

12 October 2026



Registry Data Consultation
Australian Securities and Investments Commission

Via Email only: consultation.registrydata@asic.gov.au

Dear Sir/Madam,

RE: CP 391 – Access to information on the companies register

The Australian Collectors & Debt Buyers Association appreciates the opportunity to provide the attached Submission in response to ASIC Consultation Paper 391, Access to information on the companies register.

ACDBA supports registry modernisation and stronger protection of personal information. Our Submission explains how director information is used to verify parties, monitor changing credit risk, locate individuals and resolve unpaid accounts. We seek continued access for verified credit and recovery users through ASIC and approved information providers, with safeguards that preserve those functions and the confidence on which business credit depends.

Please do not hesitate to contact the writer to discuss any aspect of the Submission.

Yours sincerely,

Jacob Maiore
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Introduction

The Australian Collectors & Debt Buyers Association (ACDBA) welcomes this opportunity to comment on ASIC Consultation Paper 391, Access to information on the companies register (CP 391).

ACDBA was established in 2009 for the benefit of companies who collect, buy and/or sell debt. Our members (refer Appendix 1) represent the majority of the collection market in Australia and include specialist debt purchasers and contingent collection agencies operating throughout Australia.

Members purchasing regulated consumer credit contracts generally hold Australian Credit Licences, acquires the prior creditor's rights and administers the account in its own right. In a contingent collection arrangement, ownership remains with the original creditor and the agency acts on its behalf. Our members undertake account administration, credit reporting, financial hardship, dispute resolution and enforcement for accounts originating with banks, non-bank lenders, utilities, telecommunications providers and trade creditors.

ACDBA joined the Australian Credit Forum, the Australian Institute of Credit Management and the Institute of Mercantile Agents in a submission to Treasury on 13 February 2026 concerning registry reform. We supported Director ID linkage and stronger privacy protection, while seeking continued access to directors' full dates of birth and residential addresses for legitimate credit and recovery work through ASIC, credit reporting bodies and information brokers.¹

ACDBA is also participating in a joint industry letter concerning CP 391. This Submission explains how our members and the creditors they serve use director information, why the proposed general-access fields are insufficient for that work, and the business access arrangements we recommend.

Response

ACDBA supports registry modernisation, Director ID linkage and stronger protection of personal information. We do not support the proposed business access settings in their present form. The proposed business category includes registered liquidators, legal practitioners, journalists and media organisations, but omits creditors, debt purchasers and collection agencies. ASIC anticipates that Director ID-related information and service addresses could meet the needs of other business users.²

Our members need to do more than identify a company and its current directors. They must connect an individual with an agreement, investigate discrepancies, locate a person whose contact details have changed and establish the position at the time of an earlier transaction. Creditors must also be able to reassess risk as the people and circumstances behind an account change. Full dates of birth, residential addresses and relevant historical information support that work. The proposed general-access information does not preserve those functions.

ACDBA recommends that verified creditors, debt purchasers, collection and servicing agencies, and their authorised service providers be expressly included in business access, with both full dates of birth and residential addresses available for legitimate credit and recovery purposes. That access should extend to relevant historical information and operate directly through ASIC and through approved information providers.

Why members need the information

A collection agency commonly becomes involved after an account is overdue and the creditor's own efforts have not resolved it. The referral may contain invoices, a credit application, a guarantee and earlier correspondence. The agency must work out who entered the transaction, the basis of the claim, who should be contacted and whether the information supplied remains current. A debt purchaser undertakes comparable work when assessing and administering purchased accounts.³

¹ Australian Collectors & Debt Buyers Association, Australian Credit Forum, Australian Institute of Credit Management and Institute of Mercantile Agents, Registry stabilisation and uplift – draft legislation consultation (13 February 2026), pp 1–6, available at <https://acdba.com/submissions/>.

² ASIC, CP 391: Access to information on the companies register (11 September 2026), Table 2, p 8, and "Business access", p 12.

³ ACDBA and other industry bodies, Registry stabilisation and uplift – draft legislation consultation (13 February 2026), pp 9–12, "Examples".

At that stage, the company may have changed directors, ceased trading from its former premises or stopped responding. A guarantor's details may be several years old. Registry information enables the agency or purchaser to check the original records against an independent source. An officeholder may need to be contacted on the company's behalf; a person who gave a guarantee may also need to be contacted about that separate obligation. The search helps establish the relevant person and capacity before a demand or legal referral.

Connecting the individual with the company record

A company name and ACN identify the legal entity. The separate task is to establish that the individual dealing with the creditor is the director recorded against it. This matters when a person signs an agreement, gives a guarantee, seeks access to account information or negotiates on the company's behalf.

For example, a supplier opening a company credit account may obtain a director's guarantee and identification showing the signatory's name, date of birth and residential address. Comparing those details with the companies register helps connect the person signing with the relevant appointment. A difference in birth details or address can then be investigated before credit is extended. The same comparison is important if the signatory's identity is later disputed.

A name and birth year can describe more than one person, including people living in the same state. Where two records contain the same name and year but different days or months of birth, the full date reveals a distinction which the proposed extract would conceal. A residential address provides a further point of comparison. ASIC's proposed residential locality is only the state and country; it cannot corroborate the street address supplied in an application.⁴

This is a fraud-prevention issue as well as a matching issue. A person who shares a director's name and birth year may produce genuine identification in their own name while falsely claiming the other person's corporate appointment. Checking only the fields which the two people share cannot expose that distinction. The full date of birth and address provide additional comparisons before money, goods or account information are released.

Director ID will improve the linkage of appointments within the register. Creditors also need to match those appointments to records outside it. An agreement, guarantee or identity document may contain a name, full birth date and address but no Director ID. Publishing a unique number against the company record does not create the missing connection with those documents. Nor does quoting that publicly available number authenticate the person quoting it.

The access model needs to accommodate common names and overlapping personal details in ordinary business dealings. AUSTRAC expressly recognises that these circumstances may require additional information to distinguish individuals. ASIC should assess the incidence of distinct individuals sharing a name, birth year and residential locality in its own records, and test matching to external records without a Director ID. The relevant test is whether a user can reliably connect the person with the record, not only distinguish appointments within the register.⁵

Locating directors and guarantors

Tracing involves comparing the information already held on an account with later names, addresses and other contact records. A residential address can supply a location for an enquiry, while a former address can establish that a newly identified record relates to the person in the original agreement. Used with the full date of birth, that history helps a collector distinguish a credible match from another person with the same name.⁶

Consider a director who gave a guarantee when a company opened a trade account and has since moved. The company no longer trades from its original premises, its telephone number is disconnected and correspondence is returned. The collector has the agreement and the original address, but no effective contact with the guarantor. A current and historical company search can supply a later

⁴ ASIC, CP 391, Table 2, p 8, and "Residential addresses", p 9. Residential locality is defined as state and country.

⁵ [AUSTRAC, Overview of initial customer due diligence, "How to establish matters on reasonable grounds" \(accessed 8 October 2026\), concerning common names and personal details.](#)

⁶ ACDBA and other industry bodies, Registry stabilisation and uplift – draft legislation consultation (13 February 2026), pp 10–11, "Enforcement and litigation".

residential address and connect it with the identity in the guarantee. That gives the collector a basis to check the location, explain the claim and seek a response.

This is not confined to commencing proceedings. Re-establishing contact creates an opportunity to explain an account, obtain information about a dispute or negotiate payment. A director or guarantor may not know that company staff have failed to address overdue invoices. Reaching the appropriate person can resolve the matter before further costs are incurred.

A nominated service address may provide a suitable destination for documents, but does not supply the residential information used in that tracing process. An accountant's office gives no residential link to the address in an earlier guarantee or another contact record. Its availability therefore does not answer the collector's need to identify and locate the individual. Both addresses should remain available to verified users for the relevant purpose.

Where a claim against a guarantor proceeds to court and personal service is required, a process server must also find the correct individual. Residential information supplies a practical lead for that task. Without it, additional searches and attendances may be needed before service can occur, with further cost and delay if those enquiries are unsuccessful.⁷

Investigating disputed identity and suspected fraud

A denial that the person signed an agreement requires investigation, not another demand based on the same untested information. The collector may need to compare the application, the creditor's identification records and the registry details recorded at the time. Differences can indicate an administrative error, a mistaken match or possible impersonation. The outcome may be to correct the account or cease collection against that person.

The joint ACCC and ASIC Debt collection guideline sets out expectations for identification before debt information is disclosed and investigation where liability is disputed. Access to the matching information assists members to meet those expectations. Removing a useful check increases the risk of disclosure to an unrelated person and makes a later complaint more difficult to resolve.⁸

The register also assists investigation of connections between businesses. Where a failed business is followed by another company with different officeholders, residential information may identify a connection which a Director ID search would not show: the individuals have different IDs, but their address histories overlap. This can justify further enquiries into the transaction history, control of the business or suspected phoenix activity. A shared address is a lead to investigate, not a finding of wrongdoing.⁹

The practical value is the ability to test the information before acting on it. Accurate matching protects a person wrongly associated with a failed business as well as a creditor exposed to deliberate misrepresentation.

Changes of directors and account authority

Registry checks are also used while accounts remain active. A change of directors can affect who is authorised to receive information, negotiate arrangements or execute documents. The creditor needs to establish both the current appointment and the identity of the person seeking to act under it.

This is relevant to ordinary trading companies and to clubs or other organisations incorporated as companies, including companies limited by guarantee. Following a board handover, a bank or supplier may be dealing with people it has not previously met. Full identifying details assist the comparison between those people and the recorded appointments. Access to names alone does not perform the same check.

Independent access allows the creditor to check the appointment rather than depend on an extract supplied by the person being assessed. A passport or driver licence may establish who that person is, but not that they hold the claimed directorship. The creditor must connect the verified individual with ASIC's

⁷ [See, for example, Uniform Civil Procedure Rules 1999 \(Qld\), rr 105–106, concerning personal service of originating process and how personal service is performed.](#)

⁸ [ACCC and ASIC, Debt collection guideline: for collectors and creditors \(April 2021\), Part 2, sections 1 and 13, pp 6–7 and 26–27.](#)

⁹ ACDBA and other industry bodies, Registry stabilisation and uplift – draft legislation consultation (13 February 2026), p 3, points 1–4.

appointment record. CP 391 identifies no equivalent independent way for an ordinary creditor to make that connection once the full matching details are withheld.

An incoming board may need a bank to update signatories, a supplier to accept instructions or a collector to discuss an arrangement. In a disputed handover, current and former officeholders may both approach the creditor. Without reliable identity and appointment checks, legitimate business may be delayed or instructions accepted from someone no longer entitled to act. Current and historical details help resolve that uncertainty before information is disclosed or commitments are made.

If discovered only after an account falls into dispute, the issue may require reconstruction of who held office, who signed and what authority existed. A payment dispute can become litigation over identity, execution and whether the company is bound. The burden extends beyond the parties' legal costs to judicial time, court administration and the public funds supporting those services. Reliable verification at the time of dealing reduces avoidable disputes and supports the administration of justice.

Monitoring changes in credit risk

Credit risk is not fixed when an account is opened. A supplier continuing to deliver on terms repeatedly extends credit under arrangements which may be years old. Directors may change, a guarantor may leave, payment performance may deteriorate or another company associated with a relevant individual may fail. The creditor needs to assess whether those developments change the risk of continuing supply and whether existing arrangements remain appropriate.

Registry information supports that review by linking appointments to the creditor's records and other lawfully available information. Full birth details help attribute company connections and adverse records to the correct person. Residential and historical information helps establish continuity, investigate changed details and contact a guarantor. Notice of a director's departure identifies an event; the underlying information is needed to assess its significance.¹⁰

For example, a supplier may have approved ongoing credit with guarantees from the then directors. A management change requires it to establish who now acts for the company, review the support for future credit and decide whether existing terms remain appropriate. Reliable information allows satisfactory arrangements to continue rather than every change prompting a restriction on supply.

Removing the information does not remove the change in risk. It reduces the creditor's ability to recognise and assess it. Where a creditor cannot distinguish a routine change from a material deterioration, it may adopt more conservative limits and terms across a wider group of customers. The ability to monitor risk throughout an account's life is therefore part of what makes continued credit available in the first place.

Purchased debts and historical records

Independent registry access is needed both when an agency acts under a creditor's instruction and when a purchaser administers a debt it owns. In either case, the information is used to check identity and contact details, assess the supporting records and investigate disputes. Eligibility should expressly accommodate both arrangements.

For a portfolio containing company debts or director guarantees, registry information can assist assessment before purchase. The prospective purchaser needs to connect the identified parties with the supporting documents, investigate relevant guarantees and understand what is required to administer the accounts properly. This work supports an orderly transfer of responsibility, accurate account records and continuity in the treatment of consumers and businesses whose accounts are transferred.

After purchase, the need continues. Information supplied at settlement records what was known at that time; it cannot provide subsequent changes of address or appointment. A purchaser must be able to update relevant information, investigate a later denial of identity and explain the basis on which an account has been attributed to a person.

Historical records are therefore as important as a current extract. The directors now listed may not be those who entered the original transaction. Earlier appointments, names and addresses help establish

¹⁰ ACDBA and other industry bodies, Registry stabilisation and uplift – draft legislation consultation (13 February 2026), p 10, "Account Management and maintenance".

who held office and connect the signatory's details with the company at the relevant date. They also help explain discrepancies caused by changes since the agreement was made.

The proposed document-redaction arrangements should preserve the fields an eligible user is authorised to receive. Where the lodged document is needed to establish the date or context of a record, a current extract is not an equivalent substitute. The final settings should maintain access to that evidence while allowing unrelated personal information to be redacted.¹¹

Credit reporting and information services

Credit reporting bodies and other information providers allow registry data to be used with account, identity and commercial information. Full birth details and addresses assist the matching process: they help determine whether a directorship, former company association or adverse record belongs to the person being assessed. A mismatch can affect both the accuracy of the report and the decision made from it.

For a collector, these services can help connect an incomplete referral with the correct corporate record. For a creditor, they can support assessment of a guarantee and ongoing review of the customer's risk profile. For the person concerned, accurate matching helps avoid another individual's history being attributed to them and assists correction when information is challenged.

The access arrangements need to cover both the provider's work and the eligible customer's use. Providers need the information necessary to maintain and match their records, investigate discrepancies and produce reliable results. Creditors and agents need to receive the relevant information or verification output for their authorised task. The conditions governing access, processing and onward supply should provide for that complete process.

Direct ASIC searches allow a business to obtain company information for an individual matter. Credit reporting bodies and information brokers also combine registry information with other permitted information, support ongoing monitoring and process searches across portfolios. Both channels serve practical needs. They rely on the underlying ASIC data: obtaining a report from an intermediary does not restore a birth date or address which that intermediary is no longer entitled to receive or supply.¹²

AML/CTF and independent verification

For creditors subject to anti-money laundering and counter-terrorism financing requirements, customer due diligence includes establishing the identity and authority of relevant representatives and identifying beneficial owners where required. AUSTRAC's guidance calls for verification using reliable, independent data appropriate to the risk. It expressly recognises that common names and personal details can require further information to distinguish individuals.¹³

Where the relevant person is a director, registry birth and address details allow the identity information collected by the creditor to be compared with the corporate appointment. A discrepancy can then be investigated. Reducing the extract to a name, birth year and broad locality removes information from that independent comparison, even though the creditor still needs to complete it.

Creditors may require an appointed collection or servicing agency to verify the identity of the person discussing an account and investigate inconsistencies before exchanging account information. These requirements can form part of the client's procedures and service agreement. The agency therefore needs access to the information required to perform the check, even where the statutory obligation rests with the client. Legitimate commercial verification by businesses without AML/CTF obligations also needs to be accommodated.¹⁴

ACDBA recommends that ASIC settle the proposed access arrangements with AUSTRAC and affected users so that the registry continues to support the relevant checks. The issue is the availability of usable independent information, not simply whether more company details appear on a free extract.

¹¹ ASIC, CP 391, "Access to lodged documents", p 10.

¹² ACDBA and other industry bodies, Registry stabilisation and uplift – draft legislation consultation (13 February 2026), pp 4–6, recommendations concerning direct and intermediary access.

¹³ [AUSTRAC, Overview of initial customer due diligence, sections on collecting KYC information, identifying beneficial owners and persons acting for customers, and verification using independent and reliable data \(accessed 8 October 2026\).](#)

¹⁴ ACDBA and other industry bodies, Registry stabilisation and uplift – draft legislation consultation (13 February 2026), p 3, point 8, and p 9, points 4–5.3

Consequences for credit and recovery

The primary economic concern is the risk of providing and continuing credit, not simply a higher search cost. Less reliable identification, monitoring and recovery make it harder to keep an account within an accepted level of risk. That uncertainty can alter credit policy even where the customer's underlying business has not changed.

Trade credit allows a business to obtain goods and services before receiving the revenue needed to pay for them. A supplier funds its customer's stock, materials or services while meeting its own commitments. Reliable information about the customer and guarantors helps determine how much exposure it can accept and for how long. Restrictions weaken both the initial assessment and ongoing review.

Creditors may respond by reducing limits, shortening terms, requiring further security or moving customers to payment in advance. This affects existing accounts as well as new applications. Customers then need more cash or alternative finance for the same purchases, and may reduce orders or decline work. Across suppliers, these decisions could materially restrict commercial credit and the trade it supports.

Smaller and newer businesses are particularly exposed where they have limited financial records, little security or no ready substitute for supplier credit. They may be commercially sound but unable to provide additional assurance. Less precise risk assessment can therefore restrict credit to viable businesses as well as fail to identify genuine concerns.

Effective, lawful collection also supports the continued availability of credit. Resolving unpaid accounts returns funds to circulation and helps creditors meet their own commitments and serve new customers. The orderly transfer and administration of receivables allows existing exposures to be managed without leaving accounts unresolved. Where identification and recovery become less reliable, unpaid balances remain outstanding for longer, losses accumulate and creditors have less capacity or willingness to extend further credit to other consumers and businesses.

Ambiguous matches require investigation, outdated contact details require tracing, and unsuccessful service can delay resolution or require court applications. These burdens can make a smaller claim uneconomic to progress. The consequences are felt in payment discipline, business cash flow and confidence in extending further credit.

There are corresponding costs for individuals when poorer matching produces an incorrect demand or delays correction of a record. ASIC's assessment should examine the combined effects on fraud prevention, ongoing risk management, credit availability, recovery and court resources, alongside privacy and safety. The statutory test requires consideration of the consequences of both imposing and not imposing restrictions, including their effect on the administration of justice.¹⁵

Access for legitimate business users

The business access category should expressly recognise creditors, including trade creditors, debt purchasers and assignees, collection and servicing agencies, and authorised investigators, process servers and information providers. The permitted purposes should cover credit and guarantee assessment, ongoing risk monitoring, relevant acquisition due diligence, verification, account administration, tracing, investigation, dispute resolution, collection and enforcement.

Both full dates of birth and residential addresses are required for the functions described above. These should be available alongside relevant names, appointments and historical records, with access limited to what the legitimate task requires. ASIC should specify those entitlements in the instrument and supporting arrangements so businesses can design their procedures around a clear and continuing access basis.

¹⁵ ASIC, CP 391, Appendix 1, Table 3, p 15, setting out the factors under s 1274AC of the Corporations Act 2001 (Cth).

Verifying users

There is no single licence which identifies every legitimate user. Queensland collection agents undertaking telephone and written collection, for example, do not require a licence or registration, although suitability and conduct requirements apply. Trade creditors also include ordinary suppliers whose business is not the provision of regulated consumer credit. A licensing test alone would therefore be incomplete.¹⁶

ASIC should verify the business's identity, responsible officer and relevant activities, together with the authority of the people accessing information for it. Relevant licences and professional standing can assist that process. Existing verification undertaken by approved information providers should be recognised where it meets ASIC's requirements, with an equivalent direct-access route for businesses obtaining searches themselves.

An eligible business should be able to record the permitted purpose and the relevant account, matter or transaction, and retain its authority for audit. This allows routine searches to proceed under an accountable standing authorisation, with supporting records available for review. Access arrangements should accommodate both occasional searches by smaller creditors and properly controlled portfolio work.

Company access serves a different relationship: a representative acts for the company or officeholder whose records are being accessed. A creditor's collector acts for the creditor. Business access is consequently needed in its own right, including when the debtor company is not cooperating. Within company access, ACDBA supports prompt verification of incoming representatives and removal of former representatives' access following a change of authority.

Direct and intermediary access

The same permitted functions should be supported through ASIC and approved information providers. Conditions should permit necessary disclosure within an authorised matter, including between a creditor or purchaser, its collection agency, solicitor and field agent. Each recipient should be accountable for its use, without requiring the same information to be separately purchased by every participant.

A verification-only service is also worth developing for checks where a user already holds the details and needs confirmation. It can reduce disclosure in those circumstances. Tracing and discrepancy investigation require access to information the user does not already hold, so full-information access must remain available for those tasks. The verification option should complement the proposed business category.

Privacy and safeguards

ACDBA supports enforceable limits on use and disclosure, secure handling, named user accounts, appropriate authentication and audit trails. Permissions should reflect an employee's duties and end when their authority ends. Information obtained for credit or recovery work should not be republished publicly or used for unrelated marketing. Misuse should lead to effective investigation and sanctions, including loss of access where appropriate.

ASIC's proposed business category already recognises that legitimate functions require access to information withheld from the general public. The same principle should apply to verified credit and recovery users. Protecting directors from indiscriminate disclosure can be achieved through controls on who receives the information, the purposes for which it is used and effective action against misuse.¹⁷

ACDBA also supports the separate treatment of information suppressed because of heightened safety or privacy risks. Ordinary business accreditation should not override an individual protection. ASIC's proposed separate process should remain available for disclosures permitted by law and considered appropriate, with timely arrangements for matters requiring lawful service or investigation.¹⁸

The assessment of privacy effects should include the consequences of weaker matching and increased reliance on alternative information sources. Businesses may respond to reduced independent verification

¹⁶ [Queensland Government, Office of Fair Trading, Work as a collection agent \(accessed 8 October 2026\)](#).

¹⁷ ASIC, CP 391, pp 7 and 12, concerning restricted access for verified business users and user verification.

¹⁸ ASIC, CP 391, "Hidden information", p 10.

by collecting and retaining additional identity documents. Preserving proportionate access to the relevant registry fields can avoid creating unnecessary information holdings elsewhere.

Search records should be retained for ASIC's oversight rather than disclosed to the subject through search alerts or monitoring services. Revealing a collection or investigative enquiry can enable evasion of service, movement of assets or interference with evidence, and may expose an agent or another person to threats. Those risks also arise where a director has opted into a monitoring service. ACDBA recommends that the access conditions protect the confidentiality of these enquiries through both direct and intermediary channels. This is separate from notifying a company of changes or suspected unauthorised lodgements affecting its own record.

Implementation

ASIC proposes to publish a draft instrument in March 2027 and commence the new access settings on 1 July 2027, with full implementation from 1 August 2028. This leaves only a few months between the draft instrument and the first restrictions. The time available after the final rules are settled may be shorter still.¹⁹

Businesses need to know which information they will receive, how they qualify and how their systems will obtain it. Information providers must adapt their services before creditors and agencies can integrate the changes, test matching and monitoring, revise procedures and train staff. These stages cannot all be completed simultaneously. The August 2028 milestone provides no extra time to prepare for information restricted in July 2027.

ACDBA considers the proposed interval too short to assume all affected businesses will be ready. ASIC should agree a realistic transition once final rules and technical specifications are available, allowing more time where the work requires it. Existing authenticated access should continue until eligible users have had a reasonable opportunity to qualify, complete their changes and test the replacement. Readiness should determine when restrictions take effect, rather than requiring businesses to operate with an information gap.

Testing should include the work described in this Submission: matching an old agreement, assessing a change of directors or credit risk, locating a guarantor, investigating disputed identity, retrieving historical documents and conducting authorised portfolio searches. Testing current company extracts alone would not establish that the arrangements work for credit management, collection and debt purchase.

ASIC should also clarify the treatment of earlier lodged documents and information already lawfully held. Businesses need to preserve records supporting account decisions, complaints, audit and proceedings, subject to applicable retention and privacy requirements. Clear transition arrangements will avoid gaps in the evidence available for existing accounts.

The new Director ID and overdue-review indicators should have clear definitions, update dates and correction processes. ACDBA supports useful indicators, but users must be able to distinguish an identity confirmation or unpaid review fee from a substantive assessment of creditworthiness. Keeping the next review date freely available would assist interpretation. These details should be tested with users alongside the access arrangements.

Conclusion

ACDBA recommends that ASIC expressly include verified credit and recovery users in business access, with full dates of birth, residential addresses and relevant historical information available for their legitimate functions. The information connects people with agreements, supports assessment of changing risk, helps locate the correct person and enables disputes and unpaid accounts to be resolved. Those functions sustain confidence in extending and continuing credit. Director ID linkage and service addresses improve the register but do not replace them.

The final arrangements should preserve access through ASIC and approved information providers, supported by verification, purpose limitations, secure handling and oversight. ACDBA welcomes further engagement on the design and testing needed to achieve that outcome before restrictions take effect.

For further information, please contact Jacob Maiore, CEO, at ceo@acdba.com or on 02 4925 2099.

¹⁹ ASIC, CP 391, Table 1, p 4, "Stages to rollout of new registry services".

Appendix 1

Members of Australian Collectors & Debt Buyers Association

- Arbor Knot Holdings Pty Ltd
- Axxess Recoveries & Collections Pty Ltd
- CCC Financial Solutions Pty Ltd
- Charter Mercantile Pty Ltd
- Credit Corp Group Limited (ASX: CCP)
- PRA Australia Pty Ltd (NASDAQ: PRAA)
- Recoveries Corporation Pty Ltd
- Standard8 Advisory Pty Ltd
- Strategic Collections Pty Ltd

Affiliate Members of Australian Collectors & Debt Buyers Association

- Acceleon
- Collect!
- CreditSoft Solutions
- Equifax
- Experian Australia
- TaleFin Australia
- TCN