

Target Market Determination Freestyle Virtual Mastercard

This Target Market Determination (TMD) has been prepared in accordance with the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019 (Cth)* and associated Regulations. TMDs are designed to assist issuers to ensure that the financial products they issue are likely to be consistent with the *likely objectives, financial situation and needs* of the consumers for whom they are intended (the target market) and to assist distributors to ensure that financial products are distributed to the target market.

This TMD is general in nature and should not be construed as financial advice. Consumers should obtain independent advice prior to acquiring the product to ensure that it is appropriate for their particular *objectives, financial situation and needs*.

Product	Freestyle Virtual Mastercard
Issuer	MoneyMe Financial Group Pty Limited ACN 163 691 236, Australian Credit Licence 442218
Date of TMD	5 October 2021
Target Market	<p><i>Description of target market, including their likely objectives, financial situation and needs</i></p> <p>The product has been assessed as meeting the <i>likely objectives, financial situation and needs</i> of consumers who:</p> <ul style="list-style-type: none"> • meet our eligibility criteria, including (but not limited to): <ul style="list-style-type: none"> – are 18 years of age or older; – are employed on a permanent or casual basis; – are a permanent resident of Australia or having an acceptable work visa (as determined by us); • require a line of credit facility linked to a virtual Mastercard on their mobile device which enables them to finance ongoing purchases both online and in-store; • require a line of credit facility which allows them to transfer funds directly to a nominated bank account; • require the flexibility to pay down their balance without charge and make additional purchases or withdraw funds up to the credit limit; • require flexible repayment options, including either fortnightly or monthly repayment cycles; • want to take advantage of up to a 55 day interest free period for purchases; • can manage potential fluctuations in interest rate and repayments associated with a variable interest rate; and • are able to complete an online application process. <p><i>Description of product, including key attributes</i></p>

The product is a revolving line of credit, which includes a virtual Mastercard that allows consumers to make purchases using their mobile device up to an approved credit limit.

The product's key attributes include the following:

- General specifications

Minimum credit limit	\$1,000
Maximum credit limit	\$20,000
Standard daily credit limit	\$3,000
Minimum amortisation period	2 years
Maximum amortisation period	5 years

- Fees and charges

Interest rate type	Variable
Interest rate	Risk based rate. Interest free period applies (up to 55 days) if the outstanding balance is repaid
Annual Fee	<ul style="list-style-type: none"> • \$0 (credit limit between \$1,000 and \$3,000) • \$49 (credit limit between \$3,001 and \$5,000) • \$149 (credit limit between \$5,001 and \$20,000)
Monthly fee	<ul style="list-style-type: none"> • \$0 (if outstanding balance under \$20) • \$5 (if outstanding balance over \$20)
Other fees payable	<ul style="list-style-type: none"> • Withdrawal Fee • Dishonour Fee • Overdue account Fee • Disputed transaction Fee • International transaction Fee • Card fee (dependant on card provider and method of payment)

Classes of consumers for whom the product may be unsuitable

The product may not be suitable for consumers who:

- do not meet our eligibility criteria;
- require a loan to purchase a single product; and/or
- require the certainty of a fixed interest rate and fixed repayments for a fixed term.

Explanation of why the product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market

	<p>The product is likely to be consistent with the <i>likely objectives, financial situation and needs</i> of consumers in the target market because it provides a credit solution for consumers who are seeking to finance ongoing purchases whilst having the ability to redraw and transfer funds on credit up to an approved credit limit. This allows consumers to defer upfront costs, repay the balance over an extended period, and manage repayments consistent with their financial situation. Additionally, consumers may make early repayments without charge, and receive up to 55 days interest free on purchases.</p>								
<p>Distribution Conditions</p>	<p><i>Distribution conditions</i></p> <p>The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:</p> <table border="1" data-bbox="424 651 1391 1234"> <thead> <tr> <th data-bbox="424 651 627 730">Distribution channel</th> <th data-bbox="633 651 1067 730">Type of distributor</th> <th data-bbox="1074 651 1391 730">Condition/restriction</th> </tr> </thead> <tbody> <tr> <td data-bbox="424 739 627 808">Direct to consumer</td> <td data-bbox="633 739 1067 808">Online application via a website</td> <td data-bbox="1074 739 1391 1234" rowspan="2">All applications must be completed and processed by us via our online application process, which contains knock-out questions and flags to determine whether a consumer falls within the target market</td> </tr> <tr> <td data-bbox="424 817 627 1234">Third party distributors</td> <td data-bbox="633 817 1067 1234"> <ul style="list-style-type: none"> • Comparison websites: Provide information about the product on their website and provide consumers with an opportunity to make a direct application through an electronic link. • Lead generation partners: Notify consumers that they may be eligible for a MoneyMe product and supply a link to complete a direct-to-consumer application. </td> </tr> </tbody> </table> <p><i>Why the distribution conditions and restrictions will make it more likely that the consumers who acquire the product are in the target market</i></p> <p>The distribution channels and conditions are appropriate because:</p> <ul style="list-style-type: none"> • the product has a wide target market; • we rely on existing distributors, methods, controls and supervision already in place; • our sales staff and third party distributors are required to undertake training prior to assisting applicants, and must follow documented procedures, including screening consumers prior to an application to determine whether they fall within the target market; and • our approval system has checks and controls in place to ensure that the product is only distributed to consumers in the target market. 	Distribution channel	Type of distributor	Condition/restriction	Direct to consumer	Online application via a website	All applications must be completed and processed by us via our online application process, which contains knock-out questions and flags to determine whether a consumer falls within the target market	Third party distributors	<ul style="list-style-type: none"> • Comparison websites: Provide information about the product on their website and provide consumers with an opportunity to make a direct application through an electronic link. • Lead generation partners: Notify consumers that they may be eligible for a MoneyMe product and supply a link to complete a direct-to-consumer application.
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<p>Review Triggers</p>	<p>The following events are review triggers that would reasonably suggest that the TMD is no longer appropriate:</p> <ul style="list-style-type: none"> • A significant dealing of the product to consumers outside the target market occurs. • A significant number of complaints are received from consumers in relation to the product. • There is a material change to the product or the terms and conditions. 								

	<ul style="list-style-type: none"> • There is a material number of <ul style="list-style-type: none"> – hardship applications; – overdue loans; and/or – defaults. • There is a significant change to Australian credit laws that affect the product. 												
Review Periods	<p>Last review date: 29 August 2022.</p> <p>Periodic reviews: Every 12 months after the initial and each subsequent review.</p> <p>Trigger reviews: Review to be completed within 10 business days of the identification of a trigger event.</p>												
Distribution Information Reporting Requirements	<p>The following information must be provided to us by distributors who engage in retail product distribution conduct in relation to the product:</p> <table border="1" data-bbox="419 813 1380 1344"> <thead> <tr> <th data-bbox="419 813 699 891">Type of information</th> <th data-bbox="707 813 1074 891">Description</th> <th data-bbox="1082 813 1380 891">Reporting period</th> </tr> </thead> <tbody> <tr> <td data-bbox="419 891 699 1093">Specific complaints</td> <td data-bbox="707 891 1074 1093">Details of the complaint, including the name and contact details of the complainant and the substance of the complaint</td> <td data-bbox="1082 891 1380 1093">As soon as practicable, and in any event within 10 business days of receipt of the complaint</td> </tr> <tr> <td data-bbox="419 1093 699 1144">General complaints</td> <td data-bbox="707 1093 1074 1144">Number of complaints</td> <td data-bbox="1082 1093 1380 1144">Every 3 months</td> </tr> <tr> <td data-bbox="419 1144 699 1344">Significant dealing(s)</td> <td data-bbox="707 1144 1074 1344">Date or date range of the significant dealing(s) and a description of the significant dealing (eg, why it is not consistent with the TMD)</td> <td data-bbox="1082 1144 1380 1344">As soon as practicable, and in any event within 10 business days after becoming aware of the significant dealing</td> </tr> </tbody> </table>	Type of information	Description	Reporting period	Specific complaints	Details of the complaint, including the name and contact details of the complainant and the substance of the complaint	As soon as practicable, and in any event within 10 business days of receipt of the complaint	General complaints	Number of complaints	Every 3 months	Significant dealing(s)	Date or date range of the significant dealing(s) and a description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any event within 10 business days after becoming aware of the significant dealing
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