

# Target Market Determination Secured Personal Loan



## ABOUT THIS DOCUMENT

R.A.C.V. Finance Limited ABN 82 004 292 291 Australian credit licence number 391488 (RACV Finance) has issued this Target Market Determination (Determination) as the issuer of the following secured personal loan products (Secured Personal Loan):

**RACV Secured Personal Loan**

**RACT Secured Personal Loan**

**NRMA Car Loan**

This Determination describes the types of customers that the Secured Personal Loan was designed for and the conditions that apply to the distribution of the Secured Personal Loan by RACV Finance and its distributors.

This Determination is effective on and from 5 October 2021 (Effective Date).

## TARGET MARKET

The Secured Personal Loan is designed to provide timely medium-term financial assistance to retail customers residing in Australia seeking to purchase personal property and/or services for household, domestic or personal use.

The Secured Personal Loan's target market is defined in this section, outlining the class of retail customer through detailing product design factors such as key product attributes and eligibility criteria. These take into consideration the likely needs, objectives, and financial situation of the intended target market for which the product has been designed.

Table A provides a summary of key product attributes and highlights purposes for which the loan is suitable and not suitable.

Table B provides a summary of the eligibility criteria for the class of retail customer for who the product is suitable and not suitable.

The Secured Personal Loan, including its key attributes, is likely to be consistent with the financial situation, needs and objectives of the class of retail customers in the target market because money made available to customers under a loan may be used to fund the loan purpose.

The loan amount range, loan term and relative simplicity of the product is suited to the acquisition of personal property and services for personal, household, and domestic use.

Customers who can meet the financial requirements and are assessed as meeting RACV Finance's credit eligibility criteria should be able to meet their financial obligations under the credit contract, assuming no material change to their financial situation.

# Table A: Secured Personal Loan Product Attributes and Loan Purpose

## KEY PRODUCT ATTRIBUTES

<b>Borrowers</b>	Maximum of 2 (see eligibility criteria in Table B, NOTE co-borrowers must receive benefit from the loan)
<b>Guarantors</b>	Maximum of 2 (NOTE: Any guarantors must receive benefit from the loan and be subject to eligibility criteria in Table B)
<b>Loan Term</b>	Minimum 12 months, maximum 7 years
<b>Loan Amount</b>	Minimum of \$5000
<b>Repayment Type</b>	Principal and interest repayments only. RACV Finance does not offer secured interest only loans.
<b>Accepted Repayment Arrangements</b>	Weekly, fortnightly or monthly by direct debit, BPay, electronic funds transfer or at any National Australia Bank branch. A balloon repayment structure is available on request subject to meeting additional eligibility criteria including an acceptable method for final repayment.
<b>Interest Rate</b>	Fixed annual percentage rate that applies for the term of the loan. RACV Finance uses risk-based pricing to determine the annual percentage rate (APR).
<b>Additional Repayments</b>	Permitted. While no fees are charged if additional repayments are made during the loan term, an early termination fee may be payable if the loan is repaid in full prior to the end of the loan term.
<b>Fees</b>	An application fee is payable. An early termination fee may be charged if the loan is repaid in full prior to the end of the loan term. Security registration fees are payable at cost by the customer.
<b>Discounts</b>	Membership of the Royal Automobile Club of Victoria (RACV) Ltd or another auto club operating in Australia contributes as a positive factor in determining the APR. This means that auto club members will generally receive a lower interest rate than the advertised rate or the rate offered to non-members.

## LOAN PURPOSE

<b>General household assets</b> (e.g. motor vehicle, caravan, boat)	✓ Appropriate
<b>Home improvements to principal place of residence</b> (e.g. home renovations, installation of solar panels)	✓ Appropriate
<b>Debt consolidation</b>	✓ Appropriate
<b>One-off large personal expenses</b> (e.g. travel expenses, medical bills, wedding expenses)	✓ Appropriate
<b>Interest in real property</b>	✗ Not Appropriate
<b>Statutory payments</b> (e.g. taxes, council rates, fines, penalties)	✗ Not Appropriate



# Table B: Secured Personal Loan Eligibility Criteria

## CUSTOMER STATUS AND FINANCIAL SITUATION

Is a natural person, over the age of 18 years, with permanent Australian residency	✓ Eligible
Has regular income paid in Australia	✓ Eligible
Employed on a regular basis in Australia	✓ Eligible
Has sufficient funds to meet general day to day living expenses and financial commitments of the loan NOTE: If the loan has a balloon payment structure there will be additional requirements to meet	✓ Eligible
Has a history of savings and/or making repayments on time	✓ Eligible
Can meet RACV Finance's 'know your customer' and other anti-money laundering and counter-terrorism financing (AML/CTF) requirements	✓ Eligible
Can provide an acceptable asset as security for the customer's obligations under the credit contract	✓ Eligible

### Security Criteria (Passenger Vehicles and other Lifestyle Assets)

Is a registrable security with confirmed ownership by at least one of the loan borrowers (e.g. If a motor vehicle has a Vehicle Identification Number)	✓ Eligible
Is covered by insurance for loss of, or damage to, the secured asset during the loan term	✓ Eligible
Provides sufficient loan to value ratio (LVR)	✓ Eligible
Is in good working order and meets usage and manufacturer conditions (e.g. a passenger vehicle is required to be road worthy, no older than 20 years at loan maturity and, not be a project/hobby build)	✓ Eligible
Is reported stolen	✗ Not Eligible
Under active manufacturer recall	✗ Not Eligible

NOTE: If a security meeting the above criteria cannot be provided RACV Finance may register a caveat on the borrower's residential property or determine that this product is not appropriate for the customer.

### Security Criteria (Caveat on residential property)

Residential property on vacant land located in Victoria	✓ Eligible
All owners on title are beneficiaries and signatories to the loan	✓ Eligible
Maximum LVR of 85% for residential property or 60% of capital improved value for vacant land	✓ Eligible
Is a commercial property, unit under a body corporate management or any strata titled property	✗ Not Eligible
Has more than one existing mortgage on the property	✗ Not Eligible

Has no proven financial history (including no evidence of savings, regular income or making regular repayments)	✗ Not Eligible
Will undergo substantial financial hardship as a result of entering the loan or is experiencing financial hardship at the time of application	✗ Not Eligible
Is an undischarged bankrupt, or a director of an entity that is in liquidation	✗ Not Eligible
Holds, or whose family member or close associate holds, a prominent public position or role in an overseas government body	✗ Not Eligible
Is a company or other corporate structure (including trusts)	✗ Not Eligible



## DISTRIBUTION CONDITIONS

The Secured Personal Loan is distributed through RACV Finance and, authorised brokers (including retail motor vehicle dealers).

Distribution methods for distributors are outlined in Table C.

### Table C: Secured Personal Loan Distribution Methods

DISTRIBUTOR	ONLINE	ON THE PHONE	IN PERSON
RACV Finance	✓	✓	✗
Authorised Brokers	✓	✓	✓

The Secured Personal Loan is promoted by RACV Finance predominantly as a personal loan or as a car loan. Decisions about the content and placement of advertisements are made by RACV Finance having regard to whether it is more likely that the customers who acquire the product are in the target market, taking in account in particular loan purpose. Distributors are not permitted to place advertisements without the prior written approval of RACV Finance.

RACV Finance staff and Authorised Brokers who distribute the Secured Personal Loan must first be accredited by RACV Finance by satisfying RACV Finance's onboarding and training requirements. This includes providing training to distributors on the target market, including RACV Finance eligibility criteria and product features and suitability. Authorised Brokers are selected based on detailed assessments and due diligence checks including verification of credit licence, registration with required regulatory bodies and, absence from banned/disqualified registers.

All loan applications must be submitted for assessment to RACV Finance through a lending portal made available to all distributors. All loan applications are assessed for suitability by RACV Finance having regard to customer financial requirements and loan objectives in accordance with relevant credit and responsible lending policies and applicable law. A customer will not be offered a loan unless the application has been approved by RACV Finance.

RACV Finance considers that these distribution conditions make it more likely that customers who acquire a Secured Personal Loan will be in the target market.



## REVIEW TRIGGERS

The events and circumstances that would reasonably suggest there is a need to review this Determination to assess if it is still appropriate are:

- A change to the design of the product's key attributes.
- A significant change to RACV Finance credit policy that affects the loan eligibility criteria.
- A change in RACV Finance's AML/CTF Program affecting customer types, products, and delivery channels.
- A change to the distribution strategy which results in a change to distribution conditions.
- A legislative or regulatory change, or external events (e.g. adverse media coverage) that affect the product attributes or the distribution conditions.
- A significant change in complaint trends and insights, or sales and conversion rates.
- Systemic issues identified across the product lifecycle (identified by product monitoring, testing or internal audit recommendations).
- If a significant dealing outside of the target market has occurred.

If a review trigger occurs, this Determination will be reviewed within 10 business days.

### First review

RACV Finance will complete its first review of this Determination within 12 months of the Effective Date.

### Subsequent reviews

Thereafter a review of this Determination will be completed every 2 years or sooner if a review trigger occurs.

## REPORTING & MONITORING

### Complaints Reporting Period

Authorised Brokers must provide to RACV Finance information about the number of complaints about the Secured Personal Loan on a quarterly basis. Where complaints are reported, the Authorised Broker will provide information about the substance of complaints and general feedback from customers relating to the product and its performance.

### Monitoring & Other Reporting

RACV Finance may also collect from Authorised Brokers (where that information is not otherwise available to RACV Finance) information about:

- on a quarterly basis, how the Authorised Brokers promoted the Secured Personal Loan during the preceding quarter;
- any significant dealing in relation to the product that is inconsistent with this Determination within 10 business days of the significant dealing occurring.

