Trade Credit Collections Pty Ltd (TCC)

Privacy Policy

1 September 2026

This Privacy Policy sets out what personal information Trade Credit Collections Pty Ltd ("**TCC**", "**We**", "**Our**" and "**Us**") collects, holds, uses and discloses about you. It also sets out how you can seek access to, and correction of, your personal information and complain about a potential or actual breach of the *Privacy Act 1988* (Cth) ("**Privacy Act**") and the Australian Privacy Principles ("**APPs**").

The kinds of personal information We collect, and how We use and disclose this information, will differ depending on the type of services We provide, and whether We are acting for you or another party.

From 1 September 2026, TCC is part of the Swiss Re Group. TCC provides debt recovery services in relation to commercial and trade debts. TCC may act for a creditor under a separate debt recovery agreement and, in some circumstances, may act on behalf of a relevant trade credit insurer or its authorised representative in relation to insurer-led recovery activities.

We are committed to protecting your privacy and will handle your personal information in accordance with this Privacy Policy and in accordance with Our obligations under the Privacy Act and the APPs.

What personal information do we collect and how do we collect it?

Depending on your interactions with Us, we may collect personal information. This information may include:

- identity and contact information, such as name, address, email address, telephone number, date of birth and other information used to identify or contact an individual;

- employment, occupation, business, directorship, partnership and other professional information;
- information about a debt, including invoices, contracts, statements, account details, payment history, amounts outstanding, disputes, correspondence, security, guarantees, settlements and recovery activity;
- financial and business information relevant to recovery, including financial position, assets, liabilities, solvency, insolvency or bankruptcy information and information about payment capacity;
- bank account and payment information where relevant to receiving, administering or remitting payments;
- court, enforcement, insolvency and other information obtained from public registers or publicly available sources;
- commercial credit and other credit-related information where permitted by law;
- information about complaints, disputes, financial difficulty, vulnerability or additional support needs;
- communications with us, including emails, letters, file notes and records of interactions;
- information provided through our websites, online forms and portals, including DebtNet; and
- technical information generated when you use our websites or portals, such as device, browser, IP address, usage and cookie information, as described in the applicable cookie notice.

Sensitive information and additional support

If you tell us that you need additional support, we may collect information about your circumstances where it is reasonably necessary to understand and respond to your needs. This may include sensitive information, such as health information, where it is reasonably necessary for our functions or activities and with your consent, unless the collection is otherwise permitted or required by law.

How do we collect personal information?

We may collect personal information directly from you depending on the capacity in which you interact with us. For example, you may be:

- a client or creditor who appoints TCC to provide debt recovery services, or an employee or representative of that client;
- a debtor, guarantor, director or other person connected with a debt or recovery matter;
- an insured or policyholder;
- a broker, intermediary, authorised representative or agent;
- a person involved in an insurer-led recovery;
- a complainant or person requesting financial difficulty or additional support; or

- another person involved in the provision or administration of our services.

We may collect personal information directly from you when you communicate or deal with us, place or administer a debt for recovery, provide information or documents about a recovery matter, use our website or portals, make or receive a payment, discuss or negotiate a repayment or settlement proposal, dispute a debt, make an enquiry or complaint, request additional support or otherwise interact with us.

We may also collect personal information about you from third parties where this is reasonably necessary for our functions or activities and permitted by law. Depending on the matter, these third parties may include:

- our clients and creditors, including policyholders, who appoint us to provide debt recovery services or provide information about debts and debtors;
- QBE Insurance (Australia) Limited, Swiss Re International SE, Australia Branch and other relevant insurers or reinsurers, and their related bodies corporate, where relevant to a debt, recovery, insurance claim or insurer-led recovery;
- other Swiss Re Group entities that assist TCC in providing or administering its services;
- brokers, intermediaries, authorised representatives and agents;
- debtors, guarantors and other persons connected with a debt or recovery matter;
- publicly available sources, including company, court, insolvency and other public registers;
- external lawyers, insolvency practitioners, investigators, tracing or search providers, process servers, mercantile agents and other recovery service providers;
- banks, payment providers and other financial service providers involved in payments or recoveries;
- technology, data and information service providers; and
- credit reporting bodies or other credit information providers, where permitted by law.

We may also collect personal information from other persons or organisations involved in a debt, recovery, insurance or related matter where it is unreasonable or impracticable for us to collect the information directly from you and the collection is otherwise permitted by law.

If We are not able to collect personal information about you We may not be able to provide you with the services or assistance you require. The collection, use, storage or disclosure of your personal information is needed to administer matters. If you are a debtor, choosing not to provide information to us will not necessarily prevent us from continuing to administer or recover the debt using information otherwise lawfully available to us, subject to applicable law.

For what purposes do we collect, use and disclose your personal information?

We collect, hold, use and disclose personal information for purposes reasonably necessary for our functions and activities, which may include to:

- identify individuals and verify identity where appropriate;
- onboard clients, establish and administer recovery matters and provide debt recovery services;
- understand, verify and administer debts and related instructions, records, disputes, security and payment information;
- contact debtors and other relevant parties and conduct lawful debt recovery activity;
- develop and implement recovery strategies, negotiate payment arrangements or settlements within our authority and monitor compliance with agreed arrangements;
- refer matters to external legal or recovery service providers where appropriate and authorised;
- receive, hold, reconcile, account for and remit recovered amounts and administer applicable trust account arrangements;
- provide clients with reports and information about recovery activity and outcomes;
- provide recovery information to a relevant insurer or its authorised representative, and communicate insurer information or decisions. TCC will not provide its own view on insurance coverage or claim eligibility;
- manage complaints, debt disputes, financial difficulty, vulnerability and additional support requests;
- comply with legal, regulatory, licensing, trust-account, audit, reporting, recordkeeping and governance obligations;
- prevent, detect and investigate fraud, misuse, security incidents and other unlawful or inappropriate activity;
- manage our service providers, technology, records, business continuity, quality assurance, training, audit, risk and compliance activities;
- undertake analytics, service development and business planning using personal information where permitted by law; and
- market and communicate with clients and prospective clients about TCC's debt recovery services, where permitted by applicable privacy, spam and direct-marketing laws; and
- provide factual information about, or refer clients to, relevant products and services offered by Swiss Re Group entities, where permitted by law.

We may also use and disclose your personal information for research and analytical purposes, to perform administrative functions and to comply with our legal obligations.

We will not disclose your sensitive information for any purpose other than the purpose for which it was collected or a directly related secondary purpose, unless you otherwise consent.

If you provide us with personal information about others, you must make them aware of the details in this Privacy Policy.

Who will we disclose your personal information to?

We do not sell your personal information to third parties.

Depending on the matter, the capacity in which TCC is acting and subject to applicable law, we may disclose personal information to:

- the client, creditor or policyholder for whom we are providing debt recovery services, and their authorised representatives;
- the relevant insurer or reinsurer, including QBE Insurance (Australia) Limited or Swiss Re International SE, Australia Branch, and their authorised representatives or related bodies corporate, where the disclosure is relevant to a policy, claim, recovery, complaint, financial hardship matter or other process undertaken on behalf of, or under authority from, the insurer;
- the insured, policyholder or creditor associated with an insurer-led recovery, where TCC is authorised to provide factual recovery information or communicate information or decisions of the relevant insurer;
- debtors, guarantors and their authorised representatives, where reasonably necessary to communicate about, verify, negotiate, administer or recover the relevant debt, deal with a dispute or payment arrangement, or otherwise administer the recovery matter;
- authorised representatives, financial counsellors, advocates or support persons, where you have authorised us to communicate with them or the disclosure is otherwise permitted by law, including in connection with financial difficulty or additional support;
- Swiss Re Group companies that provide personnel or assist TCC with governance, operations, technology, administration, risk, compliance or service delivery;
- brokers, intermediaries, authorised representatives and other agents, where relevant and authorised;
- external lawyers, insolvency practitioners, tracing or search providers, investigators, process servers, mercantile agents and other recovery or enforcement service providers;
- banks, payment providers and other financial service providers involved in receiving, holding, reconciling or remitting money;
- technology, cloud, communications, records-management, mailing and other service providers;
- auditors, accountants, advisers and other professional service providers; and

- courts, tribunals, external dispute-resolution bodies, regulators, government agencies, law-enforcement bodies and other persons where disclosure is required or authorised by law.

There will be other instances when We may use and disclose your personal information where permitted or required by the Privacy Act and the APPs, or another applicable law, including where:

- you have expressly or impliedly consented to the use or disclosure;
- We reasonably believe that the use or disclosure is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body; or
- We are required or authorised by law to disclose your personal information, for example, to a court in response to a subpoena or to the Australian Taxation Office, Centrelink, Australian Transaction Reports and Analysis Centre.

Do we disclose your personal information overseas?

We may disclose your personal information to Our related companies and third parties overseas or allow those recipients to access personal information, where this is required to support TCC's operations, technology, administration, governance, compliance or service delivery.. These recipients may be located in Hong Kong SAR, India, Singapore, Malaysia, the United Kingdom, Switzerland, the United States of America, the Slovak Republic, the Philippines and Japan. In order for these companies to assist Us in providing Our services, they may access your personal information through Our international group wide IT systems.

Website, cookies and online services

When you use TCC webpages hosted on Swiss Re's website, cookies and similar technologies may be used to operate and secure the website, understand how it is used and, where permitted, provide analytics or relevant content. Further information about the cookies and similar technologies used on the Swiss Re website, including how you can manage your preferences, is available in the Swiss Re Cookie Notice and Cookie Settings.

We may also collect technical and usage information through our websites and online services, such as IP address, browser and device information, pages visited and interaction information, where permitted by law.

DebtNet remains accessible from the TCC website as a customer portal. DebtNet or other third-party online services may have separate privacy or cookie notices that apply to their use. Personal information collected by or provided to TCC through those services will be handled in accordance with this Privacy Policy and any applicable collection notice.

How do we hold your personal information and keep it secure?

We hold your personal information in a combination of computer storage facilities and paper-based files.

All reasonable steps are taken to ensure that the information is accurate, complete, up-to-date and relevant and only the information that is required for Our functions and activities is collected. All personal information is held securely. Access to such information by Swiss Re employees is subject to strict guidelines.

Anonymity and pseudonymity

If you are subject to the Australian privacy regime, you may choose not to identify yourself or to use a pseudonym when dealing with Us, unless We are required or authorised under Australian law or a court/tribunal to identify you, or it is impracticable for Us to deal with you anonymously or using a pseudonym. It will generally be impracticable for TCC to administer or discuss a particular debt, recovery or payment without verifying relevant identity information.

How can you seek access to, and correction of, your personal information?

You may seek access to, and correction of, your personal information We hold about you by contacting Our Privacy Compliance Officer on (02) 8295 9500 or via a letter or email addressed to:

Privacy Compliance Officer
Trade Credit Collections Pty Ltd
Level 36, Tower Two, International Towers Sydney
200 Barangaroo Avenue
Sydney, NSW 2000

Email: *anz_compliance@swissre.com*

Privacy enquiries and complaints

How can you complain about a breach of your privacy?

If you wish to make a complaint about Our handling of your personal information or you believe there may have been a breach of the APPs in respect of the personal information We collect and hold about you, please contact Our Privacy Compliance Officer using the contact details in the section above. We may ask you to put your complaint in writing if it cannot be resolved over the phone. We will investigate your complaint and notify you of Our decision in relation to your complaint as soon as practicable after we receive it.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC). Information about making a privacy complaint is available at oaic.gov.au.
If a privacy issue forms part of a complaint about a QBE Insurance (Australia) Limited or Swiss Re International SE, Australia Branch insurance policy, claim, insurer decision, insurer-led recovery or financial hardship matter, the relevant insurer’s complaints process may also apply. The Australian Financial Complaints Authority may be available where the complaint falls within its Rules.