

Realty Assist Australia Pty Ltd

Target Market Determination – SettlementCollect

About this document

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

This document is not to be treated as a full summary of the terms and conditions of our personal loan product., which are set out in our loan terms and conditions which are available on request. You must refer to the relevant loan terms and conditions applicable to the product when deciding about whether or not to take a loan from us. Different terms and conditions apply depending on the amount of the loan you take from us.

When we refer to “us” or “we” in this document it is a reference to us, Realty Assist Australia Pty Ltd which is the issuer of the personal loan product.

Name of Product	SettlementCollect
Name of Issuer	Realty Assist Australia Pty Ltd trading as ‘SettlementCollect’ (“Realty Assist”)
Date of this Target Market Determination	5 October 2021
Overview - Description of Target Market and Product	<p>SettlementCollect is a lending product offered by Realty Assist which offers vendors of Australian real estate early access to part of the settlement proceeds of sale of their property. The loan is only made available after the date on which sale of their property becomes unconditional.</p> <p>This product is suited to a vendor who wishes to access a portion of the equity in their property between the date the sale of their property becomes unconditional and the date on which settlement of the sale of their property takes place.</p> <p>The loan proceeds may be used for the purpose of assisting in buying another property and for any other approved purpose.</p> <p>The product is only provided to consumers who are assessed as eligible to receive it. All consumers must provide required documentation and supporting evidence in their application for the product. Unless the lender’s criteria are met, consumers will not be eligible to receive the product.</p>
Eligibility criteria for our loans	<p>To be eligible for one our loans, you must:</p> <ul style="list-style-type: none">• be aged 18 or over;• be a vendor who wishes to access a portion of the equity from their settlement proceeds between the date the sale of their property becomes unconditional and the date on which settlement of the sale of their property takes place.• meet our eligibility criteria;• produce to us an executed contract of sale;• provide evidence to us that the contract of sale has become unconditional;• use the loan proceeds for the purpose of buying another property and for any other approved purpose;• have sufficient available equity in the property they have sold to borrow against, and• complete our online application process, <p>This product is consistent with the needs and objectives of customers who are seeking fast, flexible and short-term finance.</p>

Exclusion criteria for loans	We will not give you one of our loans if we determine that you are not in our target market or do not meet our eligibility criteria set out above.
Loan Features	<p>Our loans:</p> <ul style="list-style-type: none"> • have an application/ establishment fee; • charge a monthly fee each month during the term of the loan; • allow you to repay the loan at any time without penalty; • have a loan term of a maximum of 62 days; • are repayable on the earlier of: <ul style="list-style-type: none"> ○ the date of settlement of the sale of your property; ○ the date any deposit paid is released to you; ○ 61 days after the initial drawdown of the loan, or ○ if you withdraw from the sale of the property, the date you withdraw, <p>whichever first occurs.</p>
When we will take security for repayment of the loan	<p>We may ask for security for repayment of the loan at any time. The loan contract gives us this right.</p> <p>When we take security for repayment of a loan, we do this by registering a mortgage against your property and/or a caveat.</p>
Consistency between target market and the product	<p>The personal loan products have been designed to suit a wide target market of consumers are property vendors who wish to access a portion of their contractual settlement proceeds early.</p> <p>The loan term is consistent with the purpose of the loan, namely to give early access to settlement proceeds and means that the customer is not paying for the loan beyond it's expected benefit date.</p>
How we distribute the loan product and who are the Distributors	<p>The SettlementCollect product is distributed via estate agents who have been appointed as our distributors and also direct to consumers who submit an application through our digital portal.</p> <p>Where the product is distributed via real estate agents, then the product is only offered to property vendors who have appointed real estate agents that are distributors of the SettlementCollect product on behalf of Realty Assist.</p> <p>The method of distribution of the product makes it likely that a customer using the SettlementCollect product is in the target market and meets our eligibility criteria.</p>
Distribution Conditions	<p>We have distribution conditions in place which are designed to help ensure that our loan product is only sold to consumers in the target market and are likely be consistent with the likely objectives, financial situation and needs of the consumers.</p> <p>We ensure that:</p> <ul style="list-style-type: none"> • our website content gives consistent messaging directed to our target market; • our initial review of application process excludes consumers who, based on objective and measurable criteria, do not meet our eligibility criteria; • our assessment process determines whether a consumer meets our eligibility criteria, and • our review process reviews applications where it is initially unclear or uncertain whether the application meets our eligibility criteria or whether we are prepared to land to the consumer.

Adequacy of distribution conditions and restrictions	<p>We will ensure that:</p> <ul style="list-style-type: none"> • Implementation of suitability and eligibility questions through our proprietary semi-automated application process allows us to identify those applicants who do not meet the criteria for the products prior to any loan offer being made to a consumer. • We make and review our agreements with distribution partners (real estate agents) taking into consideration their access to the target market for our loan product. <p>We will take reasonable steps to ensure that our distribution conditions will, or will be reasonably likely to, result in distribution of our loan product in a manner consistent with this target market determination.</p>													
Timing and process by which we review our Target Market Determination	<p>We will review this target market determination as follows:</p> <table border="1" data-bbox="443 622 1401 1048"> <thead> <tr> <th data-bbox="443 622 852 674">Review Type</th> <th data-bbox="852 622 1401 674">Date of Review</th> </tr> </thead> <tbody> <tr> <td data-bbox="443 674 852 752">Initial review</td> <td data-bbox="852 674 1401 752">Within two years of the date of first issue of this target market determination.</td> </tr> <tr> <td data-bbox="443 752 852 831">First periodic review</td> <td data-bbox="852 752 1401 831">No later than two years after completion of the initial review.</td> </tr> <tr> <td data-bbox="443 831 852 909">Subsequent periodic reviews</td> <td data-bbox="852 831 1401 909">No later than two years after completion of the most recent periodic review.</td> </tr> <tr> <td data-bbox="443 909 852 965">Annual Review Event</td> <td data-bbox="852 909 1401 965">Annually in July each year</td> </tr> <tr> <td data-bbox="443 965 852 1048">Trigger event</td> <td data-bbox="852 965 1401 1048">Within ten (10) business days of the occurrence of a trigger event</td> </tr> </tbody> </table>		Review Type	Date of Review	Initial review	Within two years of the date of first issue of this target market determination.	First periodic review	No later than two years after completion of the initial review.	Subsequent periodic reviews	No later than two years after completion of the most recent periodic review.	Annual Review Event	Annually in July each year	Trigger event	Within ten (10) business days of the occurrence of a trigger event
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Reporting by Distributors	<p>We require our distributors to report to us within thirty (30) days of the end of each quarter (March, June, September and December) each year and provide us with information about the number of complaints received about the product during the immediately preceding quarter.</p> <p>We require our distributors to report to us within thirty (30) days prior to the Initial Review, each Periodic Review and each Annual Review as detailed above on matters specified by us.</p> <p>We require our distributors to report to us within seven (7) days if they receive any complaints about the product.</p>													

<p>Description of events which constitute a “Trigger Event”</p>	<p>A trigger event is any event or circumstance that should objectively give rise to a reasonable belief on our part that this Target Market Determination is no longer appropriate having regard to a variety of factors, including (but not limited) to any of the following:</p> <ul style="list-style-type: none"> • a material change to the design or distribution of the product including related documentation; • the occurrence of a “significant dealing” in relation to our loan product. • the distribution conditions are found to be inadequate or deficient; • the occurrence of external events such as adverse media coverage or regulatory feedback; • significant changes in metrics, including, but not limited to, complaints, hardship applications, arrears and approvals per approved distribution partners; • negative feedback about the loan product received from a Court, ASIC or other regulatory body; • guidance received about the loan product received from a Court, , ASIC or other regulatory body; • a change in legislation which impacts on the design or distribution or the structure of the loan product; or • the value of outstanding loans written off in a financial year being significantly higher than the projection for loans written off loans made at the end of the prior financial year.
<p>Annual Review Event</p>	<p>The following matters constitute an annual review event but do not of themselves necessarily indicate that a trigger event has occurred, namely an event or circumstance has occurred that reasonably suggests that the TMD is no longer appropriate. The occurrence of the following events may merely indicate a change in economic circumstances. However, an annual review of the following matters is to be conducted to determine as accurately as possible the underlying cause of the event. The annual review events are:</p> <ul style="list-style-type: none"> • a material increase in the number and percentage of customers seeking hardship relief as compared to the immediately preceding financial year; • a material increase in the number of responsible lending complaints received during a financial year when compared to the number of complaint received in the immediately preceding financial year.
<p>Availability of this Target Market Determination</p>	<p>We will ensure that this target market determination is made available on our website and available to prospective consumers prior to distribution of this loan product.</p>