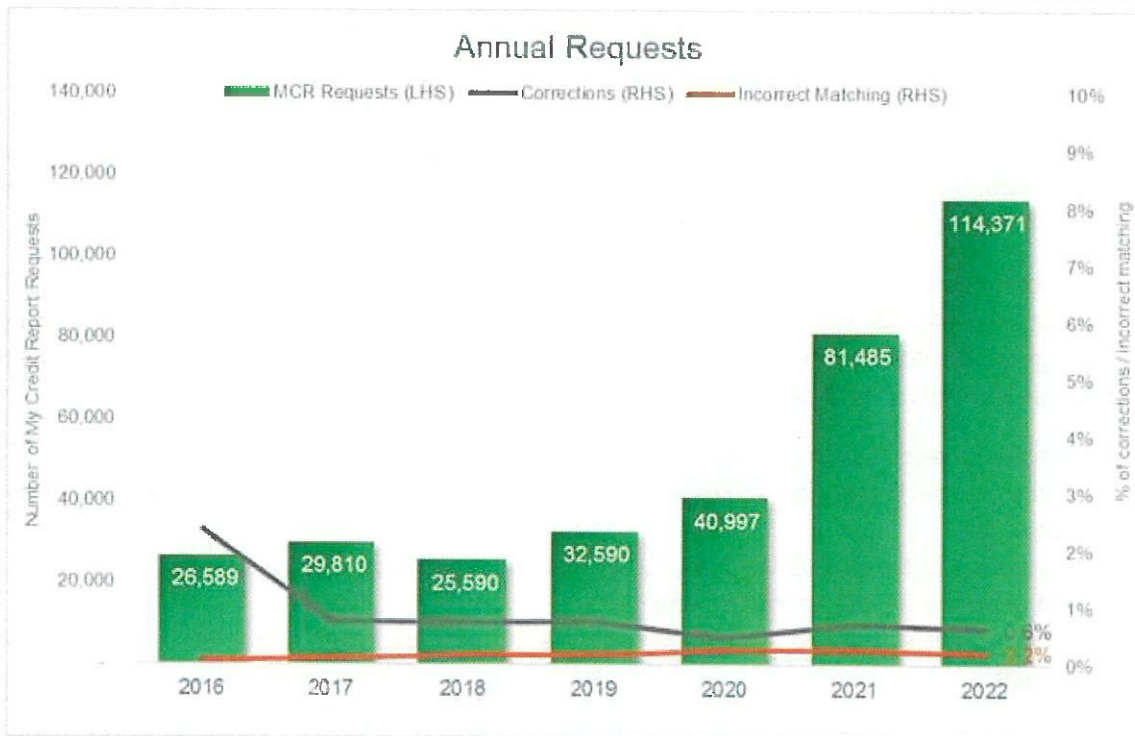
Centrix Group Limited (“Centrix”) is a credit reporter for the purposes of the Credit Reporting Privacy Code 2020 (“Code”). This report is provided to the Privacy Commissioner as required by Clause 8 of the Code. This Assurance Report has been prepared by a review committee (“Review Committee”) established by Centrix for the purpose of preparing this report for the period 1 July 2021 to 30 June 2022 (“Period”).

Centrix has always focused on ensuring that its products and processes comply with both the word and the spirit of the Code, and that they provide benefit to subscribers, consumers and the community. We value the assurance reporting process and see it as an important opportunity to show subscribers and consumers that they can trust Centrix. To that end, during the Period, Centrix took the initiative to display its annual Assurance Reports on its public website making them available to any interested parties. Centrix believes this provides a greater level of transparency to individuals and subscribers and will post each annual Assurance Report going forward.

2 Highlights

With Centrix being based in Auckland, this resulted in staff having to work from home for extended periods and Centrix is pleased to report this had no impact on service levels to individuals and subscribers who interact on a daily basis. As the result of a higher awareness of the value of an accurate credit report, Centrix received a record number of requests from individuals seeking access to their own credit report at more than 300 every day with more than 95% of them being despatched on the same day of request. To cater for this increase in requests, Centrix made several changes to the application and despatch processes to facilitate ease of use and efficiencies.

While the past two years has seen significant growth in the numbers of individuals requesting access to their own credit report, the graph below shows the proportion of requests for correction and incidents of incorrect matching has remained reasonably static over the past few years. This reflects an ongoing focus on data accuracy and data integrity.



During the Period, Centrix also introduced an on-line automated request for the initial suppression of credit information where the individual believes they may have been a victim of fraud. Although daily transaction numbers are low, this new service facilitates the efficient processing of suppressions and ensures they are actioned on the same day of the initial request as per the requirements of Schedule 8.

3 Review Committee

3.1 Members of the Review Committee

Keith McLaughlin (Chairman), Managing Director, Centrix Group Ltd
 Bill Coleman, Operations and Compliance Manager, Centrix Group Ltd
 Daimhin Warner, independent person

3.2 Independent Person

In accordance with clause 8(3)(c) of the Code, the statement from the independent person, Daimhin Warner, is provided as Schedule 1, including his expertise in relation to matters of compliance with the Code.

Mr Warner is not (and has never been) an employee, director, or owner of Centrix.

Mr Warner is independent of the matters that are required to be reviewed in this process. He has never been involved in the establishment, implementation or monitoring of Centrix's Code compliance programme. Other than being the independent person on the Review Committee, Mr Warner does not provide (and has never provided) any services to Centrix.

4 Summary of review process and method followed by Review Committee

4.1 *Role of the Credit Reporting Privacy Code Compliance Committee*

In order to provide a summary of the review process and method followed by the Review Committee, the role of Centrix Credit Reporting Code Compliance Committee (“Compliance Committee”) needs to be explained.

The Compliance Committee is a permanent Committee established by Centrix to oversee Centrix’ compliance with the Code. The Compliance Committee is comprised of the Managing Director, the Operations and Compliance Manager, and the Administration and Support Manager. The Administration and Support Manager’s duties include:

- a) Receiving and responding to requests by individuals for access to their credit file;
- b) Receiving and responding to requests by individuals for correction of information on their credit file;
- c) Receiving and responding to any Code complaints (on the advice of management)
- d) On boarding new subscribers; and
- e) Sending the scheduled monitoring requests to the subscribers and following up on any issues.

The Committee undertakes a number of Code compliance tasks. Some of these tasks include:

- a) Sets all policies, procedures and forms that are required by the Code.
- b) Sets the scheduled Code monitoring activities to be undertaken (for example, type of monitoring, frequency and number of subscribers/enquiries).
- c) Reviews the policies and procedures formally at least annually and also where an event occurs that requires a review.
- d) Reviews all the results of the scheduled Code compliance monitoring undertaken and any action taken as a result of the monitoring and decides whether the action taken is appropriate in terms of Code compliance.
- e) Reviews the Code Compliance Report (see below for more details on the Code Compliance Report).
- f) Reviews any Code complaints received.
- g) Reviews a summary of the Corrections Register.
- h) If appropriate as a result of the reviews undertaken in d) to g) above, sets any additional action to be taken in relation to that matter and/or an amendment to the relevant policy or procedure and follows up to ensure completed.
- i) Sets the staff training programme and monitors this.
- j) Sets the general Code compliance schedule (for example, general compliance communications to subscribers).
- k) Considers the staff access privileges to the consumer Bureau.

This Committee meets regularly to review Code compliance matters.

4.2 *Code Compliance Report*

A Code Compliance Report was prepared prior to each meeting for the Period. Each report included the following:

- a) The scheduled monitoring undertaken and the outcome of the monitoring;
- b) Details of any Code complaints received;
- c) Details of any incorrect matching;
- d) Details of any actions taken in relation to Code matters.

4.3 *Compliance Committee meetings*

The Compliance Committee met four times during the Period. The Committee received a Compliance Report for each meeting (along with all supporting documentation evidencing the monitoring) and any other relevant papers that had been prepared. The report was considered and discussed at a meeting of the Committee. Minutes of every Compliance Committee meeting were taken.

All Compliance Committee agendas, meeting minutes, Compliance Reports and all papers presented to the Committee for the relevant period were reviewed as part of the process for the Assurance Report.

4.4 *Process and framework for the Assurance Report*

A process and framework was prepared that noted each assurance sought and in relation to each assurance detailed:

- a) The reviews to be undertaken;
- b) The personnel involved in the reviews;
- c) The reviews that would be undertaken by Mr Warner independently from the other Committee members;
- d) All the documentation to be reviewed.

This was a fluid document. As the reviews proceeded, additional information was sought and at times this led to other matters needing to be reviewed. The Review Committee considered it was important that during the process the scope of the reviews and the information to be considered could be widened so that all relevant matters were reviewed in the preparation of this report.

A summary of what was reviewed is set out Schedule 2. Mr Warner independently reviewed all this information.

Mr Warner had access to any staff member and all information he considered was necessary to complete his reviews.

Mr Warner either interviewed or communicated with the following people during the process: Keith McLaughlin, Bill Coleman, the Administration and Support Manager, and the IT Operations Manager.

5. Reasonable Assurances

Having completed the review, Centrix provides the following reasonable assurances for the period 1 June 2021 to 30 June 2022.

Reasonable Assurance Centrix had policies in place that give effect to the requirements of the Code
CI 2(a)

Centrix has a number of policies designed specifically to give effect to the requirements of the Code, as well as some general employment policies that are also relevant to Code compliance. These policies are reviewed on a regular basis including an annual formal review – for example, when there are amendments to the Code or an amendment is required due to operational matters or a strategic decision.

Centrix maintains a Staff Policies Handbook incorporating all Code and Legislative policies, General Employment policies and a General section covering breaches of policies, training and ongoing reviews of policies.

Based on a review of the Code and the policies in place, the Review Committee gives this assurance.

Reasonable Assurance Centrix had policies in place to ensure that any arrangements with a related company accords with clause 4(2) of the Code
CI 2(b)

Centrix has not entered into any such arrangement with a related company. On this basis, this reasonable assurance does not apply for the Period.

Reasonable Assurance Centrix had internal procedures and controls in place to give effect to the policies and requirements of the Code.
CI 2(c)

Centrix had a number of internal procedures and controls in place during the Period to give effect to the policies and requirements of the Code. Some examples are:

- a) The subscriber sign up process. Only certain roles in the organisation have the authority to give a subscriber access and a number of steps must be completed before a subscriber is given access to the bureau.
- b) Providing individuals access to their credit information. Only certain roles in the organisation have the authority to provide access. There is a clear stepped process that is followed before access to credit information is given.
- c) Staff access rights and changes rights to credit information are based on the duties undertaken by the staff, and were reviewed during the Period.
- d) The formal compliance monitoring procedures.

All staff are required to comply with the policies, procedures and controls (as part of their employment/contractor agreement) and annual training was completed.

Based on a review of the policies, internal procedures and controls, the Review Committee gives this assurance.

Reasonable Assurance Centrix had appropriate procedures in place to ensure that any information requested under rule 6 is received only by the individual or their duly authorised agent
CI 2(d)

Centrix enters into agreements with designated organisations to provide for them to act as the agent of the individual to obtain specific credit information. The agreements contain explicit provisions to limit the use of the individual's credit information by the agent to ensure access is in accordance with Rule 6 and that credit information cannot be used for any marketing purposes.

Centrix also has procedures in place for managing rule 6 requests from individuals, primarily via the online My Credit Report process. These procedures include robust identify verification controls and guidance to individuals to ensure that they are comfortable with the delivery method used for their information. Further, we password protect credit files released to individuals to ensure they can be accessed only by the individual concerned.

Based on a review of the Code and the policies in place, the Review Committee gives this assurance.

Reasonable Assurance Centrix provided information and training to its staff to ensure compliance with the policies, procedures and controls.
CI 2(e)

Refresher training on the Code policies, procedures and controls was undertaken during the Period including all updates to the Staff Policies Handbook.

Any new staff were inducted on the Code policies, procedures and controls before they undertook any relevant Code duties.

All staff are made aware that Centrix handles sensitive personal information and of the potential repercussions (both to the person whose personal information Centrix holds and the staff member) if the policies, procedures and controls are not met.

Based on this and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Centrix ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information.
CI 2(f)

Centrix' standard subscriber agreements contained Schedule 3 obligations. The subscriber agreement is entered into by the subscriber by either signing the agreement or if using the on-line process, by confirming they agree to the terms and conditions.

All the signed subscriber agreements selected as part of the review contained Schedule 3 obligations. The internal processes require the subscriber to agree to the terms and conditions of the subscriber agreement before a subscriber is given access to credit information.

The majority of subscribers sign up on-line. The on-line sign up process requires the subscriber to scroll through the subscriber agreement and tick a box confirming they agree to the terms and conditions. An applicant cannot move to the next step in the on-line sign up process if the box is not ticked.

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Centrix ensured that access agreements under Schedule 4 were in place before disclosing credit information
CI 2(g)

Centrix currently has not entered into any Access Agreement with an intelligence or security agency to date. On this basis, this reasonable assurance does not apply for the Period.

Reasonable Assurance Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix followed its own policies, procedures and controls.
CI 3(a)

Regular scheduled monitoring for Code compliance and Centrix policies, procedures and controls was undertaken during the Period. This was documented and reviewed by the Compliance Committee.

See also Reasonable Assurances CI 2(f), 2(g), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l), 3(m).

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that the information held by Centrix was protected by reasonable security safeguards.
CI 3(b)

Centrix has security policies and procedures in place to ensure the credit information it holds is protected by reasonable security safeguards. Access to credit information is restricted and monitored. Compliance with the policies and procedures are monitored and reviewed by the Compliance Committee.

During the Period Centrix continued with an ongoing agreement with an independent third party to provide professional IT security services, including annual security testing, ongoing security monitoring, and a Virtual Security Officer service to support and bolster our internal staff and processes.

Based on the monitoring undertaken by Centrix and the IT security company during the Period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed information privacy requests in accordance with rules 6 and 7.

Each quarter, monitoring for compliance with Rule 6 (access to credit information) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

All requests for correction of information are recorded on a Register. Each quarter, monitoring for compliance with Rule 7 (correction requests) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

The majority of requests for correction of credit information either related to credit account or default information and in the majority of cases, after Centrix had completed its investigation, the information was corrected in accordance with the request.

Based on the monitoring undertaken by Centrix during the Period for compliance with Rules 6 and 7 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix took such measures as were reasonably practicable to avoid the incorrect matching of information held by Centrix.

Centrix has detailed processes and business rules for matching credit information. These are all automated and have been in place for many years.

Centrix considers people are the best “auditors” of their own information and during the Period, on average, Centrix received more than 300 access requests a day.

At the end of year, the Compliance Committee reviewed the Registers recording correction requests, incorrect matching, any complaints and any other issues raised for the purpose of identifying any matter that may have arisen from incorrect matching.

The most common instances of incorrect matching being:

- individuals having the same name and DOB living in the same area
- individuals having similar names and same DOB (e.g. twins)
- individuals having same names and very similar DOB; and
- individuals having similar or same names, same address and one party not having a DOB (e.g. father and son).

Based on the very small number of known instances of incorrect matching, the monitoring undertaken by Centrix during the Period for compliance with this requirement, the system enhancement implemented during the Period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(e) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that the information held by Centrix was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading.

Subscribers are required by contract to ensure that the credit information they share with Centrix is accurate, up to date etc., and to update any information they have previously shared (such as credit defaults). Further to this, subscribers are required to cooperate with Centrix in relation to investigations into disputes or correction requests. The combination of obligations on subscribers and the requirement for Centrix to properly investigate disputes and correction requests constitute reasonable steps in terms of rule 8.

Scheduled quarterly, subscriber monitoring checks the accuracy of credit information provided by subscribers that are monitored. Further, the Compliance Committee reviews all correction requests and the outcome of those requests.

Based on the low level of corrections made to information during the Period, the monitoring undertaken by Centrix during the Period for compliance with this requirement, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(f) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix' reporting and retention of credit information was in accordance with rule 9 and Schedule 1

Centrix has automated processes in place that result in:

1. Credit information no longer being reported once the maximum reporting period has been reached;
2. Credit information being deleted before it reaches the maximum retention period.

In addition to this, as part of their daily BAU activities, our Helpdesk reviews credit reports and that includes a review of the reporting and deletion periods as they relate to the information on the credit report. Further, we monitor for complaints and correction requests relating to credit information being reported or retained outside the maximum periods, and received none for the Period.

Based on the automated processes Centrix has in place, the BAU checks undertaken by Centrix during the Period, and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(g) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed direct marketing lists in accordance with Schedule 10.

Centrix has documented policies and procedures in accordance with the requirements of Schedule 10. However, during the Period, Centrix did not process any direct marketing lists. On this basis, this reasonable assurance does not apply for the Period.

Reasonable Assurance CI 3(h) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed suppression, release or cancellation requests in accordance with Schedule 8.

Each quarter, monitoring for compliance with Schedule 8 (suppression process) takes place and the outcome of the monitoring is reviewed by the Compliance Committee.

During the reporting period there were 784 applications for initial requests, 107 extensions, 23 releases and 4 cancellations.

In order to streamline initial requests, Centrix implemented an automated on-line application via its public website where individuals could request an initial suppression of their credit file which would pass the request to the other two credit reporters (if selected), match to the individuals credit file, freeze the credit file for 20 working days, generate a PIN and return an acknowledgment including details for additional options the individual can take as per Schedule 8.

This process facilitates the efficient processing of suppression requests and ensures they are actioned on the same day of the initial request.

Based on the monitoring undertaken by Centrix during the Period for compliance with Schedule 8 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(i) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix processed complaints in accordance with Clause 7.

Centrix manages any complaints received in accordance with clause 7 by the same process as requests for corrections received in accordance with Rule 7 to maintain consistency in the initial acknowledgement, tracking, investigative and resolution stages. Complaints are overseen by the Operations and Compliance Manager as the designated person to deal with them. During the period there were no complaints escalated to the Office of the Privacy Commissioner indicating they were resolved satisfactorily by Centrix.

Based on the monitoring undertaken by Centrix during the Period for compliance with Clause 7 and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 3(j) Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that Centrix' website displayed accurate information that gave effect to rules 6(7)(b), 7(5)(b) clause 7(4) and clause 8.1 of Schedule 8.

Centrix has put significant effort into meeting consumer transparency requirements, enabling consumers to understand the credit reporting process and making it easy for them to exercise important rights, such as access, correction and credit suppression. This includes providing a

dedicated consumer landing page – [My Credit Report](#) – which contains the summary of rights, FAQs, guidance on credit reporting and credit scores (much of which has been translated into several languages), and clear automated rights processes. We regularly review and update this information.

Based on the review undertaken for this assurance, the Review Committee gives this assurance.

Reasonable Assurance Centrix undertook monitoring activities to ensure reasonable compliance with the Code, including that subscribers complied with CI 3(k) agreements and controls.

Every quarter, scheduled monitoring took place of randomly selected subscribers to check subscribers' compliance with the Schedule 3 Code obligations and controls. The outcome of the monitoring and any actions taken were reviewed by the Compliance Committee. Centrix also checks subscriber compliance as part of usual business operations (for example, a business may make an enquiry about Centrix' credit reports and the issue of whether the business has the appropriate consents in place is considered).

Based on the monitoring undertaken by Centrix during the Period for subscribers' compliance and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance Centrix undertook monitoring activities to ensure intelligence and security agencies complied with any access agreements and controls. CI 3(l)

Centrix currently has not entered into any Access Agreement with an intelligence or security agency to date. On this basis, this reasonable assurance does not apply for the Period.

Reasonable Assurance Centrix ensured the requirements under Schedule 11 in relation to tracing individuals were met. CI 3(m)

Centrix has documented policies and procedures in accordance with the requirements of Schedule 11.

Based on the monitoring undertaken by Centrix during the Period for compliance with this requirement and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 4(a) Where during Centrix systematic reviews, monitoring activities or as a result of a complaint, Centrix identified a breach of an agreement, policy, procedure, control or requirement of the Code, Centrix investigated that breach, and where appropriate, took prompt remedial action.

At its regular meetings, the Compliance Committee considers any identified breaches of agreements, policy, procedure, control or requirement of the Code, and the investigation undertaken and any actions taken including the review and updating the appropriate policy and providing training to staff.

Based on the investigations and actions undertaken during the Period and the review undertaken for this Assurance Report, the Review Committee gives this assurance.

Reasonable Assurance CI 4(b) Where a deficiency was identified in the previous year's report, Centrix, where appropriate, took prompt remedial action.

Not applicable.

6. Additional Information Sought From the Privacy Commissioner

Mandatory privacy breach notifications

There were low volumes of privacy breach notifications and privacy complaints made to the Office of the Privacy Commissioner during the 2021-2022 financial year. What policies and procedures or self-assessment tool do you have in place to assure the Commissioner of complaints made to your agency (or near-misses identified by your agency) are being correctly triaged? How can the Commissioner be satisfied our Office is being advised of breaches that should be brought to our attention?

Centrix has a comprehensive Data Breach Response Plan in place to ensure that privacy breaches are managed in accordance with the mandatory breach reporting regime introduced by Privacy Act 2020. The Data Breach Response Plan includes procedures for determining whether a breach is notifiable, and for ensuring that the Privacy Commissioner, affected individuals and also affected subscribers (such as credit providers) are notified. We also include content about privacy breaches, and who such breaches must be reported to, as part of our staff training.

Centrix uses the Office of the Privacy Commissioner's Notify Us tool, at <https://www.privacy.org.nz/responsibilities/privacy-breaches/notify-us/evaluate>, to ascertain if a privacy breach – which we may have become aware of as a result of a complaint, or on the basis of our ongoing security and other monitoring activities – reaches the notification threshold. For the Period, Centrix has not become aware of any privacy breaches that reach the notification threshold. However, we can provide an assurance that we have taken reasonable steps to ensure our staff could recognise a breach and developed appropriate procedures to ensure such breaches are managed in accordance with the Privacy Act.

Transferring of information to other business channels within the agency

Credit reporting agencies have a variety of business functions. What assurances and measures are put in place to ensure personal information is shared within the appropriate business channel and to only shared to third parties for a lawful purpose and kept secure?

Centrix does not operate any other business channel other than that of a credit reporting agency as defined in the Credit Reporting Privacy Code 2020.

The use of credit reporting agency databases (or third-party agencies) to obtain personal information

Landlords can search prospective tenants on a third-party or credit reporting agency owned database. In the case of landlords using a credit reporting agency owned database (or via a third-party agency) how long is that pooled personal information retained for by the agency, and how is this explained to tenants so they know they have the right to access and change their information if need be? How is that information protected and only the correct people get to view it?

Any personal information provided by a landlord in relation to a pre-tenancy credit check is retained by Centrix in accordance with Schedule 1 of the Credit Reporting Privacy Code 2020. Where the pre-tenancy credit check is undertaken via a third party agency Centrix expects the

third party to retain, secure, use, disclose and allow individual's access in accordance with the Privacy Act 2020 for all disclosed credit information.

Tracing individuals for unclaimed monies

The Office of the Privacy Commissioner wishes to ensure all credit reporting agencies are following Schedule 11 of the Code correctly. While the Office acknowledges this question was asked in the 2019 assurance year, at that stage this provision was very new and it had not yet been used. Now three years later we wish to seek assurances around how agencies are using the credit reporting system for tracing to facilitate the return of money owed to individuals. Have you experienced any system issues or concerns from individuals and if so, please provide information around this and what is being done to mitigate these issues?

Since the introduction of tracing individuals for the return of unclaimed monies in 2019, Centrix has only provided this service once due to the limitations of Condition 5 in Schedule 11. As a credit reporting agency, Centrix is not set up to send out bulk notices on behalf of the subscriber and believes many individuals would view such a communication if they did receive one with suspicion and treat it as spam or a hoax.

Centrix maintains that the disclosure of new or more recent addresses back to the subscriber is of no greater risk than providing the same information in a credit report or where the subscriber is tracing the individual for any other purpose such as debt collection. The disclosure of such information would be recorded in the access log and the individual would be entitled to raise any concerns if they believed access was not for a legitimate purpose. To date Centrix has not received any complaints from individuals in relation to these tracing provisions.

Dated 19 September 2022



Keith McLaughlin
Managing Director and
Chairman Review Committee

Schedule 1

Daimhin Warner Statement

I, Daimhin Warner, am a Principal and Director of Simply Privacy Ltd, one of NZ's leading privacy consultancies, providing privacy advice, strategy and training to business and government, in NZ and around the world. I am also NZ Country Leader for the International Association of Privacy Professionals. I hold an LLB, an LLM (Hons) in Public Law, and am a Certified Information Privacy Professional/Europe.

For the purposes of clause 8 of the Credit Reporting Privacy Code (Code), I have extensive experience in relation to matters of compliance with the Code, and in relation to privacy compliance more generally. I am not (and never have been) an employee, director, or owner of Centrix, and I do not provide any other services to Centrix.

Between 2007 and 2014, I worked with the Office of the Privacy Commissioner, advising and assisting two Privacy Commissioners on complaints, inquiries, regulatory, policy and strategic matters. From April 2012, I was the Auckland Team Manager, Investigations and Dispute Resolution, leading a team of investigators responsible for investigating and resolving complaints made under the Privacy Act. In this role, I was responsible for the investigation and resolution of many complaints about credit reporters, relating to compliance with many of the assurance reporting focus areas.

While at the Office of the Privacy Commissioner, I was the Senior Policy Advisor responsible for running the major Code amendment process which, among other things, introduced comprehensive credit reporting and the assurance reporting regime. In this role, I drafted the amendments, including the assurance reporting provisions, and was initially responsible for managing the assurance reporting programme of work, including receiving and considering the reports, making the reports public and setting specific questions or topics of interest for the following assurance reporting period.

In 2014, I moved to Sovereign Assurance (now AIA), one of NZ's largest life insurers, to create and head a privacy team and programme of work, before co-founding Simply Privacy in 2015. My roles at Sovereign Assurance and later with Simply Privacy have given me extensive experience in conducting privacy compliance assessments across projects, processes and entire agencies. We are often required to deliver in-depth privacy gap assessments across the full breadth of a client's functions, processes and data assets. These are critical and robust reviews of agency privacy practices, resulting in firm and honest findings and pragmatic recommendations.

This is the first year that I have been the independent person for Centrix. I have not provided independent person services to any other credit reporter. My involvement in the 2022 assurance reporting process included a review of all relevant policies, procedures, controls and agreements Centrix has in place, a review of all evidence presented by Centrix in support of its assurances (including the results of monitoring and auditing activities), a review of Compliance Committee minutes and associated reports and documentation for the relevant period, a review of Centrix's website, meetings with all members of Centrix's Compliance Committee and other Centrix employees as required, and attendance at one Compliance Committee meeting.

Dated xx September 2022



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Daimhin Warner
Principal and Director
Simply Privacy Ltd

Schedule 2

Summary of Information Reviewed

Information	Assurances
The Code policies Centrix has in place as required by the Code. This included Mr Warner working through the Staff Policies Handbook and considering the internal procedures and controls required to give effect to the Code policy and requirements.	CI 2(a)
The internal procedures and controls Centrix has in place to give effect to the Code (for example bureau access and change rights, password controls and access log procedures).	CI 2(c)
Agency Access agreements in place during the period under review.	CI 2 (d)
The Code information, policies and the training undertaken by staff during the period under review and the staff acknowledgement forms.	CI 2(e)
The standard subscriber agreements in place during the period under review.	CI 2(f)
The subscriber on-line sign up processes.	CI 2(a), 2(c), 2(f)
Application for Get My Credit Report (request for access to credit information) and request for correction of information and reviewed the process that was followed.	CI 2(a), 2(c), 2(d)
Application for suppression request and reviewed the process that was followed.	CI 2(a), 2(c), 3(h)
Information security policies, procedures and reports.	CI 2(a), 2(c)
Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), 2(c), 3(d), 3(e), 3(i)
Centrix' website.	CI 3(j)
Compliance monitoring procedures.	CI 2(a), 2(c) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l), 3(m)
Scheduled monitoring undertaken during the period.	CI 2(a), 2(b) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l), 3(m)
All Compliance Committee papers, meeting minutes, Compliance Reports, Correction Requests Register, Incorrect Matching Register, Code Complaint's correspondence.	CI 2(a), 2(c) CI 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), 3(h), 3(i), 3(j), 3(k), 3(l), 3(m)