

**CR Code Variation – Additional Issues from Consultation**

| Organisation       | CR Code provision (if applicable) | Issue   | Initial response  |
|--------------------|-----------------------------------|---|---|
| Westpac            | 6.2(a)                            | Variation for credit cards so that the date when credit is available is the date when the CP approves the credit card contract.<br>(Similar approach has been taken in NCCP Regs 25K where 90 day assessment period changed from 'within 90 days of entering the credit contract' to 'within 90 days of providing the consumer with a credit card') | ARCA to obtain further Member feedback, update OAIC on industry views.<br>If it appears such a variation has industry support, ARCA will undertake further broad consultation (with a view to possible variation) |
| ING                | 9.3                               | Clarification required of approach for giving of default notices to authorised representatives  | ARCA to obtain further Member feedback, update OAIC on industry views.<br>If it appears such a variation has industry support, ARCA will undertake further consultation (with a view to possible variation)       |
| EWON               | New Privacy Regulation            | Increase of default threshold (possibly to \$300)   | ARCA to discuss further with OAIC   |
| Consumer advocates | 8                                 | RHI and hardship (PWC issue 5)  | RHI and hardship is currently being addressed through the Attorney-General Department's and Treasury review, as well as a separate consultation between industry, government, regulators and consumer advocates   |
|                    | 19.4                              | Inclusion of credit scores on free credit reports (PWC issue 6)   | ARCA to discuss further with consumer advocates and Members, update OAIC on these discussions   |
|                    | 11.1                              | Reporting writs and summons as credit information (PWC issue 14b)   | To be addressed in second tranche of CR Code variations   |

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|  | <b>19</b> | <b>Marketing to consumers who have requested a free credit report (PWC issue 8)</b>                | <b>To be addressed in second tranche of CR Code variations</b>  |
|  | <b>19</b> | <b>Access 'trail' on credit reports (PWC issue 23)</b>   | <b>ARCA to discuss further with consumer advocates and Members, update OAIC on these discussions</b>  |
|  | <b>20</b> | <b>Corrections (PWC issue 18) – 4 additional suggestions noted in discussion of 20.9 variation</b> | <b>ARCA to obtain further Member and consumer advocate feedback, update OAIC on these views.<br/>If it appears variations are required, ARCA will undertake further consultation (with a view to inclusion in second tranche of variations)</b> |