

Target Market Determination

Issuer: Devizo Finance Pty Ltd ABN 21 622 104 527 through its agent, Navalo Financial Services Group Limited (trading as Payright)

ABN: 24 605 753 535

ACL: 533 485

Product: Unsecured Personal Loan (PayrightPlus)

Effective Date: 21 November 2023

1. About this document

This target market determination (TMD) has been prepared to assist consumers and merchant distributors to understand the target market for the PayrightPlus Loan Product.

It also provides information on:

- Who the product is and is not suitable for
- How the product will be distributed to our customers;
- How often we will review this TMD and when the next review will be;
- The events and circumstances that could mean we need to review whether this TMD is still appropriate; and
- The information we would need in order to decide that this TMD is no longer appropriate.

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. Consumers must refer to the [Customer Account Terms and Conditions](#) and [Credit Guide](#), and their Loan Contract and Financial Table contained therein. These documents will be provided to a consumer prior to the provision of credit. Applicants should also refer to any other information communicated to them as part of the application process. These documents outline the relevant terms and conditions of the product which the consumer should consider when making a decision about this product.

Terms and Conditions to which this target market determination applies

This TMD applies to the PayrightPlus Loan referred to in Customer Account Terms and Conditions, Credit Guide, Loan Contract and the Financial Table contained therein.

2. What is the PayrightPlus Product?

The PayrightPlus Loan Product is an interest bearing, unsecured personal loan, that can be used by consumers to purchase products or services from PayrightPlus accredited Merchants.

The key product attributes of the PayrightPlus Product are:

- Available to individuals to finance their purchases from PayrightPlus accredited Merchants only, from \$2001 up to \$30,000 (dependent on individual merchant accreditation terms).
- A PayrightPlus loan can be repaid over terms ranging from 2 months to 5 years depending on the value of the purchase, the customer's preferences and affordability and merchant accreditation terms and preferences.
- Purchases must be from individuals and must be for a personal purpose .
- Interest bearing, unsecured personal loan with regular repayments, fortnightly or monthly, over a defined loan term. No balloon payment at end-of-term.
- Repayments of interest and principal.
- Interest free periods of up to 6 months may be available (repayments must be made on time to qualify) (approved Payright Merchants only).
- Interest rates are tailored according to applicant's credit history. Lower interest rates for better credit history.
- Customer fees are also payable - Origination fee:
 - \$99 for loans under \$10,000; and
 - \$199 for loans over \$10,000 up to \$30,000
- Monthly loan management fee of \$8 (or \$3.69 per fortnight).
- Late fees are payable if payments are missed - up to \$12.95 per missed payment.
- No fees for early payout.

3. Who is the target market?

Who is the product suitable for?

The PayrightPlus Loan is suitable for consumers who have the following needs, objectives or financial circumstances:

- Are seeking to make a consumer purchase from a Payright accredited merchant for a personal or domestic purpose and wish to spread the cost of that purchase over time with scheduled repayments;
- seeking simple, easily accessible credit options at the point-of-sale;
- are looking for an unsecured personal loan style product to be used for purchases from \$2001 to \$30,000;
- Are seeking an interest rate that is tailored according to the customers demonstrated credit risk, with a transparent and simple fee structure.

- Can demonstrate, at the point of application that their financial circumstances, including income and expenses, allow the customer to meet the repayment obligations under the loan;
- are not experiencing circumstances of personal, lifestyle or financial vulnerability to an extent that would prevent or make it very difficult to meet the repayment obligations of the PayrightPlus Loan product.

The key eligibility requirements of this PayrightPlus Loan product are:

- Customers must be at least 18 years of age and holders of Australian drivers' licence, passport or other Australian Government issued identity documentation as accepted by Payright and from which the customer's identity can be verified.
- Individuals must have a verifiable email address and Australian mobile number and have a source of income.
- Customers must have a current credit file available from Credit Reporting Body, Equifax, free from any defaults, bankruptcy or judgement information.
- Must be able to provide access to Bank Statement information electronically, via Illion Bank Statements, to electronically verify the customer's financial circumstances.
- Must be up to date on any other Payright loans at the time of application for Payright Plus.
- Must be seeking to use the product for a personal, domestic or household purpose.
- Must be seeking to make a purchase from a Payright Merchant accredited to offer PayrightPlus at point-of-sale.

The PayrightPlus Loan product has been developed to provide a solution for customers seeking to finance their purchases from a Payright Merchant that has been accredited to offer PayrightPlus, with an unsecured personal loan with an interest rate that is tailored according to their credit history. This solution allows Payright customers to enjoy their purchases straight away whilst paying for them over time with regular repayment options that are risk and budget appropriate.

Who is this product not suitable for?

The PayrightPlus Loan Product has not been designed for and is not suitable for individuals who:

- Do not meet the key eligibility criteria for PayrightPlus.
- Want a product that provides access to cash or a physical card to make purchases.
- Want a product that allows redraws of credit once repayments have been made (i.e. a revolving credit facility or continuing credit contract).
- Have no source of income and/or who do not have sufficient disposable income to meet their regular repayment obligations.
- Have previously defaulted on a Payright BNPL Product or Loan.
- Are seeking an interest free product or are looking for a secured Personal loan.
- Don't want or are not able to provide access to Bank Statement information electronically, via Illion Bank Statements, to electronically verify their financial circumstances.

- Do not agree to a credit check or are unable to provide suitable credit report for Payright to assess affordability.
- Require credit in an amount less than \$2001 and higher than \$30,000.
- Require credit for a period of less than 2 months or more than 5 years.
- Want to make a purchase from a merchant that is NOT a Payright Merchant.
- Want to make a purchase in the name of a business entity for business related purposes
- Are looking to make purchases which are illegal or for an illegal purpose.
- Are looking to make purchases of gambling and betting products or services or purchases of weapons or firearms or related products and services.

How is this product distributed?

Distribution channels

The PayrightPlus Loan Product is designed to be distributed through the following channels:

- Via accredited Payright Merchants according to their standard sales processes –face-to-face, in-store , or over the phone).

Distribution conditions and why they are appropriate

The PayrightPlus Loan Product is subject to all the following distribution conditions:

- The PayrightPlus Loan Product:
 - Can only be distributed via Payright Merchants accredited to offer PayrightPlus Loans to their customer.
 - Payright accredited merchants sign up to a distribution agreement with Payright which obligates them to meet certain standards and requirements set by Payright.
 - A customer must be seeking to purchase goods or services from a PayrightPlus accredited Payright Merchant and finance that through a PayrightPlus loan at point-of-sale.
 - Payright Merchants cannot offer PayrightPlus to customers if their sale method involves unsolicited sales, sales to consumers or sales to customers not at their business premises (such as door-to-door sales).

This allows Payright to direct the distribution of its product to customers of Payright Merchants whom it believes meet the description of the Payright Target Market. Payright selects its PayrightPlus accredited merchants carefully before accrediting them to ensure their sales practices are appropriate and suitable to be financed via a PayrightPlus Loan. PayrightPlus Payright Merchants are assessed and trained by Payright to ensure they can appropriately offer PayrightPlus at point-of-sale to their customers in line with consumer needs.

- All applications for the PayrightPlus Loan Product must be made by the customer to Payright, online through the Payright application portal but always via the Payright Merchant at the point-of-sale

Application data submitted by the customer is then assessed by Payright according to its credit decisioning logic to determine whether the data supplied by the customer meets the eligibility requirements of Payright's Target Market.

This method of distribution enables Payright to control the application process and direct the distribution of its product to people who are seeking an amount of credit to support their purchase from a Payright Merchant and whose application data indicates they can meet the required repayment terms and that they fall within the Payright Target Market for its PayrightPlus Loan Product.

5. Reviewing this target market determination

Payright will review this TMD in accordance with the below:

Initial review	Within 12 months of the effective date.
Periodic reviews	At least annually unless a review trigger or event necessitates a more frequent review.
Review triggers or events	<p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but is not limited):</p> <ul style="list-style-type: none">• a material change to the design or distribution of the product, including related documentation such as fees, repayment terms, eligibility criteria, loan amount;• occurrence of a significant dealing (e.g. a material (as defined by reference to Payright's Risk Management Framework) increase in the volume or nature of complaints that subsists for a period of 3 or more consecutive months);• distribution conditions found to be inadequate through a material (as defined by reference to Payright's Risk Management Framework) increase in customer decline rates, customer complaints, increase in hardship applications, collections activity, write-offs or account closures that subsist for a period of 3 or more consecutive months and that reasonably suggest that aspects of the TMD may no longer be appropriate;• any change in law, regulatory guidance or industry practice that may impact this TMD;

	<ul style="list-style-type: none"> external events such as adverse media coverage or regulatory attention; any other circumstances Payright may reasonably determine to be a review trigger.
--	--

Where a review trigger has occurred, this TMD will be reviewed within 10 business days.

6. Reporting and monitoring this target market determination

Payright may collect the following information from the distributors in relation to this TMD.

Complaints	<p>Distributors are required to report information about any complaints made to them about the PayrightPlus Loan Product to Payright (including but not limited to):</p> <ul style="list-style-type: none"> Number of complaints; Nature of complaints; Dates and circumstances surrounding the complaints. <p>Payright’s Distributors must direct all customers who wish to complain about the PayrightPlus Loan Product to complain directly to Payright. Payright will then respond to all complaints received from customers in accordance with the Payright Complaints Policy. Distributors are not permitted to respond to or manage any complaints about the PayrightPlus Loan Product directly. Payright will manage and respond to all complaints made by customers and liaise with the Distributors as required.</p>
Significant dealings	<p>Distributors are required to report to Payright if they become aware of a significant dealing occurring in relation to this TMD within 10 business days. A significant dealing may include:</p> <ul style="list-style-type: none"> Significant distribution of the PayrightPlus Loan Product outside the TMD. For example due to falsified application data, merchant or applicant fraud;

	<ul style="list-style-type: none">• Becoming aware of a material and sustained (for a period or 3 or more consecutive months) increase in the volume of complaints concerning the PayrightPlus Loan Product or its distribution.
Other information required	<p>In addition to the information above, distributors will:</p> <ul style="list-style-type: none">• provide any other information reasonably requested by Payright from time to time; and• annually attest to Payright that they have been distributing the PayrightPlus Loan Product in accordance with the terms of this TMD, any application distribution agreement and any training, directions or communications provided by Payright during the reporting period.