Complaints management policy

(ACN: 657 630 094)

1. Introduction

1.1. Circular Now (Australia) Pty Ltd (ACN 657 630 094) ("Circular, we, our or us") is committed to effective and efficient complaints management and to operate in a fair and transparent manner.

1.2. A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

1.3. Circular's complaints management process is described below.

1.4. Any information that you require relating to the complaints management process will be provided to you free of charge.

2. Our complaints management process

2.1. We take your feedback seriously and will investigate, assess and respond to any complaints. If you have a complaint, please contact us by:
(a) Email: feedback.au@nowcircular.com;
(b) Phone: 1300 310 927.

2.2. When you make a complaint, please provide us with the following information to help us to investigate and respond to your complaint effectively and efficiently:
(a) Your name;
(b) Your contact details;
(c) How you would prefer to be contacted;
(d) A description of your complaint; and
(e) How you would like the complaint resolved.

2.3. We will acknowledge your complaint, generally within one (1) business day, during which we will inform you of how you contact Circular in relation to your Complaint.

2.4. We may require further information from you to help us to investigate and respond to your complaint. Where this is the case, we will contact you and explain what information we need and why we need it.

2.5. We will keep you informed regarding our investigation into your complaint.

2.6. After completing our investigation, we will provide you with:
(a) Our response to your complaint; and
(b) Your right to refer your complaint to the Australian Financial Complaints Authority ("**AFCA**") if your complaint is not resolved to your satisfaction; and
(c) Information about how you can contact AFCA, if required.

2.7. We will provide you a written response to your complaint if:
(a) You have requested a written response;
(b) The complaint is about financial hardship assistance; or
(c) The complaint relates to credit reporting.

2.8. A complaint may relate to credit reporting matters. This includes complaints relating to:
(a) a credit enquiry or information request;
(b) consumer credit liability information;
(c) repayment history information;
(d) financial hardship information;
(e) default information;
(f) payment information;
(g) any listing with a credit reporting body;
(h) a request for correction, removal or substantiation of credit information; or
(i) any alleged breach of Part IIIA of the Privacy Act 1988 (Cth) or the Privacy (Credit Reporting) Code.

2.9. Where a complaint is identified as relating to credit reporting (either by you or during our internal assessment), it will be classified and handled as a credit reporting complaint under this policy.

2.10. Where a complaint involves a request to remove or substantiate credit information, we will investigate whether the information was collected, used and disclosed in accordance with applicable law, including the Privacy Act 1988 (Cth) and the Privacy (Credit Reporting) Code, and determine whether the information should be maintained, corrected or removed.

2.11. In investigating credit reporting complaints, we may rely on relevant records including (where available):
(a) application data and timestamps;
(b) disclosures and notices provided to you;
(c) identity verification records;
(d) credit reporting body enquiry or request records;
(e) account, payment and repayment history information;

(f) financial hardship arrangements; and
(g) communications with you or your authorised representative.

2.12. Where we determine that credit information is inaccurate, out of date, incomplete, misleading or not permitted to be disclosed, we will take reasonable steps to correct the information and notify any relevant credit reporting bodies or other recipients where required by law.

2.13. We may deal with an authorised representative (including a financial counsellor, lawyer or credit repair representative) where sufficient written authority is provided. Where authority is unclear or incomplete, we may request additional information or limit the information we disclose until authority is verified.

3. Timeframe for resolving complaints

3.1. We endeavour to resolve all complaints as quickly as practicable and we are likely to resolve many complaints within days.

3.2. However, there may be times when it takes us longer to investigate a complaint. Where this is the case, we will provide you with a response within the following timeframes:

Type of complaint	Maximum timeframe to provide a response
Complaints involving default notices	No later than twenty-one (21) calendar days after receiving the complaint.
Complaints involving requests for financial hardship assistance or a request for postponement of enforcement proceedings made.	No later than twenty-one (21) calendar days after receiving the complaint. Exceptions apply where we do not have sufficient information to make a decision or if an agreement is reached with you.
Complaints about credit reporting, including correction complaints	No later than thirty (30) calendar days after receiving the complaint.
All other complaints	No later than thirty (30) calendar days after receiving the complaint.

4. If you are unhappy with our response

4.1. If your complaint is not resolved to your satisfaction, you have the right to refer your complaint to AFCA. AFCA is an independent and external dispute resolution scheme, of which Circular is a member.

4.2. You can lodge your complaint with AFCA by sending the relevant information and documents to:

Australian Financial Complaints Authority Limited
GPO Box 3
Melbourne VIC 3001
Phone: 1800 931 678
Fax: (03) 9613 6399
Email: info@afca.org.au
Website: https://www.afca.org.au/

4.3. Where AFCA refers a complaint to us, we will use the referral period to attempt to resolve the complaint directly before providing an external dispute resolution response.

5. Accessibility services

5.1. We take our commitment to provide accessible services to customers seriously.

5.2. If you are deaf or have a hearing or speech impairment, you can contact us on the National Relay Service, a government initiative that offers an Australia-wide phone service for people who are deaf or have a hearing or speech impairment. It's available at no additional charge:

(a) Step 1: Contact us through your preferred NRS call channel detailed on NRS call numbers and links;
(b) Step 2: Provide the NRS with our phone number 1300 310 927;
(c) For more information visit: About the National Relay Service

5.3. If you require this policy in another format or language, please contact us using the details below.

6. Contact us

6.1. If you have any questions or would like further information about our complaints management process, please contact us by:
(a) Email: help_au@nowcircular.com; or
(b) Phone: 1300 310 927.