Target Market Determination

Finance by Travel and Leisure – Personal loan (principal and interest)

1. About this document

A target market determination (**TMD**) describes the customers that this product is targeted at and any conditions around the way in which the product is distributed to customers.

2. Issuer

Finance by Travel and Leisure Pty Ltd ACN 091 790 993 Australian Credit Licence 391772 (FbTL)

3. Date from which this TMD is effective

5 October 2021

4. Class of customers that fall within this target market

This product is targeted toward customers whose likely needs, objectives and financial situation (as listed below) are aligned with the product's key attributes.

Product description

Key product attributes are:

- A fixed interest rate which means repayments are fixed for the term of the loan
- No penalty for additional repayments or early payout
- Additional payments are not available to be redrawn (no top up facility)
- Security in the form of a mortgage or charge over any interests in Club Wyndham South Pacific ARSN 092 334 015 (*Club Wyndham*) purchased with the proceeds from the personal loan

Objectives and needs

This product has been designed for individuals who:

- Have an objective of wanting a personal loan (with a term of up to 15 years) for the purpose of purchasing interests in Club Wyndham;
- Who can provide the interests in Club Wyndham as security for the personal loan;
- Who want a product that provides the certainty of a fixed rate and a fixed term; and
- Who want the option of making extra repayments without a fee or other penalty.

Financial situation

Customers will be required to satisfy FbTL's credit assessment criteria which includes demonstrating the capacity to make the required repayments as well as certain eligibility criteria including the following:

- An individual aged 18 years or over;
- Have an Australian residential address and be an Australian citizen or personal resident or eligible nonresident visa holder; and
- Be an Australian, New Zealand or Fijian citizen, permanent resident or non-resident visa holder (or if residing elsewhere internationally demonstrate ability to service a loan product in New Zealand or Australian currency).

Excluded class of consumers

This product has not been designed for individuals who:

- Do not meet the eligibility criteria;
- Do not satisfy FbTL's credit assessment criteria;
- Want a personal loan term that exceeds 15 years; or
- Who have defined goals and objectives that are not met by this product.

Consistency between target market and the product

The product is likely to be consistent with the objectives, needs and financial situation of the class of customers in the target market, as the key terms, features and attributes of the product is consistent with the identified class of customer.

5. How this product is to be distributed

Distribution channels

This product is designed to be distributed through the following means:

• Direct distribution only by authorised representatives of FbTL via sales site, online or telephone.

Distribution conditions

This product should only be distributed under the following circumstances:

• The product can only be marketed by the Distributor in accordance with an authorisation under the Issuer's Australian credit licence.

Adequacy of distribution conditions and restrictions

All applications for the product are subject to FbTL's credit assessment and eligibility criteria which is verified by FbTL before approval, and it is therefore unlikely that any product would be issued to any customer that is not in the target market.

6. Reviewing this TMD

We will review this TMD in accordance with the below:

Review periods	Initial review within 12 months of the effective date.	
Periodic reviews	At least every 2 years from the initial review, including any intervening review triggers.	
Review triggers or events	 At least every 2 years from the initial review, including any intervening review triggers. A review trigger or other event or circumstance that arise that would suggest the TMD is no longer appropriate. Review triggers may include (but not limited): a material change to the design of the product or product terms and conditions which would cause the TMD to no longer be appropriate for the product; a significant dealing or pattern of dealings in the product to customers that is no consistent with this TMD; unusual patterns or clusters of hardship arrangements which show that the TM may no longer be appropriate; Significant changes in the law or regulatory compliance that could materially affect the product's design or distribution or direction of ASIC to cease product 	

Where a review trigger has occurred, this TMD will be reviewed within 10 business days.

7. Reporting and monitoring this TMD

We will collect the following information from our distributors in relation to this TMD.

Reporting requirement		Reporting period
	Distributors must report all complaints in relation to the product received from customers	Within 10 business days following the complaint
Significant dealings	significant dealing in relation to this TMD	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing