

# Target Market Determination

## Personal Loans – Secured

This document is the Target Market Determination (**TMD**) for the Bluebay Home Loans Personal Loan (Secured).

A Target Market Determination (**TMD**) is a written document that:

- describes the class of customers that make up the target market for the Bluebay Home Loans Personal Loan (Secured) (**Target Market**);
- specifies any conditions and restrictions on the distribution of the product (**Distribution Conditions**); and
- sets out the events or circumstances where we are required to review the TMD (**Review Triggers**).

We are required to have a TMD by law. This TMD is not a recommendation to acquire a *Bluebay Home Loans Personal Loan (Secured)* nor does it replace our terms and conditions or other disclosure documents that we or one of accredited brokers (acting under an Australian Credit Licence) (**Distributors**) may provide to you.

Product Type	Personal Loan (Secured)
Issuer ( <b>Bluebay, we, us, our</b> )	Bluebay Home Loans Pty Ltd ACN 127 824 524
Australian Credit License Number	389250
Date TMD approved	5 October 2021
TMD Version	1.0
Initial Review Period	One year after the date of this TMD
Subsequent Review Periods	Every third anniversary of the date of this TMD

## Target Market Description

Product description and key attributes

The Bluebay Home Loans Personal Loan (Secured) is a secured personal loan that may be used for any worthwhile purpose including but not limited to debt consolidation, the purchase of a car or a boat or to pay for a wedding or a holiday.

The key attributes of the Bluebay Home Loans Personal Loan (Secured) are:

- Loan Terms - 1 – 7 years;
- Interest Rates - Fixed for the term of the loan;
- Minimum Loan Amount - \$5,000
- Maximum Loan Amount – varies depending on the customer’s financial circumstances;
- Repayments - weekly, fortnightly or monthly repayments on the day or date that suits the customer
- Disbursements on settlement - unlimited;

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- Early Repayments - at any time without penalty; and
  - Security – acceptable security must be provided.

Fees and charges apply.

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Customers for whom the product is likely to be suitable (**Target Market**)

Bluebay Home Loans considers that customers taking out a Bluebay Home Loans Personal Loan (Secured) are likely to require funds for a variety of worthwhile purposes.

These borrowers are likely to want a loan that provides them with the certainty a fixed interest rate and fixed repayments over a fixed term, and an interest rate that is lower than an unsecured loan.

Customers within the Target Market must be able to be able to make the ongoing loan repayments without substantial hardship and must:

- be prepared to provide security for the loan;
  - be 18 years or over; and
  - be an Australian citizen or resident;
  - not have been bankrupt in the past seven years;
  - be able to demonstrate a good credit history over the past 5 years; and
  - satisfy Bluebay Home Loan's credit criteria.
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Ineligible consumers

The Bluebay Home Loans Personal Loan (Secured) is not appropriate for customers who:

- are under 18 years old;
  - do not meet Bluebay Home Loan's credit criteria;
  - are unable to service the loan repayments;
  - require a loan term of less than 1 year or greater than 7 years;
  - would prefer a variable interest rate;
  - do not want to provide security for the loan; or
  - have defined goals and objectives that are not met by this product.
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Bluebay Home Loans considers that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the Target Market because:

- applicants will only be approved for the purposes set out above; and
- applications will only be approved if the customer meets Bluebay Home Loan's credit assessment criteria.

## Distribution Conditions

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Conditions and restrictions on distribution of the product

The Bluebay Home Loans Personal Loan (Secured) is subject to the following distribution conditions and restrictions:

The Bluebay Home Loans Personal Loan (Secured) may only be distributed:

- via an on-line application;
  - by the customer calling or visiting the Bluebay Home Loans office; or
  - through one of our Distributors, acting in accordance with Bluebay Home Loan's distribution requirements.
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Bluebay Home Loans considers that its Distribution Conditions are appropriate and likely to result in the product being distributed to the Target Market, because:

- Bluebay Home Loans has:
  - a direct employment relationship with staff taking calls or assisting customer who attend our office; and
  - closely monitors its approved Distributors;
- all of our Distributors are appropriately trained to discuss the features of the product with customers; and
- our Distributors understand that applications will not be approved unless they satisfy Bluebay Home Loan's credit assessment criteria.

## Review Triggers

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Circumstances which will result in the product being reviewed	<p>Bluebay Home Loans will review this TMD in the following circumstances.</p> <ul style="list-style-type: none"> <li>• we receive a significant number of complaints in relation to the product</li> <li>• we identify a material adverse customer experience in relation to product appropriateness</li> <li>• there is a material change to the product's key attributes or the manner of distribution</li> <li>• there is a pattern of 'significant dealings' in the product which are inconsistent with the Target Market;</li> <li>• ASIC orders that the distribution of the product cease, or ASIC or AFCA raise concerns about the design and distribution of the product; and</li> <li>• any other event or circumstance that Bluebay Home Loans considers mean that it is appropriate for the TMD to be reviewed.</li> </ul>
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## Review Trigger Reporting Requirements

Distributors must advise Bluebay Home Loans of the following matters within the timeframes specified.

Product complaint data	<p>Information relating to complaints received about the product or the distribution of the product, including:</p> <ul style="list-style-type: none"> <li>• number of complaints,</li> <li>• the identifier of the distributor;</li> <li>• the product name; and</li> <li>• the exact details of the complaint.</li> </ul>	<ul style="list-style-type: none"> <li>• Complaints about the distribution of the product           <ul style="list-style-type: none"> <li>○ quarterly, within 10 business of the end of each March, June, September and December.</li> </ul> </li> <li>• Complaints about the product itself:           <ul style="list-style-type: none"> <li>○ within three business days of becoming aware of the complaint.</li> </ul> </li> </ul>
Significant dealings	Any significant dealing of the product outside the Target Market	As soon as practicable but no later than 10 business days after the Distributor becomes aware of the significant dealing.

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Feedback	Any feedback received about the product or the Distribution Conditions for the product.	As soon as possible, but no later than within 20 business days of the receiving the feedback
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## Record Keeping

Bluebay Home Loans and its Distributors will keep records of the reasonable steps they have taken to ensure that this product is sold in a manner consistent with this TMD.

We will also keep complete and accurate records of

- all versions of the TMD for this product; and
- our decisions, and the reasons for those decisions about:
  - the determination of the TMD for this product;
  - the identification and tracking of review triggers;
  - the setting of review periods, and
  - all other the matters documented in this TMD.