

# **Target Market Determination: NOW Finance Secured Personal Loan**

**Issuer:** Now Finance Group Pty Ltd as agent for NF Finco 2 Pty Ltd (**NOW** 

Finance)

ACN 164 213 030 Australian Credit Licence number 425142.

Start Date: 30 June 2023

Product: NOW Finance Secured Personal Loan

NOW Finance's Secured Personal Loan (the Loan) allows individuals to borrow funds for a number of personal, domestic or household purposes secured against a vehicle, watercraft or caravan. The Loan offers a fixed interest rate and requires individuals to make regular repayments over a fixed term.

# **Purpose of this Document**

This target market determination (**TMD**) seeks to provide consumers, distributors and staff with an understanding of the class of consumers (target market) for which this product has been designed, having regard to the likely objectives, financial situation and needs of the target market.

This document should not be treated as a full summary of the product's terms and conditions or all of the product's features. This document is not a customer disclosure document and does not provide financial advice.

Consumers should refer to the Credit Guide, Credit Schedule and the other documents setting out the terms and conditions of the product when making a decision about this product. These documents are provided to a consumer prior to the provision of credit. A copy of these documents can otherwise be requested by contacting us at: <a href="mailto:customerservice@nowfinance.com.au">customerservice@nowfinance.com.au</a>

## **Target Market and Key Attributes**

The Loan is designed for the class of consumers who:

- wish to borrow a large sum of credit from a non-bank lender and are able to provide an asset as security for the Loan;
- meet the eligibility requirements for the Loan (Eligibility Requirements), including:
  - o being of 18+ years of age;
  - o holding Australian citizenship or permanent residency;
  - o currently employed (full time/ part time/ casual) and not on probation;
  - o no defaults (paid or unpaid);
  - o Centrelink is not the primary form of income;
  - o not a current or prior bankrupt or party to a court judgement; and
- have the likely needs, objectives and financial situation described below (Target Market).



The NOW Finance
Secured Personal Loan
has been designed for
customers with the
following likely needs,
objectives and
financial situation:

Key Attributes of the NOW Finance Secured Personal Loan that make the product consistent with the likely objectives, financial situation and needs of consumers in the target market.

## Objectives

- Obtain a large lump sum which can be used for a wide range of [expensive] personal, domestic, or household purposes including but not limited to:
  - Vehicle, watercraft or caravan purchases;
  - Home renovations;
  - Household furnishings;
  - Debt consolidation;
  - Travel;
  - Medical expenses; and
  - Wedding expenses.

- A NOW Finance Secured Personal Loan provides:
  - a single lump sum of credit (in other words it is not revolving credit);
  - a minimum sum of \$15,000 and a maximum sum of \$100,000 which is a sufficiently large sum for these types of personal, domestic or household purposes.
  - it can be used for any personal, domestic, or household purpose.

# Needs

- Spread / smooth the repayments over an extended period of time without a balloon payment at the end.
- A NOW Finance Secured Person Loan provides:
  - a term between 1.5 years to 7 years which is an extended period of time;
  - weekly or fortnightly payments to smooth/spread the repayments; and
  - repayments of principal and interest so that it is paid off by the end of the term.
- Need certainty of repayment amounts.
- A NOW Finance Secured Person Loan provides:
  - a fixed interest rate which allows repayment amounts to be the same and therefore certain;



	o no Loan fees, including upfront fees, periodic fees or event-based fees.
<ul> <li>Need flexibility to make extra repayments or pay out the Loan early.</li> </ul>	<ul> <li>A NOW Finance Secured Person Loan provides:         <ul> <li>No extra repayment charges: customers can make early repayments during the Loan without any fees.</li> <li>No early repayment charges: customers can pay out their Loan at any time without any fees or charges.</li> </ul> </li> </ul>
Financial situation	
<ul> <li>Owns (or will acquire with the funds) a vehicle, watercraft or caravan to provide as security for the Loan.</li> </ul>	Security: a customer is required to provide security for the Loaned amount.
Have the financial capacity to service the Loan.	NOW Finance analyses and assesses the suitability and affordability of the Loan to the consumer's needs and objectives when assessing an application for the Loan and conducts a credit assessment to confirm whether the consumer would have the financial capacity to service the ongoing financial obligations under the Loan.

## **Excluded customers**

The NOW Finance Secured Personal Loan is not designed for individuals who:

- do not satisfy each of the Eligibility Requirements;
- do not have consistent income;
- want the interest rate to increase/decrease over the life of the Loan;
- want to be able to redraw any additional repayments made on the Loan;
- do not have a suitable asset to provide as security for the Loan;
- are seeking a Loan amount of less than \$15,000 or more than \$100,000; and/or
- require an ongoing line of credit that can be redrawn up to the limit.

## **Distribution of the NOW Finance Secured Personal Loan**

NOW Finance has the following distribution channels and applies the following conditions and restrictions to the distribution of the NOW Finance Secured Personal Loan through the channels so that this product is likely to be provided to customers who are in the target market.



## **Distribution Channels:**

#### **Direct Channels**

- The NOW Finance website: and
- The NOW Finance call centre.

# **Third Party Distributions Channels**

Authorised third party distributors such as:

- finance brokers and aggregators;
- partner websites (including comparison websites); and
- authorised referrers.

(Distributors)

# Distribution Conditions:

The NOW Finance Secured Personal Loan can only be distributed in accordance with the distribution conditions below.

#### **Direct Channels**

- NOW Finance website: Consumers click through a website
  journey which collects information on the consumer's objectives,
  needs and financial situation for assessment by NOW Finance. A
  Loan cannot be provided to a consumer until this information is
  collected and verified.
- NOW Finance call centre: Call centre staff are trained and follow
  a call script which asks questions of a consumer to collect
  information on their objectives, needs and financial situation for
  assessment by NOW Finance. A Loan cannot be provided to a
  consumer until this information is collected and verified.
- NOW Finance assesses each application against the Eligibility
  Requirements and conducts a credit assessment check to confirm
  that the consumer has an appropriate borrowing capacity to
  service the Loan, in accordance with NOW Finance's responsible
  lending guidelines and product and process requirements.
- Consumers who access the Loan via direct channels are provided with information and disclosures that make it more likely that the consumer will be able to assess whether the Loan is suitable for their objectives, needs and financial situation.

# **Third Party Distributors**

 All Distributors must have entered into a written agreement with NOW Finance which controls what they can and cannot do in distributing the product including in relation to marketing materials.



- For partner websites and referrers, they are not permitted to market the product other than through NOW Finance approved marketing material, most only display product information on their websites and must refer the customer lead through to NOW Finance's direct channels above which then follow the conditions above.
- All Distributors (excluding partner websites and referrers) must hold an Australian Credit Licence or be an appointed Credit Representative and be accredited by NOW Finance. This means that they are regulated (or subject to regulatory requirements), have their own requirements to comply with regulatory requirements, are of good standing and insured. This allows these distributors to do more than simply provide product information, they can also market and have unscripted conversations with customers.
- All Distributors (excluding partner websites and referrers) must be trained by NOW Finance on the product features and attributes, eligibility requirements, target market and distribution to inform their conversations with customers and so they can discharge their regulatory obligations. This training is also on the Eligibility Requirements for the Loan.
- To comply with their own regulatory obligations, all Distributors (excluding partner websites and referrers) ask questions to assess the individual customer's specific objectives, needs and financial situation and if they meet the eligibility criteria.

In all circumstances, a Loan cannot be provided to a consumer until NOW Finance has collected and verified required consumer information. As part of this process, NOW Finance will assess the suitability of the consumer and confirm whether the Loan will meet the consumers objectives and requirements.

### **Review of TMD**

NOW Finance will review this TMD periodically to ensure it remains appropriate.

Review Period	Initial Review: Within 12 months of the date of this TMD.		
	<b>Ongoing Review:</b> Within 12 months of the date of the previous review.		
Review Triggers	NOW Finance will also review this TMD if one or more of the following events occur:		
	<ul> <li>Material changes to the NOW Finance Secured Personal Loan</li> </ul>		



terms and conditions;
Occurrence of a significant dealing (where the NOW Finance Secured Personal Loan is not consistent with this TMD);
If the distribution conditions are found to be inadequate;
If there is an external event such as adverse media coverage or regulatory attention;
If there is a significant change in metrics, including but not limited to, complaints, default rates and application

# **Information Reporting**

Distributors or any 'regulated person' who engages in relation distribution conduct must provide Now Finance the following information:

rates.

Category	Information to be provided	How and When to Report
Complaints	Any complaints made in relation to the NOW Finance Secured Personal Loan including:  • the number of complaints received during the reporting period (which may be 0) and;  • written details of any complaints.	When to report: Within 10 days following the end of every six months.  How to report: Reports should be made to: Head of Dispute Resolution by email at: disputeresolution@nowfinance.com.au
Significant dealings	Any significant dealing in relation to the NOW Finance Secured Personal Loan and this TMD	When to report: As soon as possible but no later than 10 days after the person becomes aware of the significant dealing.  How to report: Reports should be made to the General Counsel by email at: legal@nowfinance.com.au



Revision Management				
Version	Start Date	Comment		
1.0	5 October 2021	TMD Issued		
2.0	1 April 2022	TMD Updated		
3.0	30 June 2023	TMD Updated		