

Target Market Determinations

Nimble Australia Pty Ltd ACN 135 501 807

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What is a Target Market Determination?

It's a document that describes the type of customer for which the product is designed (target market), and conditions and circumstances for how the product can be distributed and when it needs to be reviewed.

Why does Nimble need to have Target Market Determinations?

Nimble is required to have Target Market Determinations under the *Treasury Laws Amendment* (Design and Distribution Obligations and Product Intervention Powers) Act 2019. This Act sets out obligations to ensure a customer-centric approach to designing, marketing and distributing financial products.

Target Market Determinations

Target Market Determination for Nimble Small Loans



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 credit product has been designed, having regard to the objectives, financial situation and needs of the target market.

The TMD will also describe how the product is distributed, when this document will be reviewed and what information is required to be provided to help maintain the accuracy of this document.

The product is issued by Nimble Australia Pty Ltd. More information about this product is contained on Nimble's website (nimble.com.au). Consumers should consider whether the product is appropriate for them before making any decision about whether to apply for or enter into the product.

This document is not a product disclosure statement and is not to be treated as a full summary of the product's terms and conditions. It has been prepared without taking into account any person's particular objectives, financial situation or needs and is not intended to provide financial advice. Consumers should consider the product's full terms and conditions when making a decision about this product.

Who this product is designed for

The Nimble Small Loan has been designed for customers who:

- require a loan for an amount between \$300 and \$2,000 (or, where the initial request is for a higher amount, are willing to accept a loan between those amounts) for an eligible purpose as dictated by our credit policy;
- are seeking a loan that is repayable over a fixed term of between 9 weeks and 39 weeks, with the scheduled term to be agreed in the credit contract;
- do not want a revolving or continuing line of credit or a long term credit contract that is repayable over a number of years;
- are currently working and residing in Australia;
- require the loan proceeds to be promptly disbursed to their nominated bank account;
- are willing to apply online and provide Nimble with access to their bank transaction history and credit history to help us assess their application.

Who this product is not suitable for

This product is not suitable for customers who:

- are unable to access the internet;
- require a loan for an amount less than \$300 or more than \$2,000;
- are seeking an ongoing credit limit that may be drawn down as required from time to time;
- are unlikely to be able to meet their payment obligations under the loan either at all or only with substantial hardship;
- are unemployed or receive more than 50% of their income from Government benefits;
- require a longer term loan that can be repaid over more than 39 weeks;
- wish to allocate more than 10% of their net income towards SACC repayments;
- are under 18 years of age.

Distribution conditions

An application for a Nimble small loan can only be made via the Nimble website or mobile app, with support provided by employees in Nimble's contact centre where required. Nimble employees can only provide assistance in relation to an application for a Nimble Small Loan if they have received adequate training and

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they must follow Nimble's applicable policies and processes. The online application assessment process includes a number of questions that help to determine if the applicant is within the target market for this product. The information provided by the applicant during the application process will be used to determine if the customer falls within the target market, whether we will offer to provide a loan to the customer and, if so, for what range in amount and loan term. The customer should always answer these questions accurately and check with Nimble if they are not sure what a question means.

Additionally, the product may be promoted to the target market via comparison websites such as Finder. These third party websites provide information about the product on their website and provide consumers with an opportunity to make an application through an electronic link. Any such applications must be completed and processed via our online application process, which contains the questions set out above used to determine if the applicant is within the target market for this product, whether we will offer to provide a loan to the customer and, if so, for what range in amount and loan term.

These conditions make it likely that Nimble Small Loans will only be offered to customers within the target market for this product because:

- any comparison websites are vetted and authorised by Nimble;
- Nimble's employees have knowledge of the product terms and conditions and the product TMD;
 Nimble's processes are designed to identify instances where a customer falls outside the target market; and
- Nimble has the sole determination of whether a consumer acquiring the product meets the eligibility criteria, assessed according to the consumer's requirements and objectives.

Reviewing this document

Nimble, as the issuer and distributor of this product, collects information and prepares reports regarding loan volumes, average loan amounts, default rates, complaints and any occasions where this product has been provided contrary to the TMD on an at least annual basis to help improve our products and services.

We will review this TMD if:

- there is a material change to the design or distribution of the product, including the terms and
 conditions applicable to the product or other related documentation, or on there being a relevant
 amendment to the National Consumer Credit Protection Act or any associated law which has the
 effect of altering the rules relating to the provision of small amount credit contracts;
- we amend or introduce other ways in which this product can be provided or distributed;
- the number of funded complaints received from customers as a percentage of total funded loans is greater than 5% in any given calendar quarter;
- in respect of the total funded loans in any given calendar quarter, the total number of hardship applications received from those funded customers exceeds 5%;
- the total outstanding balance of payments more than 14 days overdue as a percentage of total amount originated is greater than 8% in any given calendar quarter;
- there is an external event such as adverse media coverage or regulatory attention;
- the business performance and value provided by the product indicates that the TMD is no longer appropriate, having regard to appropriate data such as customer demand for the product, loan volumes, application approval rates, customer default or loss rates and the nature and number of customer complaints;
- we identify that there has been a significant dealing in the product that is not consistent with the TMD, by detecting that more than 5% of the consumers receiving our product in any given calendar quarter are not within our target market based on specific complaint information; and
- if any external source such as ASIC, AFCA, or community based consumer organisations communicate to us that they have identified a systemic issue or if the number of complaints referred to AFCA or by community based organisations is greater than 15 in any given calendar quarter.

Our review will occur within 10 business days of any of the above events occurring.

In any event, a review of this TMD will be completed no later than six months from the publication date of this TMD and subsequently at twelve month intervals.





In the event that distributors (other than Nimble) engage in retail product distribution, the following information must be provided to Nimble by distributors who engage in that retail product distribution in relation to this product:

Type of information	Description	Reporting period
Specific Complaints	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.
Complaints	Number of complaints	Every 3 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware

Questions?

If you have any questions about our credit products or this TMD, please contact us on 133 156 or by email at customercare@nimble.com.au

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Issuer: Nimble Australia Pty Ltd (ACN 135 501 807, ACL 386010)

DUE

Target Market Determination for Nimble Medium Personal Loans

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 credit product has been designed, having regard to the objectives, financial situation and needs of the target market.

The TMD will also describe how the product is distributed, when this document will be reviewed and what information is required to be provided to help maintain the accuracy of this document.

The product is issued by Nimble Australia Pty Ltd. More information about this product is contained on Nimble's website (nimble.com.au). Consumers should consider whether the product is appropriate for them before making any decision about whether to apply for or enter into the product.

This document is not a product disclosure statement and is not to be treated as a full summary of the product's terms and conditions. It has been prepared without taking into account any person's particular objectives, financial situation or needs and is not intended to provide financial advice. Consumers should consider the product's full terms and conditions when making a decision about this product.

Who this product is designed for

The Nimble Medium Personal Loan has been designed for customers who:

- require a loan for an amount between \$2,050 and \$10,000 for an eligible purpose as determined by our credit policy;
- are seeking a loan that is repayable over a fixed term of between 2 months and 23 months, with the scheduled term to be agreed in the credit contract;
- do not want a revolving or continuing line of credit or a long term credit contract that is repayable over more than 23 months;
- are employed;
- require the loan proceeds to be promptly disbursed to their nominated bank account;
- are willing to apply online and provide Nimble with access to their bank transaction history and credit history to help us assess their application.

Who this product is not suitable for

This product is not suitable for customers who:

- require a loan for an amount less than \$2,050 or more than \$10,000;
- are seeking an ongoing credit limit that may be drawn down as required from time to time;
- are unlikely to be able to meet their payment obligations under the loan either at all or only with substantial hardship;
- are unemployed or receive more than 50% of their income from Government benefits;
- require a longer term loan that can be repaid over more than 23 months;
- are under 18 years of age.

Distribution conditions

An application for a Nimble Medium Personal Loan can only be made via the Nimble website, with support provided by employees in Nimble's contact centre where required. Nimble employees can only provide assistance in relation to an application for a Nimble Medium Personal Loan if they have received adequate training and they must follow Nimble's applicable policies and processes. The online application assessment process includes a number of questions that help to determine if the applicant is within the target market for this product. The information provided by the applicant during the application process will be used to determine if we will offer to provide a loan to the customer and, if so, for what amount and loan term. The

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customer should always answer these questions accurately and check with Nimble if they are not sure what a question means.

Additionally, the product may be promoted to the target market via comparison websites such as Finder. These third party websites provide information about the product on their website and provide consumers with an opportunity to make an application through an electronic link. Any such applications must be completed and processed via our online application process, which contains the questions set out above used to determine if the applicant is within the target market for this product, whether we will offer to provide a loan to the customer and, if so, for what range in amount and loan term.

These conditions make it likely that Nimble Medium Personal Loans will only be offered to customers within the target market for this product because:

- any comparison websites are vetted and authorised by Nimble:
- Nimble's employees have knowledge of the product terms and conditions and the product TMD;
 Nimble's processes are designed to identify instances where a customer falls outside the target market; and
- Nimble has the sole determination of whether a consumer acquiring the product meets the eligibility criteria, assessed according to the consumer's requirements and objectives.

Reviewing this document

Nimble, as the issuer and distributor of this product, collects information and prepares reports regarding loan volumes, average loan amounts, default rates, complaints and any occasions where this product has been provided contrary to the TMD on an at least annual basis to help improve our products and services.

We will review this TMD if:

- there is a material change to the design or distribution of the product, including the terms and conditions applicable to the product or other related documentation, or on there being a relevant amendment to the National Consumer Credit Protection Act or any associated law which has the effect of altering the rules relating to the provision of medium amount credit contracts;
- we amend or introduce other ways in which this product can be provided or distributed;
- the number of funded complaints received from customers as a percentage of total funded loans is greater than 5% in any given calendar quarter;
- in respect of the total funded loans in any given calendar quarter, the total number of hardship applications received from those funded customers exceeds 5%;
- the total outstanding balance of payments more than 14 days overdue as a percentage of total amount originated is greater than 8% in any given calendar quarter;
- there is an external event such as adverse media coverage or regulatory attention;
- the business performance and value provided by the product indicates that the TMD is no longer appropriate, having regard to appropriate data such as customer demand for the product, loan volumes, application approval rates, customer default or loss rates and the nature and number of customer complaints;
- we identify that there has been a significant dealing in the product that is not consistent with the TMD, by detecting that more than 5% of the consumers receiving our product in any given calendar quarter are not within our target market based on specific complaint information; and
- if any external source such as ASIC, AFCA, or community based consumer organisations communicate to us that they have identified a systemic issue or if the number of complaints referred to AFCA or by community based organisations is greater than 15 in any given calendar quarter.

Our review will occur within 10 business days of any of the above events occurring.

In any event, a review of this TMD will be completed no later than six months from the publication date of this TMD and subsequently at twelve month intervals.





In the event that distributors (other than Nimble) engage in retail product distribution, the following information must be provided to Nimble by distributors who engage in that retail product distribution in relation to this product:

Type of information	Description	Reporting period
Specific Complaints	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.
Complaints	Number of complaints	Every 3 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware

Questions?

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Target Market Determination for Nimble AnyTime Virtual Mastercard

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 credit product has been designed, having regard to the objectives, financial situation and needs of the target market.

The TMD will also describe how the product is distributed, when this document will be reviewed and what information is required to be provided to help maintain the accuracy of this document.

The product is issued by Nimble Australia Pty Ltd. More information about this product is contained on Nimble's website (nimble.com.au), which contains full details of the product terms and conditions. Consumers should consider whether the product is appropriate for them before making any decision about whether to apply for or enter into the product.

This document is not a product disclosure statement and is not to be treated as a full summary of the product's terms and conditions. It has been prepared without taking into account any person's particular objectives, financial situation or needs and is not intended to provide financial advice. Consumers should consider the product's full terms and conditions when making a decision about this product.

Who this product is designed for

The Nimble AnyTime Virtual Mastercard has been designed for customers who:

- require a loan with a credit limit between \$1,000 and \$10,000;
- are seeking a revolving line of credit that provides ongoing access to a credit limit, provided that repayments are made on time;
- want the certainty of a fixed periodic repayment amount;
- want the flexibility to either use the Virtual Mastercard for purchases at the point of sale or online or draw down some or all of their available balance to their bank account;
- are willing to apply online and provide Nimble with access to their bank transaction history and credit history to help us assess their application.

Who this product is not suitable for

This product is not suitable for customers who:

- require a credit limit that is less than \$1,000 or more than \$10,000;
- are seeking a loan that is fully repayable over a fixed term;
- are unlikely to be able to meet their payment obligations under the loan either at all or only with substantial hardship;
- are unemployed or receive more than 50% of their income from Government benefits;
- require a longer term loan that can be repaid over a number of years;
- are under 18 years of age.

Distribution conditions

An application for a Nimble AnyTime Virtual Mastercard can only be made via the Nimble website, with support provided by employees in Nimble's contact centre where required. Nimble employees can only provide assistance in relation to an application for a Nimble loan if they have received adequate training and they must follow Nimble's applicable policies and processes. The online application assessment process includes a number of questions that help to determine if the applicant is within the target market for this product. The information provided by the applicant during the application process will be used to determine if we will offer to provide a loan to the customer and, if so, for what amount and loan term. The customer



should always answer these questions accurately and check with Nimble if they are not sure what a question means.

Additionally, the product may be promoted to the target market via comparison websites such as Finder. These third party websites provide information about the product on their website and provide consumers with an opportunity to make an application through an electronic link. Any such applications must be completed and processed via our online application process, which contains the questions set out above used to determine if the applicant is within the target market for this product, whether we will offer to provide a loan to the customer and, if so, for what range in amount and loan term.

These conditions make it likely that the Nimble AnyTime Virtual Mastercard will only be offered to customers within the target market for this product because:

- any comparison websites are vetted and authorised by Nimble:
- Nimble's employees have knowledge of the product terms and conditions and the product TMD;
 Nimble's processes are designed to identify instances where a customer falls outside the target market; and
- Nimble has the sole determination of whether a consumer acquiring the product meets the eligibility criteria, assessed according to the consumer's requirements and objectives.

Reviewing this document

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We will review this TMD if:

- there is a material change to the design or distribution of the product, including the terms and
 conditions applicable to the product or other related documentation, or on there being a relevant
 amendment to the National Consumer Credit Protection Act or any associated law which has the
 effect of altering the rules relating to the provision of continuing credit contracts;
- we amend or introduce other ways in which this product can be provided or distributed;
- the number of funded complaints received from customers as a percentage of total funded loans is greater than 5% in any given calendar quarter;
- in respect of the total funded loans in any given calendar quarter, the total number of hardship applications received from those funded customers exceeds 5%;
- the total outstanding balance of payments more than 14 days overdue as a percentage of total amount originated is greater than 8% in any given calendar quarter; ;
- there is an external event such as adverse media coverage or regulatory attention;
- the business performance and value provided by the product indicates that the TMD is no longer appropriate, having regard to appropriate data such as customer demand for the product, loan volumes, application approval rates, customer default or loss rates and the nature and number of customer complaints;
- we identify that there has been a significant dealing in the product that is not consistent with the TMD, by detecting that more than 5% of the consumers receiving our product in any given calendar quarter are not within our target market based on specific complaint information; and
- if any external source such as ASIC, AFCA, or community based consumer organisations communicate to us that they have identified a systemic issue or if the number of complaints referred to AFCA or by community based organisations is greater than 15 in any given calendar quarter.

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