



# **illion (New Zealand) Limited**

## **Assurance Report**

Under Rules 5 and 8 and Clause 8 and Schedule 7 of the Credit Reporting Privacy Code for the year ending 30 June 2025

September 2025

Level 33, 23/29 Albert Street, Auckland Central, Auckland 1010, New Zealand

[illion.co.nz](http://illion.co.nz)

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# 1. Introduction

- 1.1. The Credit Reporting Privacy Code 2020 (the **Code**) requires credit reporters to provide a report (the **Report**) to the Office of the Privacy Commissioner (the **OPC**) each year.<sup>1</sup>
- 1.2. The report must meet the requirements contained in the Code.<sup>2</sup> The Code requires that the report must provide a reasonable assurance that a credit reporter is compliant with the Code and has sufficient assurance mechanisms. These requirements include that the credit reporter has policies in place to comply with the Code, it monitors compliance, and where it identifies issues, that it works to resolve those issues.
- 1.3. This Report covers the period from 1 July 2024 to 30 June 2025. It was prepared by an independent person alongside illion (the **Review Committee**).
- 1.4. The Review Committee was formed in compliance with the requirements of the Code.

# 2. The Review Committee

- 2.1. The review committee is made up of the following members:
  - Stephen Blyth, Head of Compliance & Privacy
  - Kristy Bamford, Manager Public Access Centre
  - Deon Wong, Senior Legal Counsel
  - Mark Carver, Director & Principal Consultant, ThreeBlackCats, as Independent Person.

As part of the committee's involvement with the assurance process and preparation of the report, the committee met regularly to answer questions and monitor progress of the process. The review committee have followed an agreed process (the Assurance Procedure) which involved the independent person conducting all interviews and reviewing all relevant documents.

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<sup>1</sup> Clause 8.

<sup>2</sup> Specifically, the requirements contained in schedules 7 and 9 (5).

- 2.2. Information about Mr Mark Carver is set out in Appendix One. Mr Carver is not, and has never been, an employee, director, or owner of illion. He is independent of illion and has had no role in its compliance programme. Aside from his role as Independent Person, for this review, he has never advised or provided services to illion on any matter.

### 3. The Assurance Procedure

- 3.1. This report is intended to provide a high-level but complete assurance review. It sets out statements to the OPC regarding illion's compliance with its obligations under the Code. Referenced policies, procedures, and controls have been sighted, reviewed and compliance is confirmed where applicable.
- 3.2. This Report breaks down the requirements of the Code into the individual components, and the supporting documentation relating to those components. It gives the title of the document(s) containing the policy, procedure or control, and outlines the Independent Person's commentary on illion's compliance with them and the Code.

## 4. Summary Assurance

Assurances relating to policies, procedures, controls and subscriber agreements.		
	Assurance Area	Requirement Met
2 (a)	Did illion have policies in place that give effect to the requirements of the Code?	Yes
2 (b)	Did illion have policies in place to ensure that any arrangement with a related company accords with clause 4(2) of this Code?	Yes
2 (c)	Did illion have internal procedures and controls to give effect to the policies and requirements of the Code?	Yes
2 (d)	Did illion have appropriate procedures in place to ensure that any information requested under rule 6 is received only by that individual or, where the request is made by an agent on behalf of the individual, only by that individual or his or her agent (such procedures must amongst other things ensure, as far as possible, that where information intended for an individual is received by a properly authorised agent that it is not subject to bundled authorisations for other purposes that would have the purpose or effect of circumventing the code's prohibitions on marketing and direct marketing)?	Yes
2 (e)	Did illion provide information and training to staff to ensure compliance with the policies, procedures, and controls?	Yes
2 (f)	Did illion ensure subscriber agreements comply with Schedule 3 and were in place before disclosing credit information?	Yes
2 (g)	Did illion ensure access agreements under Schedule 4 were in place before disclosing credit information?	Yes

Assurances relating to monitoring of policies, procedures, controls and subscriber agreements.		
	Assurance Area	Requirement Met
3 (a)	Did illion monitor that it followed its own policies, procedures and controls?	Yes
3 (b)	Did illion monitor that information held by illion was protected by reasonable security safeguards?	Yes
3 (c)	Did illion monitor that it processed information privacy requests in accordance with rules 6 and 7?	Yes
3 (d)	Did illion take such measures as were reasonably practicable to avoid the incorrect matching of information held by the credit reporter?	Yes
3 (e)	Did illion ensure the information held by the credit reporter was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading?	Yes
3 (f)	Did illion ensure reporting and retention of credit information was in accordance with rule 9 and Schedule 1?	Yes
3 (g)	Did illion process direct marketing lists in accordance with Schedule 10?	Not applicable for this period
3 (h)	Did illion process suppression, release or cancellation requests in accordance with Schedule 8?	Yes
3 (i)	Did illion process complaints in accordance with clause 7?	Yes
3 (j)	Did illion's website display accurate information giving effect to rules 6(7)(b), 7(5)(b), clause 7(4) and clause 8.1 of Schedule 8?	Yes
3 (k)	Did illion ensure subscribers complied with agreements and controls?	Yes
3 (l)	Did illion ensure the intelligence and security agencies complied with any access agreements and controls?	Not applicable for this period
3 (m)	Did illion ensure the requirements on both the subscribers and the credit reporter under Schedule 11 in relation to tracing individuals were met?	Not applicable for this period
5 (Sch 9)	Did illion undertake monitoring activities to ensure that they only reported small defaults relating to an overdue payment equal to or more than \$100?	Yes

<b>Assurances relating to an action taken on deficiencies identified.</b>		
	<b>Assurance Area</b>	<b>Requirement Met</b>
4 (a)	Did illion identify any breaches of an agreement, policy, procedure, control, or requirement of the code during its systematic reviews, monitoring activities or as a result of a complaint and then investigate that breach and where appropriate, take prompt remedial action?	Yes
4 (b)	Did illion, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Yes

## 5. Specific Assurance

- 5.1. illion's core business activities are compliant with the Code and assurance activities exist to monitor Code compliance. illion has well established, mature policies and procedures in place and monitors those effectively. Interviewed staff were confident about their individual obligations and demonstrated an understanding of the importance of adhering to illion's policies.
- 5.2. During the reporting period illion's Australian and New Zealand businesses were acquired by Experian Australia Credit Services Pty Ltd (ACN 150 305 838) ('Experian') a subsidiary of Experian PLC, with the transaction completing on the 30<sup>th</sup> of September 2024. Post acquisition, operationally illion's New Zealand credit reporting functions continued to operate largely independently, in a manner as before the acquisition.

It was noted that a limited number of integration initiatives were completed during the reporting period:

- illion implemented Experian's three-tier risk management framework for risk and issues management, with a view that illion will adopt Experian's full governance framework next year.
- illion have implemented Experian's Elevate learning management platform and are in the process of migrating compliance to it. Info Sec and other training is catered for already.
- Additionally, following the acquisition, illion will receive the benefit of information security and data governance of Experian as a global company.
- Some Experian staff joined the Public Access Centre, these were trained and successfully integrated into the team.

In addition, further integration initiatives are being planned for the next reporting period (July 2025 – June 2026).

- 5.3. illion as part of its continuous improvement program made a number of improvements / changes during the reporting period. A summary of the major changes includes:
- The use of Salesforce, replacing Outlook, to capture and manage customer related enquiries. This provides for better tracking and processing of enquiries, reporting and assignment of work.
  - Customer complaints are now logged in Jira for better tracking.
- 5.4. During the reporting period OPC's postal address changed to PO Box 10094 Wellington 6140. illion has confirmed that the postal address has been changed and is recorded on its website in the Summary of Rights (<https://illion.co.nz/summary-of-rights-2020/>). The changes were also verified by the Independent Person.

**Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements**

	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
2 (a)	Did illion have policies in place that give effect to the requirements of the Code?	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Compliance Training Policy</li> <li>• illion Information Security Policy</li> <li>• Experian Global Information Security Policy</li> <li>• CCB Data Access Policy</li> <li>• Employment Agreements</li> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Complaint Handling Policy &amp; Work Instructions</li> <li>• Corrections Handling Policy &amp; Work Instructions</li> </ul>	Yes	<p>illion has well established, robust and mature policies and procedures in place to give effect to the requirements of the Code.</p> <p>Privacy expectations for staff are clearly outlined in employee agreements.</p> <p>All staff must complete mandatory training both during initial onboarding and then annually at minimum. Public Access Centre staff receive additional, specific training relevant to their role.</p> <p>Post the adoption of Experian's Elevate platform compliance training is occurring over time and Experian has similar compliance training tracking and monitoring to ensure that all mandatory training is completed.</p> <p>Policies are reviewed annually at minimum and updated where required. Of note, both the complaints handling policy and corrections policy were split out from the general Public Access Centre Procedures and updated to include further detail. Similarly, policies are being migrated over to align with Experian's policies.</p>
2 (b)	Did illion have policies in place to ensure that any arrangement with a related company accords with clause 4(2) of this Code?	<ul style="list-style-type: none"> <li>• Master Services Agreement</li> <li>• Work Order – Consumer Risk Services</li> <li>• Product Schedule</li> <li>• CCB Data Access Policy</li> </ul>	Yes	<p>illion has established practices to ensure that a related company's actions are consistent with clause 4(2) of the Code and the obligations on illion as a credit reporter.</p> <p>illion's standard contract agreements (which consist of the Work Order, Master Services Agreement and Product Schedule) ensure they comply with the relevant</p>

**Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements**

	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
				<p>obligations. Non-standard agreements are reviewed and finalised by illion’s Legal team to ensure they continue to satisfy the regulatory obligations.</p> <p>illion’s CCB Data Access Policy specifically states that data access is by default prohibited for any other related company.</p> <p>Access and use of its credit reporter information is restricted to staff that are authorised to use that information for permissible purposes, this applies to all staff including those of related companies.</p>
2 (c)	Did illion have internal procedures and controls to give effect to the policies and requirements of the Code?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Complaint Handling Policy &amp; Work Instructions</li> <li>• Corrections Handling Policy &amp; Work Instructions</li> <li>• Manual ID Verification Procedure &amp; Work Instructions</li> <li>• Manual Bans and Manual Suppressions Procedure &amp; Work Instruction</li> <li>• Data Breach &amp; Cyber Incident Response Plan</li> <li>• illion Information Security Policy</li> <li>• Experian Global Information Security Policy</li> <li>• CCB Data Access Policy</li> </ul>	Yes	<p>illion has well established, mature internal procedures and controls to give effect to the policies and requirements of the Code, these include:</p> <ul style="list-style-type: none"> <li>• The Public Access Centre Procedures / Work Instructions details the procedures for handling consumer requests as well as work instructions covering other operational functions.</li> <li>• The Complaint Handling Policy details the procedures for handling complaints including notification of complaints to or received from the New Zealand Privacy Commissioner. Logging and handling of complaints is performed in Jira for tracking and actioning of complaints.</li> <li>• Corrections Handling Policy details the procedures for handling correction of information requests.</li> </ul>

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
				<ul style="list-style-type: none"> <li>Processes are in place where individuals require manual ID verification.</li> <li>There are detailed work instructions for dealing with manual suppression requests.</li> <li>The Data Breach &amp; Cyber Incident Response Plan sets out the roles and responsibilities of illion staff when detecting, responding to and managing data breaches, cyber incidents or near misses.</li> <li>The Information Security Policy provides detailed guidance on how illion maintains effective security measures.</li> </ul> <p>Policy non-compliance and necessary procedures to follow for identified issues are included in each of the relevant policies.</p>
2 (d)	Did illion have appropriate procedures in place to ensure that any information requested under rule 6 is received only by that individual or, where the request is made by an agent on behalf of the individual, only by that individual or his or her agent (such procedures must amongst other things ensure, as far as possible, that where information intended for an	<ul style="list-style-type: none"> <li>Public Access Centre Procedures / Work Instructions</li> <li>Manual ID Verification Procedure &amp; Work Instructions</li> </ul>	Yes	<p>Most access requests are automatically processed via illion's on-line portal which includes appropriate identification of the individual. Requests are now captured in Salesforce for better tracking and processing with the exception of Credit Check requests which are processed via illion's standard correction process.</p> <p>The Public Access Centre Procedures / Work Instructions include processes for handling the few manual access requests received via the Public Access Centre.</p>

**Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements**

	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
	individual is received by a properly authorised agent that it is not subject to bundled authorisations for other purposes that would have the purpose or effect of circumventing the code's prohibitions on marketing and direct marketing)?			<p>There is a specific procedure that includes set criteria for identifying an individual or their agent and handling any issues relating to identifying or linking an individual through the on-line portal.</p> <p>illion utilises an online identity verification service / tool to assist with verification of individuals.</p> <p>Public Access Centre staff receive appropriate training on how to handle access requests.</p>
2 (e)	Did illion provide information and training to staff to ensure compliance with the policies, procedures, and controls?	<ul style="list-style-type: none"> <li>• Compliance Training Policy</li> </ul>	Yes	<p>All staff must complete mandatory training both when initially onboarded and then annually. Training attendance is monitored, and appropriate actions are in place for non-compliance. Automated reminders about training and the importance of following procedures are provided to staff on a regular basis.</p> <p>Public Access Centre staff receive specific training relevant to their role. Relevant Public Access Centre staff also completed OPC's online training relating to credit reporting which is also tracked for completion.</p> <p>In addition, the Public Access Centre has introduced a buddy system to mentor new staff, and it has also introduced individual development plans.</p> <p>Training is being migrated to Experian's Elevate training platform over time so there is one common platform which allows users to undertake training on demand and which provides improved reporting.</p>

Schedule 7 clause 2: Assurances relating to policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
				It was confirmed that all staff had completed their annual mandatory and additional specific training.
2 (f)	Did illion ensure subscriber agreements comply with Schedule 3 and were in place before disclosing credit information?	<ul style="list-style-type: none"> <li>• Master Services Agreement</li> <li>• Work Order – Consumer Risk Services</li> <li>• Product Schedule</li> <li>• Privacy Disclosure Statement</li> </ul>	Yes	<p>illion’s Master Services Agreement and Consumer Risk Services Product Schedule together comprise the subscriber agreement. Collectively they give effect to the requirements of Schedule 3.</p> <p>In addition, prior to disclosing credit information to a subscriber, subscribers must also complete a Privacy Disclosure Statement form to assist in reminding a Credit Provider of the requirements of the Code.</p> <p>As part of the subscriber onboarding process the Client Integration Team ensures that all required agreements are in place and signed, until then illion will not disclose credit information to a subscriber.</p>
2 (g)	Did illion ensure access agreements under Schedule 4 were in place before disclosing credit information?	<ul style="list-style-type: none"> <li>• Master Services Agreement</li> <li>• Work Order – Consumer Risk Services</li> <li>• Product Schedule</li> <li>• Privacy Disclosures Statement</li> </ul>	Yes	<p>Customers are only allowed access once they have agreed to the Subscriber Agreement and the Privacy Disclosure Statement. Code aspects of these terms and conditions remain non-negotiable.</p> <p>As part of the customer onboarding process the Client Integration Team ensures that all required agreements are in place and signed.</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
3 (a)	Did illion monitor that it followed its own policies, procedures and controls?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Data Quality Procedures</li> <li>• Monthly Reports</li> </ul>	Yes	<p>Public Access Centre staff activity is monitored by both team leaders and managers, this includes reviewing call recordings, standard response templates, and tracking activity levels. Staff compliance with policies and procedures are also monitored.</p> <p>illion's Data Quality Procedures includes reporting which tracks consumer data quality issues. These include high-level reports for senior management review.</p> <p>illion operates in a manner of continuous improvement, to highlight and implement improvements to its policies, procedures and controls. As systems and processes are mature and provide all required information, no changes to any of the systems or processes relating to Data Quality were necessary during the period.</p>
3 (b)	Did illion monitor that information held by illion was protected by reasonable security safeguards?	<ul style="list-style-type: none"> <li>• illion Information Security Policy</li> <li>• Experian Global Information Security Policy</li> <li>• Information Security Framework</li> <li>• Data Breach &amp; Cyber Incident Response Plan</li> </ul>	Yes	<p>illion's Information Security Policy describes the guiding principles that ensure the confidentiality, integrity, and availability of illion's information assets and for the secure operation of IT resources. It documents the roles and responsibilities of all staff and addresses organisational security issues.</p> <p>The Data Breach &amp; Cyber Incident Response Plan sets out the roles and responsibilities of illion staff</p>

**Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements**

	<b>Assurance Area</b>	<b>Relevant Documentation</b>	<b>Requirement Met</b>	<b>Commentary</b>
		<ul style="list-style-type: none"> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Consumer Credit Bureau Data Access Policy</li> </ul>		<p>when detecting, responding to and managing data breaches, cyber incidents or near misses. The plan is tested annually where illion undertakes a mock tabletop exercise facilitated by an external party. It was confirmed that the plan was tested during the reporting period.</p> <p>illion's security policies are designed to comply with the ISO/IEC 27001:2013 and SOC2 standards. The standards are audited annually by an external party. There were no non-compliance issues identified in the latest audit.</p> <p>During the reporting period, illion migrated to and now follows Experian's three-tier risk management framework for risk and issues management.</p> <p>Information Security training is mandatory for all staff on an annual basis (delivered via Experian's Elevate online training platform). Non-compliance is monitored and addressed appropriately.</p> <p>It was confirmed that all staff had completed all information security training as part of their mandatory training.</p>
3 (c)	Did illion monitor that it processed information privacy requests in accordance with rules 6 and 7?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Corrections Handling Policy</li> </ul>	Yes	The Public Access Centre Procedures / Work Instructions and Corrections Handling Policy contain detailed procedures in relation to information privacy access and correction requests.

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
		<ul style="list-style-type: none"> <li>• illion Corrections NZ Procedure &amp; Work Instruction</li> </ul>		<p>With respect to correction requests, illion introduced FAQs as part of the correction request process in the previous reporting period to give better guidance on how information may be corrected and what the requirements may be. This has continued to reduce the volume of correction requests, reduce complaints and improve customer experience.</p> <p>Public Access Centre staff activity is monitored by both team leaders and managers, this includes reviewing call recordings, standard response templates, and tracking activity levels.</p> <p>Registers are maintained of requests and outcomes; these are monitored to ensure that requests are being handled correctly.</p> <p>Daily trend reporting within the Public Access Centre assists with allocation of resources to respond to queries.</p> <p>In addition, the Privacy Steering Committee reports on access and correction request metrics as part of monthly reporting.</p>
3 (d)	Did illion take such measures as were reasonably practicable to avoid the incorrect matching of information held by the credit reporter?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Data Quality Procedures</li> </ul>	Yes	<p>illion uses sophisticated, automated rank and match techniques to match information within illion's systems. It also caters for demographic shifts and includes machine learning algorithms to assist identify matching issues that may not be</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
				<p>readily identifiable using traditional matching algorithms.</p> <p>The combination of techniques balances the need to provide accurate matches with complete and accurate information.</p> <p>The Public Access Centre Procedures / Work Instructions provides detailed instructions for handling manual matching of records.</p> <p>The Data Quality Team uses the monthly reporting and sample data to monitor matching performance.</p> <p>Reports are provided to Credit Providers to improve data quality at source.</p>
3 (e)	Did illion ensure the information held by the credit reporter was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Data Quality Procedures</li> </ul>	Yes	<p>illion uses sophisticated rank and match techniques to match information.</p> <p>The Public Access Centre Procedures / Work Instructions provides detailed instructions for handling manual matching of records.</p> <p>The Data Quality Team uses the monthly reporting and sample data to monitor matching performance.</p> <p>Reports are provided to Credit Providers to improve data quality at source.</p>
3 (f)	Did illion ensure reporting and retention of credit information was in	<ul style="list-style-type: none"> <li>• System software</li> </ul>	Yes	<p>illion's core systems automatically dispose of records according to automated rules that are</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
	accordance with rule 9 and Schedule 1?			<p>established in accordance with the Code's requirements.</p> <p>There are specific retention rules for New Zealand. Separate daily processes operate for New Zealand, with error checking to alert if any step fails.</p> <p>illion's data quality processes track that systems operate in the manner they were designed as part of its review process.</p>
3 (g)	Did illion process direct marketing lists in accordance with Schedule 10?	Not applicable during the reporting period.		
3 (h)	Did illion process suppression, release or cancellation requests in accordance with Schedule 8?	<ul style="list-style-type: none"> <li>• Public Access Centre Procedures / Work Instructions</li> <li>• Manual Bans and Manual Suppressions Procedure &amp; Work Instruction</li> </ul>	Yes	<p>illion, uses automated suppression (initiation, extension and release) requests via its website. This improves response times and illion's ability to handle increased volumes.</p> <p>The Public Access Centre also has detailed work instructions for dealing with manual suppression requests.</p> <p>Suppression requests are reported daily.</p>
3 (i)	Did illion process complaints in accordance with clause 7?	<ul style="list-style-type: none"> <li>• Complaint Handling Policy and Procedure</li> </ul>	Yes	<p>illion has a complaint handling procedure that aligns with the Standards for Complaints Handling AS/NZS 10002:2014.</p> <p>illion's website has clear instructions to assist customers with making a complaint. It also includes a set of FAQs to assist customers find</p>

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
				<p>answers to queries, which has reduced complaints. Individuals can also lodge a complaint through the website via a web form.</p> <p>All escalated complaints are reviewed for systemic themes and whether they reveal broader issues.</p>
3 (j)	Did illion's website display accurate information that gave effect to rules 6(7)(b), 7(5)(b), clause 7(4) and clause 8.1 of Schedule 8?	<ul style="list-style-type: none"> <li>• illion.co.nz</li> </ul>	Yes	<p>illion's website displays accurate information.</p> <p>The website was updated during the year to include any necessary changes.</p> <p>OPC's postal address was also updated on the website.</p>
3 (k)	Did illion ensure subscribers complied with agreements and controls?	<ul style="list-style-type: none"> <li>• Master Services Agreement</li> <li>• Work Order – Consumer Risk Services</li> <li>• Product Schedule</li> <li>• Privacy Disclosure Statement</li> </ul>	Yes	<p>When new subscribers are onboarded product profiles are established to ensure the correct data elements are shared. The Client Integration Team ensures all agreements are setup correctly.</p> <p>As part of its Data Quality process illion considers a subscriber's usage matches their declared use case and product profile.</p> <p>Along with tracking complaints and correction requests illion monitors and reports both daily and monthly on trends as a means of identifying non-compliance.</p>
3 (l)	Did illion ensure the intelligence and security agencies complied with any access agreements and controls?	Not applicable during the reporting period.		

Schedule 7 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements				
	Assurance Area	Relevant Documentation	Requirement Met	Commentary
3 (m)	Did illion ensure the requirements on both the subscribers and the credit reporter under Schedule 11 in relation to tracing individuals were met?	Not applicable during the reporting period.		
5 (Sch 9)	Did illion undertake monitoring activities to ensure that they only reported small defaults relating to an overdue payment equal to or more than \$100?		Yes	illion's core systems prevent the recording of small default amounts less than the amount permissible in the Code.

Schedule 7 clause 4: Assurances relating to action taken on deficiencies identified in last year's report.			
	Assurance Area	Response	Commentary
4 (a)	Did illion identify any breaches of an agreement, policy, procedure, control, or requirement of the code during its systematic reviews, monitoring activities or as a result of a complaint and then investigate that breach and where appropriate, take prompt remedial action?	Yes	No significant breaches were identified during the reporting period. Individual complaints were handled in accordance with illion's dispute resolution process, which includes contributing to process improvement and operator coaching where relevant.

**Schedule 7 clause 4: Assurances relating to action taken on deficiencies identified in last year's report.**

	<b>Assurance Area</b>	<b>Response</b>	<b>Commentary</b>
4 (b)	Did illion, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Yes	<p>No material deficiencies were identified in the previous year's report that required remedial action during this reporting period.</p> <p>It is noted that illion operates in a manner of continuous improvement, to highlight and implement improvements to its policies, procedures and controls. A number of improvements were made through the reporting period which have been included within this report.</p>

# Appendix One

Mark Carver is a founding Director and Principal Consultant for ThreeBlackCats Limited which specialises in privacy, security and AI Governance.

Prior to founding ThreeBlackCats, Mark was a Director and Principal Consultant for TwoBlackLabs, founded in 2017 as a specialist privacy consultancy. More recently Mark was employed as Principal Privacy Consultant for Mosaic for 3-years. Mark has worked in both privacy and security fields, as a consultant.

Mark has previously undertaken the illion assurance report for the reporting periods, year ending 30th June 2022, year ending 30th June 2023 and year ending 30th June 2024.

A statement from Mark with regards his role as an independent party has been supplied separately.