



Equifax New Zealand Information Services and Solutions Limited

Assurance Report

Year ending 30 June 2025

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1. Introduction

- 1.1. Equifax New Zealand Information Services and Solutions Limited (Equifax) is a leading provider of credit information and data driven solutions in New Zealand.
- 1.2. Equifax's customers in New Zealand use data intelligence provided by Equifax to make decisions on credit risk, verify identity and employee background, reduce identity theft and fraud, and undertake marketing strategies.
- 1.3. Clause 8 of the Credit Reporting Privacy Code 2020 (**Code**) mandates that Equifax provide an annual report (this **Assurance Report**) to the Office of the Privacy Commissioner (**OPC**) prepared in accordance with the requirements of Schedule 7 of the Code. Equifax has endeavoured to address all the requirements of the OPC Assurance Review through this Assurance Report.
- 1.4. This Assurance Report was prepared in line with Equifax's formal Compliance Program, a key component of which is an Assurance Review Committee constituted in accordance with clause 8(2)(b) of the Code, which includes an independent person with expertise in relation to matters of Code compliance (**Independent Person**). The Independent Person has contributed to Equifax's internal Compliance Program by providing assessment and assurance for the period 1 July 2024 to 30 June 2025 (**Reporting Period**) in respect of Equifax's systematic review and monitoring processes. This report provides the Assurance Review Committee's overall conclusions and assurance on compliance with the Code for the Reporting Period.

2. Process of Review and Reporting

Overview of the Assurance Reporting Process

- 2.1. Equifax has taken the following systematic approach in developing this Assurance Report:

1. Equifax Internal Compliance Program	2. Engagement of Independent Reviewer	3. Finalisation of the Assurance Report
<ul style="list-style-type: none">• Commencement of the Annual Compliance Program and periodic Assurance Review Committee meetings• Implementation of the Equifax Compliance Program, incorporating Code compliance as the driving force for compliance activities for the reporting year• Completing the obligation register and confirming controls through the attestation process.	<ul style="list-style-type: none">• Appointment of Independent reviewer• Communication with the Assurance Review Committee• Interview with the Independent Reviewer Obligations Owners• Documentation/ Support review along with agreed testing	<ul style="list-style-type: none">• Presentation of Independent Person's findings to the broader Assurance Review Committee• Deliberation on the Independent Person's findings by the Committee• Addressing the Committee's concerns and developing a corrective action plan• Report preparation and signoff by the Committee to be submitted

2.2. Equifax has prepared this Assurance Report through its Assurance Review Committee comprising of members with accountability and responsibility for the obligations set out in Schedule 7, as well as the Independent Person.

2.3. Process undertaken to gain assurance:

Step	Process Description
Step 1: Attestations	<p>The assurance process uses Equifax’s internal Compliance Program to enable periodic attestations of obligations and controls by the Obligation and Control Owners. These were facilitated by the Senior Manager – Regulatory Compliance and Governance and all results and findings were escalated to the Assurance Review Committee.</p> <p>All controls identified were mapped to the obligation. The accountable Obligation and Control Owners were provided with the obligations register and required to review control effectiveness and to provide reasonable assurance by way of supporting evidence.</p>
Step 2: Independent review	<p>The role of the Independent Person was to challenge and provide an independent perspective on the design suitability and operational effectiveness of internal controls and practices pertaining to the requirements of Schedule 7 of the Code.</p> <p>This was done through document reviews, interviews, and testing.</p> <p><i>Note: Documents reviewed include a selection of evidence required for the purpose of obtaining reasonable assurance. This includes, but is not limited to, policies and procedures, guidelines, monitoring and review results, complaints, registers, access rights, website content, templates, and application forms.</i></p>
Step 3: Review of results	<p>The results of both the attestation and review process were presented to the Assurance Review Committee for discussion, along with any recommendations and improvements.</p> <p>The Assurance Review Committee has also ensured that recommendations, if any, provided by the Independent Person have been incorporated into the Equifax Corrective Actions register for implementation.</p>
Step 4: Assurance Report	<p>The Assurance Report was prepared with the pragmatic and collective effort of the Assurance Review Committee with the aim of providing reasonable assurance to the OPC with respect to Equifax’s compliance with the Code.</p> <p>This report was approved by the Assurance Review Committee and Independent Person.</p>

Assurance Review Committee

2.4. Equifax has engaged an Assurance Review Committee to oversee the preparation of this Assurance Report. The Assurance Review Committee was comprised of members from within Equifax or its related Group members with accountability in line with the obligations set out in Schedule 7 (to enable a higher standard of reasonable assurance) and was assisted by a review and report from the Independent Person¹.

2.5. The Assurance Review Committee was comprised of the following members:

Committee Member	Position Title
Lisa Postlewaight	Country Manager, New Zealand
Deborah Malaghan	Head of Legal, New Zealand
Craig Allen-Ankins	Head of Privacy, Australia and New Zealand
Paul Dunne	GM - Customer Services, Australia and New Zealand
Alexander King	Head of Risk, Australia and New Zealand
Marcus Bruhn	GM, Data Commercialisation & Governance
Wayne Williamson	Chief Information Security Officer - ANZ
David VanderStraaten	Segment Leader - ANZ Technology
Michelle Olbricht	Independent Person

2.6. The Assurance Review Committee is a valuable governance body at Equifax that facilitates robust discussion relating to Code compliance and control enhancements. The Independent Person's contribution also enhances the process for Code compliance by providing an external view on internal policies, processes, and frameworks, ultimately resulting in improved compliance controls and risk mitigation.

2.7. This Assurance Report confirms that the Assurance Review Committee has facilitated the necessary level of scrutiny and discussion to provide reasonable assurance that Equifax has met all its Code requirements for the Reporting Period.

2.8. Specifically, the Assurance Review Committee has, within its scope, satisfied itself that Equifax has performed the following:

- Embedded a culture for Code compliance through a formal Compliance Program;
- Implemented the three lines of defence to ensure that appropriate controls are in place to confirm Code compliance;
- Reviewed and updated all applicable internal policies and process documents;
- Reviewed and updated the Code obligations register on a regular basis;

¹ The Independent Person's scope was to provide an external view on internal policies, processes and frameworks when reviewing compliance with the Code

- Conducted desktop reviews of documented policies and procedures, guidelines, monitoring and review results, complaints, registers, access rights, website material, templates and application forms;
- Conducted deep dives relating to any additional question areas;
- Engaged with Control Owners to assess and test control effectiveness where required;
- Considered and recorded recommendations from the Independent Person relating to control effectiveness, in the Corrective Actions register; and
- Drafted this Assurance Report in conjunction with deliberation and review sessions.

Independent Person

- 2.9. Equifax retained the services of Michelle Olbricht, a consultant from INFO by Design Limited as its Independent Person for this Reporting Period.
- 2.10. Michelle Olbricht is an independent person with expertise in relation to matters of compliance with the Code, and is not an employee, director, or owner of the credit reporter.
- 2.11. Attached as **Appendix A** to this report is a statement from Michelle Olbricht, confirming her independence, summarising her expertise and outlining her involvement with the assurance process and preparation of the report.

Independent Person's Report Summary

- 2.12. The assurance process undertaken by the Independent Person during this Independent Review included:
- Review of documentation provided by Equifax, while onsite at Equifax's Auckland office, and off-site. Two hundred and twenty (210) documents were reviewed and assessed against the requirements of the Code.
 - Interviews with nine (9) key staff.
 - Assessment of the policies, processes and controls identified through the review of documentation, interviews, walk-throughs, and sample testing against the code's requirements. This assessment aimed to determine whether reasonable assurance of compliance with Equifax's obligations could be established.
 - Where evidence of compliance was not provided or opportunities for improvement were identified, a risk assessment was undertaken. This risk assessment considered the likelihood of non-compliance with Equifax's obligations under the code. Recommendations that reflect this risk assessment were then developed.
 - Walk-throughs and process analyses were also conducted for new subscribers, access requests and requests for corrections/complaints. The complaints process is combined with the corrections process. As a result, walk-throughs of a sample of corrections ensured that the correction was managed within appropriate timeframes and in accordance with the corrections process.
- 2.13. There are no indications of non-compliance with the Code or of Equifax not meeting its obligations. The Independent Person is of the opinion that Equifax is well placed to continue to be able to provide reasonable assurance over its compliance with the Code.
- 2.14. Two recommendations have been made:

2.14.1. **Recommendation 1 – Mandatory website information**

A review of the requirements under Schedule 8, clause 8.1 (to provide certain information about suppressions) identified that the relevant information was not easily located when using a keyword search of “suppression” or “suppress.” Additionally, this page is not linked from other suppression-related pages, which may limit accessibility for individuals seeking this information. It is noted that a similar accessibility issue was raised in the 2022-2023 report and was promptly resolved at the time. It is unclear why this issue has recurred.

- Equifax should enhance the accessibility of the “Suppression of Credit Information” webpage by:
- Linking it directly from the “Credit File Suppression” form; and
- Updating the title tags, metadata, and keywords to ensure the page is more readily located through keyword searches (e.g., “suppression” or “suppress”)

2.14.2. **Recommendation 2 – Corrections monitoring focus**

It is recommended that Equifax prioritise its 2025 corrections monitoring and testing activities on sample testing incidents logged as mixed file corrections involving unauthorised disclosure of data. A sample of closed incidents should be reviewed to confirm that:

- the underlying mixing issue was fully resolved,
- escalation processes were applied where appropriate, and
- consideration was given to whether the incident should have been classified as causing, or likely to cause, serious harm and escalated accordingly.

2.15. The Independent Person concluded that, in relation to the Reporting Period, there was sufficient evidence that Equifax complied with the obligations of the Code relating to the following:

Policies, procedures, controls and subscriber agreements

2.15.1. Equifax maintains a comprehensive suite of documented policies, procedures, and controls that give effect to the requirements of the Code. A structured review cycle is in place for all documents, with clear ownership and responsibilities. Staff understand their obligations under the Code and demonstrate awareness of its importance.

Monitoring of policies, procedures, controls, and subscriber agreements

2.15.2. Equifax has monitoring processes in place across the three lines of defence to ensure compliance with the Code. Equifax’s internal control framework is supported by first-line QA, peer and manager oversight, second-line compliance monitoring and testing, and third-line internal audit. Automated checks, incident management, corrective action tracking, and global security safeguards further strengthen oversight. A culture of continuous improvement underpins these activities.

2.15.3. At the first line of defence, monitoring is carried out through manager and team leader oversight, supported by peer reviews. A comprehensive Quality Assurance (QA) program employs a risk-based approach, focusing on high-risk activities, including those involving new starters, new or amended processes, audit outcomes, and customer feedback.

- 2.15.4. QA collaborates closely with managers and team leaders, holding monthly calibration sessions to ensure consistency in assessments. In 2025, QA extended its scope to include monitoring of robotic process automation, with all sampled cases found to be correctly actioned. QA also introduced “gamification” in quality feedback to drive staff engagement and foster a balanced quality culture.
- 2.15.5. The Equifax regional Compliance Team underwent a significant review in 2024, including a restructure and reallocation of compliance activity priorities. As a result, some monitoring and testing activities planned for Q4 2024, including reviews of complaints and corrections, have been deferred to Q4 2025.
- 2.15.6. A Head of Privacy for Australia and New Zealand has been appointed with oversight of Code compliance, supported locally by the Head of Legal NZ. Furthermore, the revised Compliance and Risk team structure supports collaboration between roles and tasks, with all team members now involved across the full range of second-line compliance and operational risk activities rather than being confined to specialist roles. This model reduces reliance on individual staff, provides broader coverage of compliance monitoring, and strengthens resilience against future gaps.

Actions taken on deficiencies identified.

- 2.15.7. Over the period, where Equifax identified a breach or issue through monitoring, reviews, or complaints and corrections requests, it investigated and took prompt remedial action. Mechanisms supporting this include the Compliance Incident Reporting Tool, the Corrective Actions Register, and established policies and procedures for managing incidents and breaches.
- 2.15.8. Two incidents of mixed file cases were escalated to formal complaints: one was self-reported to the OPC and closed in February 2025, and the second was under review at the time of reporting.
- 2.15.9. There is reasonable assurance that Equifax responded appropriately to identified deficiencies. One recommendation was raised, suggesting that Equifax prioritise its 2025 monitoring and testing on sample testing closed mixed file incidents to confirm resolution, escalation, and assessment of serious harm.
- 2.15.10. No recommendations were carried forward from the 2023–2024 report.

3. Summary of Assurances

- 3.1. This section contains a summary of the assurances required under the Code with a response from Equifax and the findings of the Independent Person.

Schedule 7, Section 1 Assurances Process of review and reporting

Expectation per the Code	Equifax Assurance Response
<p>a. The report must include a summary of the systematic review process and the methodology followed by the reviewer.</p>	<p>Refer to paragraphs 2.1 to 2.3 of this Assurance Report which outlines the assurance and review process and methodology followed by Equifax. The Independent Person's review process is outlined in paragraph 2.12 of this Assurance Report.</p>
<p>b. The report must include a statement identifying the members of the review committee, including the independent person.</p>	<p>Refer to paragraph 2.5 of this Assurance Report which identifies the members of the review committee along with the Independent Person from INFO by Design Limited.</p>
<p>c. The report must include a statement from the Independent Person confirming their independence, summarising their expertise and outlining their involvement with the assurance process and preparation of the report.</p>	<p>Refer to paragraphs 2.11 of this Assurance Report which notes a confirmation from the Independent Person confirming their independence, a summary of their expertise, as well as outlining the assurance process including the involvement of the Independent Person.</p>
<p>d. The report must include a confirmation that the independent person is not an employee, director, or owner of the credit reporter.</p>	<p>Refer to paragraph 2.10 of this Assurance Report which notes that the Independent Person is not an employee, director, or owner of the credit reporter.</p>

Schedule 7, Section 2 Assurances

3.2. This section contains an exact summary of the findings of the Independent Person relating to policies, procedures, controls and subscriber agreements.

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>a. In relation to the applicable period, Equifax had policies in place that give effect to the requirements of the code;</p>	<p>For the period, Equifax maintained a suite of global and regional (Australia/New Zealand) policies that give effect to the requirements of the Code. Policy ownership is documented in the Obligations Register, and obligation/control owners are required to attest regularly to the currency of processes and to confirm any changes. Oversight of the policy framework is exercised by the RCSC Policy Sub-Committee, which maintains the Policy Review Schedule and reviews and approves updates to relevant local policies. Evidence of the Obligations Register and PSC meeting papers was sighted, confirming that this framework remains in place and effective during the period under review.</p>	<p>There is reasonable assurance that Equifax has policies in place that give effect to the requirements of the code. No recommendations have been made.</p>
<p>b. In relation to the applicable period, Equifax had policies in place to ensure that any arrangement with a related company accords with clause 4(2) of this code;</p>	<p>There are no changes from the prior year's report. Equifax operates five entities in New Zealand, of which four are holding companies and one, Equifax New Zealand Information Services and Solutions Limited, is the primary operating entity. In line with the requirement that Equifax has policies in place giving effect to the Code, the policy framework, comprising both global and regional (Australia/New Zealand) policies, applies across all entities in the region.</p>	<p>There is reasonable assurance that Equifax has policies in place to ensure that any arrangement with a related company accords with clause 4(2) of the code. No recommendations have been made.</p>
<p>c. In relation to the applicable period, Equifax had internal procedures and controls in place to give effect</p>	<p>For the applicable period, Equifax maintained internal procedures and controls that give effect to its policies and the requirements of the Code. Evidence provided confirms that these procedures</p>	<p>There is reasonable assurance that Equifax has internal procedures and controls in place to give effect to the policies and requirements of the code.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>to the policies and requirements of the code;</p>	<p>and controls were in place and operating during the review period.</p> <p>Key elements include:</p> <ul style="list-style-type: none"> ● Compliance Oversight: A privacy compliance program operates across the region, with a New Zealand-specific version in draft and due to be finalised before the end of 2025. ● Governance and Attestation: Obligations and control ownership are documented, with quarterly attestations undertaken by the Compliance function. This process has been updated to reflect changes in team responsibilities. ● Documented Processes: Equifax maintains process and procedure documentation relevant to New Zealand operations. ● Training and Awareness: Organisation-wide onboarding and annual training are delivered, supplemented by team-specific and ad hoc training in response to identified issues. Evidence sighted confirms training delivery. ● Assurance and Review: Controls are subject to first-line quality assurance, peer review, and manager oversight; second-line compliance monitoring and testing; and third-line internal audit. ● System and Security Controls: Automated checks and error messages are in place, supported by a range of global security controls. Errors are investigated and resolved. ● Incident Management: Incidents and breaches are recorded and overseen through a structured management process, including corrective actions. ● Continuous Improvement: Processes and controls are updated when issues are identified. 	<p>No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>d. In relation to the applicable period, Equifax had 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 their 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;</p>	<p>For the applicable period, Equifax maintained procedures to ensure that access requests under Rule 6 are received only by the individual concerned or, where applicable, their properly authorised agent. Evidence provided confirms that these procedures are documented, consistently applied, and supported by staff training.</p> <p>There are no changes to these controls from the previous year's report.</p> <p>Access request controls include:</p> <ul style="list-style-type: none"> • Verification of identity and contact details. • A third-party privacy waiver process which allows for sharing with authorised agents or denying a request based on a lack of authorisation. • Automated processing via robotic process automation (RPA), which verifies requirements and generates encrypted credit reports. Passwords are sent separately to requestors. Error messages are monitored, investigated, and resolved. • Comprehensive written procedures, supported by on-the-job and ongoing training for Customer Services staff. <p>Safeguards against bundled authorisations include:</p> <ul style="list-style-type: none"> • Consumer information provided for a credit file request may only be used for updating the file where specific consent is obtained, and such consent cannot be bundled with other services. • Privacy impact assessments are required for new use requests. • Subscriber agreements include terms and conditions that explicitly prohibit the use of information for marketing or direct marketing. 	<p>There is reasonable assurance that Equifax had 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 their agent.</p> <p>No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	<ul style="list-style-type: none"> Internal review and system controls reject bundled or multiple requests that may circumvent Code requirements. 	
<p>e. In relation to the applicable period, Equifax provided information and training to its staff to ensure compliance with the policies, procedures and controls;</p>	<p>For the applicable period, Equifax provided information and training to staff to support compliance with policies, procedures, and controls. Evidence provided confirms that training was delivered as planned, with records maintained and non-completion escalated.</p> <p>Mandatory training</p> <ul style="list-style-type: none"> Onboarding training is required for all staff and contractors, covering Privacy 101 and Credit Reporting 101. Compliance 101 provides an overview of compliance concepts and obligations. Annual mandatory global compliance training was held in October 2024, including Credit Reporting 101 for New Zealand staff. A refresh of Privacy 101 is scheduled for October 2025. Due to global scheduling, compliance training is delivered in a single annual window. Training records are maintained, and instances of non-completion are escalated. Privacy 101 and Credit Reporting 101 content are scheduled for review in the second half of 2025. <p>Business unit and role-specific training</p> <ul style="list-style-type: none"> Consumer Bureau Operations training provides comprehensive on-the-job training, coaching, and performance management. Staff are assessed for competency on individual tasks before performing them independently. Documented materials and weekly issue-discussion meetings support training. 	<p>There is reasonable assurance that Equifax provided information and training to its staff to ensure compliance with the policies, procedures and controls.</p> <p>No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	<p>Awareness resources and initiatives</p> <ul style="list-style-type: none"> • Staff have access to resources such as the Privacy Toolkit intranet page and receive regular broadcasts and emails. • Equifax promoted privacy awareness through Privacy Week in May 2025, including awareness activities and a privacy quiz competition. 	
<p>f. In relation to the applicable period, Equifax ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information;</p>	<p>For the applicable period, evidence provided, including sample testing of five new subscriber agreements, confirms that agreements compliant with Schedule 3 were in place before Equifax disclosed credit information.</p> <p>Equifax’s onboarding framework ensures that no subscriber can access credit information without first meeting prescribed requirements. Key elements include:</p> <ul style="list-style-type: none"> • Policy: The Equifax NZ Subscription Policy sets out the criteria for onboarding, including the conditions under which an organisation may be granted or refused access to the NZ Credit Bureau. • Process: The Equifax NZ Subscription Process Document details the steps for onboarding and the key approval guidelines. • Review and Oversight: Staff are required to review new subscriber applications and follow up with applicants on any incorrect or missing information. Oversight is exercised by Team Leaders/Managers, who approve or decline new applications in line with established criteria. • System Controls: Automated system controls prevent subscribers from accessing credit information until all 	<p>There is reasonable assurance that subscriber agreements were in place before disclosing credit information.</p> <p>No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	requirements have been met.	
g. In relation to the applicable period, Equifax ensured that access arrangements under Schedule 4 were in place before disclosing credit information.	<p>For the applicable period, evidence provided confirms that Equifax ensured access arrangements under Schedule 4 were in place before disclosing credit information. No changes were identified from the previous year's report.</p> <p>As noted in section f (Subscriber Agreements), Equifax's subscriber onboarding policy, process, and systems prevent access to credit information unless the prescribed criteria are met. This requirement applies equally to all subscribers, including intelligence and security agencies.</p>	<p>There is reasonable assurance that Equifax ensured that access arrangements under Schedule 4 (Access Agreement) were in place before disclosing credit information.</p> <p>No recommendations have been made.</p>

Schedule 7, Section 3 Assurances

3.3. This section contains an exact summary of the findings of the Independent Person relating to monitoring of policies, procedures, controls, and subscriber agreements

Expectation per the Code	Findings of the Independent Reviewer	Assurances
a. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax followed its own policies, procedures and controls;	<p>For the applicable period, evidence sighted confirms that Equifax undertook monitoring activities to ensure compliance with its own policies, procedures, and controls. Monitoring activities operate across the three lines of defence, supported by additional assurance processes.</p> <ul style="list-style-type: none"> • First line: Oversight is exercised by managers and team leaders, supported by peer reviews. The Quality Assurance (QA) program applies a risk-based approach and works collaboratively with managers and team leaders. Monthly 	<p>There is reasonable assurance that Equifax undertook monitoring activities, with the exception of the second-line monitoring activities noted below, to ensure reasonable compliance with the code, including that it followed its own policies, procedures and controls.</p> <p>No recommendations have been made; however, it is noted that some planned monitoring activities were not completed during the period due in part to</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	<p>calibration sessions are held to promote consistency in assessments. In 2025, QA introduced monitoring of Robot processes to confirm that robotic process automation was functioning as expected, with 100% of sampled cases actioned correctly. QA also introduced “gamification” in quality feedback to improve staff engagement and reinforce a balanced quality culture.</p> <ul style="list-style-type: none"> ● Second line: Equifax’s Compliance Management Program undertakes monitoring and testing to assess regulatory compliance risks, test controls, and provide reporting to management. During the 2024–2025 period, the departure of key monitoring and testing staff resulted in the planned testing for Q4 2024 on complaints, corrections, and default deletions not being completed. Equifax made a risk-based decision to reprioritise these reviews. This testing has been rescheduled for Q4 2025 under the new team structure. ● Third line: Internal Audit provides additional independent assurance. <p>Additional assurance activities include:</p> <ul style="list-style-type: none"> ● Systems checks and exception reporting. ● Risk management processes. ● Breach and incident reporting, with resolution tracked through the Corrective Actions Register and Compliance Incident Reporting Tool. ● Identification of systemic or one-off issues through escalation by the Head of Legal NZ or the Compliance Team. ● Compliance attestation processes. 	<p>staffing constraints and reprioritisation of these reviews. These include:</p> <ul style="list-style-type: none"> ● Complaints ● Corrections ● Default deletions <p>Equifax has advised that this monitoring has been rescheduled and will be completed in Q4 2025 under the new team structure.</p>
b. In relation to the applicable period,	For the applicable period, evidence provided confirms that	There is reasonable assurance that Equifax

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that the information held by Equifax was protected by reasonable security safeguards;</p>	<p>Equifax undertook monitoring activities to ensure that information held was protected by reasonable security safeguards.</p> <p>As with last year’s report, the scope of the Independent Review did not include a security audit or technical penetration testing. However, based on the documentation reviewed, the security framework appears robust.</p> <ul style="list-style-type: none"> ● Information Security Program: Equifax in New Zealand operates under parent company Equifax Inc.’s Information Security Program, which includes policies and a range of technical, administrative, and physical safeguards. The AU/NZ regional security team is part of the global information security function. ● Certification: Equifax Inc. maintains ISO/IEC 27001 certification for its Information Security Management System. ● Incident monitoring: Security incidents are monitored in real time and addressed under Equifax’s global Technology/Security Incident Communication Procedures. ● Awareness: In New Zealand, staff KPIs include a security awareness component, reinforcing individual responsibility for following security requirements. ● Local monitoring: A review of all logged incidents for the period did not identify any significant security issues. IT-related issues were resolved promptly. 	<p>undertook monitoring activities to ensure they were protected by reasonable security safeguards.</p> <p>No recommendations have been made.</p>
<p>c. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable</p>	<p>For the applicable period, evidence provided confirms that Equifax undertook monitoring activities to ensure that information privacy requests were processed in accordance with</p>	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>compliance with the code, including that Equifax processed information privacy requests in accordance with rules 6 and 7;</p>	<p>Rules 6 and 7. There were no changes from last year’s report. Equifax maintains documented processes and system controls to support consumer access to credit information and the correction of credit information. Consumers are provided with explanatory documentation about their credit report and rights.</p> <p>Monitoring activities include:</p> <ul style="list-style-type: none"> ● Training and oversight: Staff handling access and correction requests receive comprehensive training. Where training needs are identified through peer review, QA evaluations, live call monitoring, or system error logs, targeted coaching is provided. ● System and manual processing: Credit report requests are primarily processed overnight through automated systems. Exceptions are handled manually by customer service agents, with error logs generated for any issues, which are then resolved by staff. ● Timeliness controls: Systems controls ensure access and correction requests are completed within required timeframes, supplemented by manual monitoring where necessary. ● Management reporting: Monthly statistics, including correction requests and complaint-related activity, are reported to management for review. <p>A sample of nine requests for credit reports, selected across the review period, was tested. All requests were processed correctly.</p>	<p>Equifax processed information privacy requests in accordance with rules 6 and 7.</p> <p>No recommendations have been made.</p>
<p>d. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable</p>	<p>For the applicable period, evidence provided confirms that Equifax has several measures in place to, as far as reasonably practicable, avoid the incorrect matching of information held.</p>	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure that it took measures as were reasonably practicable to</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>compliance with the code, including that Equifax took such measures as were reasonably practicable to avoid the incorrect matching of information held by Equifax;</p>	<p>Controls and monitoring</p> <ul style="list-style-type: none"> • Equifax uses a matching algorithm designed to minimise incorrect matching of data. • Customer Services staff are trained to identify incorrect matching and resolve issues through the correction process. • Matching accuracy is reported monthly to management. <p>Projects and initiatives</p> <ul style="list-style-type: none"> • In July 2024, Equifax implemented the first phase of a project aimed at reducing mixed files for twins. This phase addressed male/female twins; however, same-sex twins continue to present matching challenges, particularly where credit providers use undisclosed or non-binary gender codes. The project has been temporarily paused until 2026. • In 2025, Equifax commenced further work to enhance its data foundation and improve matching outcomes. Planned activities include cleansing bureau address data previously ingested in free text, enriching master files with personally identifiable information by updating them with data from CCR providers and creating links between master files belonging to the same individual to enhance downstream analytics. This work may improve matching accuracy by up to 3% by the end of 2025. <p>Mixed file incidents: During the period, 275 incidents were recorded as mixed file corrections. Two of these incidents resulted in formal complaints. For reporting purposes, a mixed file correction is logged where an unauthorised disclosure of data has occurred.</p> <p>Mixed file corrections are generally completed and closed at the point of identification. Oversight of these corrections is</p>	<p>avoid the incorrect matching of information. No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	maintained through manager and peer review processes, QA processes, and second-line monitoring and testing.	
<p>e. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that the information held by Equifax was subject to reasonable checks to ensure that it was accurate, up-to-date, complete, relevant and not misleading;</p>	<p>For the applicable period, evidence provided confirms that Equifax undertook monitoring activities to ensure that the information it held was accurate, up to date, complete, relevant, and not misleading, in accordance with the Code. There were no changes from last year's report.</p> <p>Activities in place include:</p> <ul style="list-style-type: none"> ● Data ingestion standards and controls: Subscriber agreements require data to meet quality, accuracy, completeness, and timeliness standards. Data is checked prior to import, with pre-ingestion thresholds in place to detect anomalies. Where thresholds are breached, investigations are conducted and escalated to account managers where relevant. ● Retention and purging: Information is subject to automated purging in line with retention requirements under the Code. ● Matching logic: Logic reviews are undertaken to improve the accuracy of information matching. ● Continuous improvement: Areas for improvement are identified and addressed. ● Corrections: Processes are in place for both provider- and consumer-initiated corrections, supported by reporting of statistics to identify issues. A sample of four corrections was reviewed; no issues were identified. ● Default deletions: Processes exist for both bulk and single deletions, enabling the removal or amendment of defaults. Planned monitoring of default deletions during the period was not completed in part due to the departure of key monitoring 	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure reasonable compliance with the code, with the exception of the second-line monitoring activity noted below, including that the information held by Equifax was subject to reasonable checks to ensure that it was accurate, up-to-date, complete, relevant and not misleading.</p> <p>No recommendations have been made; however, it is noted that some planned monitoring activities were not completed during the period, due in part to staffing constraints and reprioritisation due to the level of risk involved (an "internal concern" rather than a higher risk activity), including default deletions monitoring.</p> <p>Equifax has advised that this monitoring has been rescheduled and will be completed in Q4 2025 under the new team structure.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	<p>and testing staff and the decision to reprioritise the review on the basis that it was planned due to an “internal concern” rather than a higher risk activity, but is planned for Q4 2025.</p> <ul style="list-style-type: none"> • Timeliness monitoring: Files from credit providers are expected within agreed timeframes. Tracking processes identify delays, which are subject to escalation. Evidence from a review of data ingestion “data supply tracking” incidents demonstrated a proactive approach from data analysts, including timely follow-up with credit providers where files were late or not of the expected size. 	
<p>f. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax’s reporting and retention of credit information was in accordance with Rule 9 and Schedule 1;</p>	<p>For the applicable period, evidence provided, including a review of 12 months of purge logs, confirms that Equifax undertook monitoring activities to ensure compliance with Rule 9 and Schedule 1 in relation to reporting and retention of credit information. There are no changes from last year’s report.</p> <p>Monitoring and controls in place include:</p> <ul style="list-style-type: none"> • System-embedded retention rules: Retention periods are built into systems through automated purging. Once data is purged, it cannot be retrieved, although a deletion log is maintained for reference. • Retention register: The NZ Record Retention Register documents the applicable purge rules. • Error monitoring: Error logs are generated where failures or issues occur. These logs are investigated and resolved promptly. • Global oversight: Retention and deletion processes are also governed by Equifax’s Global Retention Policy, providing 	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure compliance with the Code, including that the reporting and retention of credit information was in accordance with Rule 9 and Schedule 1. No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	additional oversight and consistency.	
<p>g. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed direct marketing lists in accordance with Schedule 10;</p>	<p>There is evidence that Equifax monitored the processing of direct marketing lists appropriately. There are no changes from last year's report.</p> <p>Controls are in place to ensure that requests are only processed when received from approved subscribers who have signed both a Marketing Services Customer Agreement and a Statement of Work. Processing occurs only when defined criteria are met, with compliance monitored and requirements explicitly communicated to subscribers.</p> <p>Monitoring controls include automated checking of request criteria and automated processing to ensure that only eligible lists are actioned.</p>	<p>There is reasonable assurance that Equifax undertook reasonable monitoring activities to ensure direct marketing lists are processed in accordance with Schedule 10.</p> <p>No recommendations have been made.</p>
<p>h. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed suppression, release or cancellation requests in accordance with Schedule 8;</p>	<p>For the applicable period, evidence provided confirms that Equifax monitored suppression, release, and cancellation requests in accordance with Schedule 8. Documented processes set out how suppressions are applied, and how release or cancellation requests are managed. There were no changes to the credit suppression process from last year's report.</p> <p>Mechanisms in place include:</p> <ul style="list-style-type: none"> ● Timeliness: Suppressions are normally completed on the day of request, with the Customer Services team monitoring requests throughout the day. ● Automation: Most suppression requests are processed overnight by the Robot. Error logs are generated where issues occur, and these are monitored to ensure corrections and 	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed suppression, release or cancellation requests in accordance with Schedule 8.</p> <p>No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	<p>completion of required communications (including emails with PINs).</p> <ul style="list-style-type: none"> • Manual processing: Where automated processing is not possible (e.g., name field length issues), requests are processed manually by Customer Services staff. • System controls and monitoring: System checks monitor extension timeframes, supported by manual oversight. • Release and cancellation: Requests for release or cancellation of a suppression are closely monitored. • Management oversight and quality assurance: Manager and Team Leader reviews are conducted over random samples each month. Additionally, QA assessments are conducted. <p>A sample of 10 suppressions was tested during this review. Of these, one exception was identified where the Robot did not process a request on 2 January 2025. This issue was detected by the Customer Service Manager on 3 January and addressed by the technical team in the early hours of 4 January. The suppression was completed that day. This demonstrated that monitoring controls were effective in detecting and resolving the issue, although the identification was delayed due to reduced holiday staffing.</p>	
<p>i. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax processed complaints in accordance with Clause 7;</p>	<p>For the applicable period, evidence provided confirms that Equifax undertook monitoring activities to ensure complaints were processed in accordance with Clause 7 of the Code.</p> <p>Processes and monitoring</p> <ul style="list-style-type: none"> • Complaints are recorded in ServiceNow, with timeframes monitored and monthly reports provided to Customer 	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure reasonable compliance with the code, with the exception of the second-line monitoring activities noted below, that Equifax processed complaints in accordance with clause 7.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	<p>Services management. Escalated correction requests are also treated as complaints.</p> <ul style="list-style-type: none"> Complaints that qualify as incidents are reported through the Compliance Incident Reporting Tool, which tracks resolution and ensures quarterly reporting to the RCSC. Where appropriate, privacy-related complaints are escalated to the Head of Legal NZ for oversight and support. Acknowledgement, progress, and outcome communications are sent within prescribed timeframes. The Summary of Rights is included in acknowledgement letters/emails, and Customer Services monitors compliance with these requirements. <p>Planned review</p> <p>A review of New Zealand complaints, initially planned for Q4 2024, did not proceed due to the departure of key monitoring and testing staff. This review has been rescheduled for Q4 2025 under the new team structure.</p> <p>Summary of complaints during the period</p> <ul style="list-style-type: none"> In Q4 2024, Equifax self-reported a mixed file complaint to the Office of the Privacy Commissioner (OPC) involving a consumer with a common name who had previously experienced a similar issue in 2018. Equifax complied with OPC requirements, and the incident was closed in February 2025. In Q1 2025, a second consumer raised a complaint regarding a twin mixed file. The file was corrected and an updated credit report issued. The consumer expressed dissatisfaction, and at the time of reporting Equifax was awaiting further response. If no reply is received, the case will be closed in accordance with standard processes. 	<p>No recommendations have been made; however, it is noted that some planned monitoring activities were not completed during the period due to staffing constraints, including complaints monitoring.</p> <p>Equifax has advised that this monitoring has been rescheduled and will be completed in Q4 2025 under the new team structure.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>j. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax’s 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;</p>	<p>Equifax has processes in place to ensure that its 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. Responsibility for Code-related website content rests with the Head of Legal, New Zealand, who is accountable for updating and approving changes. Any amendments are subject to formal sign-off. Additionally, the Head of Legal conducts an annual review of the website to ensure that the required information remains accurate and visible. The next scheduled review is planned for the second half of 2025.</p> <p>During this review, it was noted that information required under clause 8.1, published at https://www.mycreditfile.co.nz/suppression-credit-information, was not easily located when using a keyword search of “suppression” or “suppress.” Additionally, this page is not linked from other suppression-related pages, which may limit accessibility for individuals seeking this information. It is noted that a similar accessibility issue was raised in the 2022-2023 report and was promptly resolved at the time. It is unclear why this issue has recurred.</p>	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that Equifax’s 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.</p> <p>It is recommended that Equifax enhance the accessibility of the “Suppression of Credit Information” webpage by:</p> <ul style="list-style-type: none"> ● Linking it directly from the “Credit File Suppression” form; and ● Updating the title tags, metadata, and keywords to ensure the page is more readily located through keyword searches (e.g., “suppression” or “suppress”).
<p>k. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that subscribers complied with agreements and controls;</p>	<p>For the applicable period, evidence provided confirms that Equifax undertook monitoring activities to ensure that subscribers complied with agreements and controls.</p> <ul style="list-style-type: none"> ● Subscriber obligations are clearly communicated, including the requirement to cooperate with monitoring. Equifax conducts both automated and ad hoc compliance monitoring and addresses identified non-compliance promptly, including the option to suspend subscriber accounts. 	<p>There is reasonable assurance that Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that subscribers complied with agreements and controls. No recommendations have been made.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
	<ul style="list-style-type: none"> • Corrective actions: Where findings were identified, remedial actions were agreed with relevant managers, documented in the corrective actions register, and tracked through to completion. • Subscriber consent review: The Compliance Team conducted a review of ten subscribers during the period. Eight subscribers were found compliant, one was required to revise its terms and conditions, and one had not yet responded at the time of reporting. The Compliance Team is following up on the outstanding response. • Future assurance activities: In addition to ongoing management oversight of the subscription process, quality assurance over this process is scheduled to commence in Q3 2025. 	
<p>l. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including that the intelligence and security agencies complied with any access arrangements and controls;</p>	<p>Intelligence and security agencies are subject to the same controls and reviews as other subscribers. This is outlined in the standard agreement held with the SIS. There is no change from last year's report.</p> <p>It was not clear whether the SIS was selected as part of the random sample for the subscriber review conducted in the first half of 2025. As in prior years, the review involved random selection from a complete list of all New Zealand subscribers, which includes the SIS.</p>	<p>There is reasonable assurance that Equifax undertook reasonable monitoring activities to ensure the intelligence and security agencies complied with any access arrangements and controls.</p> <p>No recommendations have been made.</p>
<p>m. In relation to the applicable period, Equifax undertook monitoring activities to ensure reasonable compliance with the code, including</p>	<p>For the applicable period, evidence provided confirms that Equifax undertook monitoring activities to ensure that tracing activities under Schedule 11 were conducted in compliance with the Code. There is no material change from last year's report.</p>	<p>There is reasonable assurance that the requirements under Schedule 11 in relation to tracing individuals were met.</p>

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>that the requirements on both the subscribers and the credit reporter under Schedule 11 in relation to tracing individuals were met.</p>	<p>Requests under Schedule 11 are managed through the “eTrace & Address Hygiene for the Return of Money Owed” process. Compliance requirements are embedded in a statement of work that must be agreed and signed by the customer before any tracing activity is undertaken.</p> <p>Actions to ensure compliance include:</p> <ul style="list-style-type: none"> • Pre-screening of requests before processing. • Subscriber obligations defined through specific terms and conditions. • Privacy impact assessments for newly acquired datasets. • System-based suppression process that flows automatically through Equifax systems to prevent inconsistencies. 	<p>No recommendations have been made.</p>

Schedule 7, Section 4 Assurances

3.4. This section contains an exact summary of the findings of the Independent Person relating to an action taken on deficiencies identified

Expectation per the Code	Findings of the Independent Reviewer	Assurances
<p>a. In relation to the applicable period, where, during its systematic reviews, monitoring activities or as a result of a complaint, Equifax identified a breach of an agreement, policy, procedures, control, or requirement of the code, Equifax investigated that breach and, where appropriate, took prompt remedial action</p>	<p>For the applicable period, evidence provided confirms that where breaches of agreements, policies, procedures, controls, or Code requirements were identified, whether through systematic reviews, monitoring activities, or complaints, Equifax investigated the breach and, where appropriate, took prompt remedial action. No significant breaches were identified during the period. Supporting arrangements include:</p> <ul style="list-style-type: none"> ● Incident management: Incidents are reported through the Compliance Incident Reporting Tool. Root cause analysis is undertaken, and remedial actions are implemented to address deficiencies. Incidents are tracked to completion and reported quarterly to the RCSC. ● Corrective actions: Recommendations arising from audits, compliance testing, and investigations are recorded in the Corrective Actions Register, which tracks progress and completion. ● Policy framework: Policies and procedures are in place to support the identification, reporting, investigation, and resolution of incidents and breaches. <p>Two hundred seventy-six (276) incidents were reported through the Compliance Incident Reporting Tool. Of the 276 incidents, 275 related to mixed file corrections, which, as of 1 April, are no longer recorded through the Compliance Incident Reporting Tool. One incident was not related to mixed files. It is noted that one compliance incident is low, given the nature of Equifax's business.</p>	<p>There is reasonable assurance that where, during its systematic reviews, monitoring activities or as a result of a complaint, the credit reporter identified a breach of an agreement, policy, procedures, control, or requirement of the code, the credit reporter investigated that breach and, where appropriate, took prompt remedial action.</p> <p>It is recommended that Equifax prioritise its 2025 corrections monitoring and testing activities on sample testing incidents logged as mixed file corrections involving unauthorised disclosure of data. A sample of closed incidents should be reviewed to confirm that:</p> <ul style="list-style-type: none"> ● the underlying mixing issue was fully resolved, ● escalation processes were applied where appropriate, and ● consideration was given to whether the incident should have been classified as causing, or likely to cause, serious harm and escalated accordingly.

	<p>However, the Independent Reviewer has not determined that this number represents under-reporting, and Equifax is confident that it is capturing all compliance incidents for the New Zealand business.</p> <p>Mixed File Incidents: For recording purposes, a mixed file correction is logged where there has been an unauthorised disclosure of data.</p> <p>From 1 April 2025, the recording of mixed file corrections transitioned to ServiceNow, with data extracted as separate reporting rather than through the Compliance Incident Reporting Tool. This change was introduced to improve reporting efficiency while maintaining the integrity of data for reporting purposes. Mixed file corrections assessed as likely to cause, or that have caused, serious harm continue to be reported through the Compliance Incident Reporting Tool.</p> <p>Mixed file corrections are generally completed and closed at the point of identification. Equifax reported that individuals are typically satisfied with the resolution of their mixed file once it has been corrected. Oversight of these corrections is provided through manager and peer review processes, QA processes, and second-line monitoring and testing.</p> <p>In some instances, individuals raise a complaint after being notified of a mixed file error. During the period, two mixed file corrections were escalated and also recorded as complaints.</p> <ul style="list-style-type: none">• In Q4 2024, Equifax self-reported a mixed file incident to the Office of the Privacy Commissioner (OPC) involving a consumer with a common first and last name who had previously experienced a mixed file in 2018. At that time, the consumer had been assured that the issue would not recur; however, in 2024 their file was again mixed, this time with a	
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	<p>different individual of the same name.</p> <p>Equifax reported the matter to the OPC, which requested assurances that the mixing issue had been resolved and directed Equifax to notify the other individual whose information had been mixed with the complainant's. Equifax complied with these requests, and the incident was closed in February 2025.</p> <ul style="list-style-type: none"> • In Q1 2025, a second consumer raised a complaint about a twin mixed file. Equifax corrected the mixed file and provided the consumer with an updated credit file. The consumer expressed dissatisfaction with the incident, and Equifax responded. At the time of reporting, Equifax was awaiting further reply from the consumer. In line with Equifax's processes, if no further response is received, the case will be closed. 	
<p>b. In relation to the applicable period, where a deficiency was identified in the previous year's report, Equifax, where appropriate, took prompt remedial action</p>	<p>There were no recommendations or opportunities identified in the 2023 – 2024 report.</p>	<p>N/A</p>

Appendix A

Independence Statement – Michelle Olbricht

I am Michelle Olbricht, a consultant with INFO by Design since 2022.

As required by Clause 8 of the Credit Reporting Privacy Code 2020, I confirm that I am not an employee, director, or owner of Equifax, and I have not provided any services or consulting advice to Equifax other than in my capacity as the Independent Person. This is the third year I have undertaken this role for Equifax, and as part of the 2025 process, Equifax reminded me of my responsibilities as the Independent Person.

I hold a Bachelor of Laws from Victoria University of Wellington and have worked as a professional advisor in privacy, compliance, and operational risk since 2006. My career began in the financial services sector before expanding into both the public and private sectors. Earlier in my career, I also managed operational teams, providing first-line experience and a practical understanding of the challenges faced by businesses.

My previous roles include leading the compliance function at Rabobank New Zealand Limited, where I also served as the Privacy Officer, and heading the risk and compliance team at the Earthquake Commission (now the Natural Hazards Commission), where I held responsibility as the Privacy Officer. Before joining INFO by Design, I spent four years as a Senior Manager at KPMG New Zealand, where I led the privacy service offering, advised a wide range of organisations, and undertook and oversaw numerous assurance reviews. Since joining INFO by Design, I have continued to provide privacy advice and guidance to both public and private sector organisations.

My involvement in the 2025 reporting process included:

- Reviewing documentation provided by Equifax
- Conducting interviews with key staff
- Assessing policies, processes, and controls through document review, interviews, walk-throughs, and sample testing against the requirements of the Code
- Undertaking risk assessments where evidence of compliance was not provided or opportunities for improvement were identified, with recommendations based on the likelihood of non-compliance
- Conducting walk-throughs and process analyses for new subscriber onboarding, access requests, and requests for corrections/complaints
- Attending Equifax OPC Assurance Committee meetings, as required
- Preparing a draft report for review, discussion, and acceptance by the OPC Assurance Committee.

Dated 1 September 2025

Michelle Olbricht

Michelle Olbricht
Consultant, INFO by Design