

## Target Market Determination (TMD)

### Plenti personal loans

This Target Market Determination is a document which sets out the group of customers that form the target market for Plenti personal loan products. It also outlines any conditions on distribution of the product as well as triggers for review of this determination.

#### Product

Plenti personal loans

#### Issuer

This product is issued by Perpetual Corporate Trust Limited ACN 000 341 533 Australian credit licence number 392673 as custodian of the Plenti Lending Platform and Plenti Finance Pty Ltd ACN 636 759 861 and is managed by Plenti RE Limited ACN 166 646 635.

#### Date of TMD

5 October 2021

#### Target Market

##### Description of target market

This product has been designed for a broad range of individual borrowers who:

- require a loan of amounts starting from \$2,001;
- meet our credit and eligibility criteria;
- are over 18 years old;
- have likely *objectives, financial situation and needs* that will be met by a loan which enables them to:
  - make a medium to large purchase for a general domestic purpose including but not limited to debt consolidation, home improvement, holidays, weddings, and other acceptable uses;
  - repay in the amount required to fund the loan purpose by regular instalments; and
  - obtain the certainty of a fixed interest rate and fixed repayments for the term of the loan or prefer the flexibility of a variable rate which may fluctuate over the term of the loan;
- *secured personal loan option*: provide an appropriate asset (such as a car) to secure their obligations under the loan in order to obtain a lower interest rate than would apply to an unsecured loan.
- *unsecured personal loan option*: obtain a loan without being required to provide an asset to secure their obligations under the loan. Unsecured personal loans may have a higher interest rate to reflect the higher risk associated with the borrowing.

The product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market because the product's key attributes enable consumers in the target market to finance a medium to large purchase and spread the cost over the term of the loan. The product also provides consumers with the certainty of a fixed interest rate and fixed repayments for the term of the loan, or the flexibility of a variable rate which may fluctuate over the term of the loan. Both fixed and variable options provide consumers with the option of whether or not they wish to provide security.

## **Classes of consumers for whom the product may be unsuitable**

This product may not be suitable for people who:

- do not meet our credit and eligibility criteria;
- have a poor credit history or are currently or formerly bankrupt;
- do not wish to pay by direct debit;
- are seeking a loan for certain purposes that do not satisfy our credit and eligibility criteria; or
- want to deal with a lender in person or via a branch.

## **Description of product, including key attributes**

- Fixed rate or variable rate personal loan
- Unsecured or secured option
- Loan terms generally between 6 months and 7 years
- Application fee is generally payable
- No ongoing monthly fees are payable
- Additional repayments are available with no additional fees

## **Distribution conditions**

Plenti personal loans can be distributed via the below distributors. In all cases, applications for personal loans must be submitted to Plenti via its website or an approved API.

### **1. Direct – Plenti's website and sales team**

Plenti sales staff are required to undertake training prior to assisting applicants with personal loans and must follow all documented procedures. Plenti will ask screening questions as part of an application to ensure that a prospective borrower is within the target market set out above.

Plenti considers this is an appropriate distribution channel because of the broad nature of the target market and the requirement for all sales staff to have the necessary training, skills and knowledge to assess whether the consumer is within the target market.

### **2. Third Party – Accredited aggregator/ broker partners**

Broker partners must be appropriately licensed to provide credit assistance in relation to personal loans. These partners are not permitted to distribute Plenti personal loans until they have undertaken an appropriate accreditation process, including entering into an agreement with Plenti. All applications submitted must comply with our policies and procedures issued to accredited broker partners from time to time.

Plenti considers this is an appropriate distribution channel because:

- accredited brokers that are subject to BID have a higher duty ensure that the product is in the best interests of the particular consumer;
- brokers who are not subject to BID are trained in relation to our products and relevant regulatory requirements;
- of the industry knowledge of aggregator and broker partners; and
- of the broad nature of the target market.

### **3. Third Party – Suppliers of goods and services**

Suppliers of goods and services may distribute the product after entering into an appropriate agreement with Plenti. Suppliers may only distribute Plenti's products in accordance with any guidelines provided by Plenti.

Plenti considers this is an appropriate distribution channel due to the need for these parties to comply with Plenti's guidelines and the broad nature of the target market.

### **4. Third Party – Other intermediaries and rate comparison sites**

Other intermediaries may include rate comparison sites who present Plenti personal loans among a number of loan options to a prospective borrower, or referrers who assist a customer in accessing Plenti's products. These partners must accurately represent the key attributes of the product and, where multiple products are presented, must only present it among other "like" products.

Plenti considers this is an appropriate distribution channel due to the broad nature of the target market.

## **Review Triggers**

The review triggers that would reasonably suggest that the TMD is no longer appropriate include where:

- we make a material change to the personal loan product, including to the key attributes or fees;
- we receive systemic complaints regarding the design or distribution of the product;
- we become aware of a significant dealing in the product which is not consistent with this TMD; or
- we identify materially adverse changes in relevant credit performance metrics, such as early repayment rates, late payment rates, default and loss rates, hardship rates, or an overrepresentation of a distributor in decline or arrears data.

## Review Periods

### First review date:

6 months after the date of this TMD.

### Periodic reviews:

Every 12 months after the initial and each subsequent review.

### Trigger review:

Review to be completed within 10 business days of the identification of a trigger event.

## Reporting by our distributors

The following information must be provided to us by distributors who engage in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
<b>Specific complaints</b>	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
<b>General information about complaints</b>	Number of complaints.	Every 6-month reporting period.
<b>Significant dealing(s) where the distributor believes that a significant number of customers outside the target market are obtaining this product</b>	Date or date range of the significant dealing(s) and description of the significant dealing.	As soon as practicable, and in any case within 10 business days after becoming aware.

This document should not be taken as financial product advice and has been prepared as general information only without consideration for your particular objectives, financial circumstances or needs. More information about the product can be found on our website, or in your loan contract.