

# **Target Market Determination**

## **Circlepay Technologies Pty Ltd ACN 647 570 563**

Last updated: 19 March 2023

This Target Market Determination (TMD) has been prepared by Circlepay Technologies Pty Ltd (Circlepay) in compliance with our Design and Distribution Obligations under Part 7.8A of the Corporations Act 2001. This TMD applies to our Circlepay Cash Out product.

### **The Target Market for Our Product**

The target market for our product is consumers who:

- Need small amounts of credit between \$25 and \$200 to assist in paying expenses and managing their cash flow.
- Want a quick and easy application process that can be completed through a mobile app.
- Want product pricing that is transparent and easy to understand.
- Want fast access to funds, ideally within 24 hours of approval.
- Have a regular source of income and can afford the repayments without experiencing financial hardship.
- Want to avoid long-term debt and prefer short-term loans.

### **Key Attributes of Our Product**

The key attributes of our product that meet the needs of our target market are:

- Loan amounts ranging from \$25 to \$200.
- One-time fixed fee of 5% of the loan amount.
- Repayment terms of less than 62 days
- Fast application and approval process through our mobile app with funds available within 24 hours after approval.
- Customer support available via email.

### **Distribution Channels and Conditions**

Our distribution channels and conditions to ensure that our product is distributed appropriately to its target market are:

- Our website and mobile app contain no misleading information, and the application process is easy to follow with informed choices at every stage.
- Our advertisements are clear, transparent, and in plain easily understood language.
- We have adopted voluntary distribution conditions, including not lending to customers below 18 years of age or whose only source of income is government benefits, requiring a minimum income of \$175 per week, and ensuring that all loans are distributed in compliance with our responsible lending policy.

### **Review Triggers**

We will review this TMD if the following occurs in relation to our product:

- Key attributes of the Product are changed and such change requires the TMD to be updated.
- The number of defaults in a 3-month period increases by 20%.
- The number of complaints from approved customers in a 3-month period increases by 20%.
- External sources, such as ASIC or community-based consumer organisations, raise concerns about our product.

### **Periodic Scheduled Reviews**

We will conduct periodic scheduled reviews of this TMD every six months to ensure that our product continues to meet the needs of our target market and comply with our Design and Distribution Obligations. The responsible manager will conduct all reviews of this TMD and report to our board within two weeks of conducting a review as to:

- Whether any trigger events have occurred.
- What factors may have caused these trigger events to occur, including external factors not related to the design and distribution of our product.
- Whether any changes to our product, distribution channels, or distribution conditions are necessary to ensure that we continue to meet our Design and Distribution Obligations.