

Target Market Determination

hum90 Platinum Mastercard Australia

Version 1 dated September 2021

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* and associated Regulations. TMDs are designed to assist issuers to ensure that 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.

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

Product	hum90 Platinum Mastercard
Reference documents	Complimentary Insurance Ts&Cs, Brand Crush T&Cs, Conditions of Use, Product Fees & Charges, Key Facts Sheet, Self Service Ts&Cs, WRAP Ts&Cs, Apply Pay Terms of Use, Google Play Terms of Use, Website Terms
Issuer	hum Cards Pty Ltd ABN 31 099 651 877 Australian Credit Licence number 247415
Date of TMD	September 2021
Target Market	<p><i>Description of target market, including their likely objectives, financial situation and needs</i></p> <p><u>hum90 with basic features</u></p> <p>When issued to consumers with its basic features, 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"> • are over 18 years of age; • earn at least \$25,000 per year; • have a good credit rating; and • require the ability to make everyday credit card purchases and also have access to: <ul style="list-style-type: none"> ○ up to 110 days interest free on purchases with competitive interest rates, annual fee and charges; ○ free purchase and price protection insurance for purchases on the card; ○ interest free instalment plan features which allow purchases to be repaid over an agreed number of fixed monthly repayments; ○ long term interest free options on purchases with authorised distributors. <p>The hum90 product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market because it provides a high level of flexibility with up to 110 days interest free on purchases, fixed instalment plan repayment options and a number of long term interest free repayment options for purchases through authorised distributors.</p> <p>The product's key features enable the target market to satisfy its needs and objectives at a reasonable and affordable cost (note the interest rates for this product are in line with other premium credit cards in the market).</p>

When issued to consumers with optional features, the product has been assessed as meeting the *likely objectives, financial situation and needs* of the following sub-sets of the target market for whom the basic product would be appropriate.

Long Term Interest Free. humm90//WRAP and other Fixed Instalment Plans

These product features are designed for consumers who:

- meet the product eligibility criteria (refer above);
- wish to repay for a purchase interest free over a longer period of time up to 60 months;
- require the flexibility to spread repayments over time for a larger purchase (interest free), in some instances for a small establishment fee.

humm90//CASH

This product feature is designed for consumers who:

- meet the product eligibility criteria (refer above);
- require the flexibility to finance their purchases through digital payments and physical cash payments;
- wish to purchase goods and services which are only available by cash for a lower cost than obtaining cash on a standard credit card which attracts a high cash advance interest rate; and
- can repay the cash amount advanced over an agreed number of fixed monthly instalments over a term which is often shorter than the minimum term required for other products, such as personal loans.

Class of consumers for whom the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the product eligibility requirements; or
- are looking for a reward points credit card, low rate or low fee credit card.

We have assessed that this product is not suitable for customers looking for reward points for spend, or a low rate or low fee credit card.

Description of product, including key attributes

humm90 is a platinum Mastercard offering the following key features:

- shop through a digital card sent to digital wallet for immediate spend and before a physical card is activated to allow tap and pay through digital channels;
- up to 110 days interest free on card purchases;
- optional instalment plans through humm90//WRAP – where a customer can convert a purchase of \$250 or more into 9, 12 or 15 month instalment plans for a 3, 4 or 5% fee respectively;
- optional cash deposits of \$250 or more to a bank account through humm90//CASH – where eligible customers can repay cash amounts over 9, 12 or 15 month instalment plans for a 3, 4 or 5% fee respectively;
- flexible interest free payment options for purchases through long-term interest free (from 12 to 60 months) or through interest free fixed instalment plans (up to 60 months) through authorised distributors;
- discounts through weekly Brand Crush 10% cash back offers;
- platinum benefits including free purchase and price protection insurance; and

	<ul style="list-style-type: none"> • humm90 Purchase Rate of 23.99%, Expired Promotional Rate of 25.99%, (payable on outstanding balances after any Interest Free Period in relation to a Promotional Offer) with an annual fee of \$99.
Distribution Conditions	<p><i>Distribution conditions</i></p> <p>The following distribution channels have been assessed as being appropriate to direct the distribution of the product to the target market:</p> <ul style="list-style-type: none"> • direct to consumer – through online application via humm90 website and application through humm90 call centre; or • distributors in-store through humm90 online Seller Portal. <p>Distribution of the product is subject to the following restrictions:</p> <ul style="list-style-type: none"> • the product must not be distributed to consumers who do not meet the product's eligibility criteria (stated above). This is controlled via humm90's online, phone and Seller Portal origination and application process so that only customers who meet the eligibility criteria and are within the target market can obtain the humm90 product; and • the product's optional features (e.g. humm90//CASH) are subject to further pre-screening and are only displayed in web self-service and/or the mobile app to customers who meet the eligibility criteria for the optional features. <p>The distribution channels are appropriate because:</p> <ul style="list-style-type: none"> • our distributors have been trained by us to understand their DDO obligations; • applications for humm90 can only be approved by humm90; and • humm90's approval system has controls in place to flag applicants who may be outside the target market.
Review Triggers	<p>The following review triggers would reasonably suggest that the TMD may no longer be appropriate:</p> <ul style="list-style-type: none"> • repetitive and/or systemic complaints of the same type about humm90 or a feature of humm90, for example: <ul style="list-style-type: none"> ○ the fees and interest rates that apply; or ○ how payment options work including long-term interest free and fixed instalment plans; • there is a material change to the product or the terms and conditions of the product which may suggest that the TMD may no longer be appropriate e.g. reducing the interest free days or removing the long term interest free options; • information on humm90 consumer behaviour and feedback indicate a large number of consumers who obtained humm90 were specifically looking for a rewards credit card, low rate or low fee credit card; • there is a significant dealing in the product outside the target market; and/or • there is a material increase in levels of hardship, and/or complaints progressing to internal dispute resolution or external dispute resolution.
Review Periods	<p><i>First review date:</i> 1 April 2022</p> <p><i>Periodic reviews:</i> every 12 months after the initial and each subsequent review.</p> <p><i>Trigger review:</i> review to be completed within 10 business days of the identification of a trigger event.</p>

Distribution Information Reporting Requirements

The following information must be provided to humm cards Pty Ltd by distributors who engage in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
Specific Complaints	Subject to availability, details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 5 business days of receipt of complaint.
General information about Complaints	Number of complaints, originating channel and general feedback relating to the product and its performance	Every 6 month reporting period.
Significant dealing(s) where the distributor believes that a significant number of customers outside the target market or for whom humm90 may not be suitable are obtaining humm90.	Date or date range of the significant dealing(s) and description of the significant dealing (e.g, customers looking predominantly for a rewards credit card are obtaining the product)	As soon as practicable, and in any case within 10 business days after becoming aware