

Our Privacy Commitment

This Privacy Policy sets out how we at Australian Private Networks Pty Ltd (APN), ABN 27 103 009 552, manages your personal and other information.

APN fully complies with the **Australian Privacy Principles (APPs)** when managing your information. We recognise the importance of maintaining the confidentiality of our customers' personal information. This Policy is directed primarily at protection of our customers' information, but also deals with personal information of people other than our customers, such as service providers, job applicants, visitors to our premises, technicians and staff of organisations we deal with.

What is classified as personal information?

Personal information includes (but is not limited to):

- Name
- Date of Birth
- Addresses or places of residence
- Contact information i.e. phone numbers and email addresses
- Bank account and credit card information
- Passwords
- Data about your communications services, products and usage
- Product and services provided to you by us and our related entities
- Website usage
- Billing, credit and payment details

How do we collect your information?

APN collects your information through various methods including (but not limited to):

- Information provided by you when completing application forms for our products and services
- Information you enter on our website
- When you use any products and services provided by us or a related entity
- Obtaining information about you from third parties such as a related entity, or the service and technology providers and consultants who support our services
- Information provided directly by you via phone, email, face to face and other forms of correspondence
- Existing records we have about you, for example where information about you as a customer for one product is used to provide another product
- Publicly available sources of information (e.g. phone directories)
- Direct Marketing companies, credit reporting agencies and billing and payment agencies

If you provide information to us or our partners about any other individual, for example a nominated user or representative on your account, by doing so you affirm that you have their consent for their personal information to be used in accordance with this Policy.

If you choose not to provide required information about yourself, we may be unable to provide you with your product or service of choice.

How do we use your personal information?

APN will only use personal information as required for us to provide you with the products and services that we offer and manage our business.

We may use your information for a range of different purposes, including:

- When providing and managing the products/services you request
- To prepare offers, quotes or product materials for you
- To conduct credit-worthiness checks through credit reporting agencies
- To prepare internal reports and analysis about our marketing, customers and products
- As detailed in the section *Credit Reporting* below
- For possible fraud investigations
- For cross marketing by informing you of other services available to you within the range of products offered by APN and our related entities and business partners
- For the distribution of newsletters/flyers
- To provide upgrades/maintenance to our products/services
- For the purpose of financing products supplied by APN and our related entities

Where information disclosure is required to fulfill our business commitments to you, we may disclose your information to persons involved in administering the service, related entities or business partners, for any of the purposes above. We may also disclose information to government and regulatory authorities and other organisations, as required or authorised by law. Where practical, before using or disclosing personal information, we aim to anonymise, aggregate or mask the details that identify individuals where they are not necessary for that use or disclosure.

Sensitive information is only disclosed as authorised or required by the APPs. Certain information relating to telecommunications services may be disclosed as required under the Telecommunications Act 1997 (Cth).

We may also use your information so that we, our related entities and other business partners can promote and market products, services and special offers that we think will be of interest to you (which may include products, services and offers provided by a third party). This marketing may be carried out in a variety of ways (including by email, SMS/MMS, or social media or by customising on-line content and displaying advertising on websites) and may continue after you cease acquiring any products or services from us until you opt out. You may opt out by contacting us as detailed in *How to contact us* below.

How do we keep your personal information secure?

We take the security of your information seriously and have put in place a robust data security system to ensure your information is not accessed by unauthorised parties. We may store your information in hard copy or electronic format, and keep it in facilities that we own and operate

ourselves, or that are owned and operated by our service providers. We have strict physical and electronic security measures and staff policies in place to safeguard access to our premises, documents and computer and network systems. Staff are trained to respect privacy and confidentiality of customer information.

In some cases, the organisations that we disclose your information to, including credit information, may be based outside Australia. For example, we disclose your information to our service providers in the Philippines. Some of the business operations providers and IT platforms we use to support our services are Cloud-based, and those providers may host, manage, cache or transmit information through servers located in Australia and overseas.

We use a number of security measures to protect your personal information such as:

- Account IDs, passwords and personal information about you that can be used to confirm your identity when you contact us or log into our systems
- Firewalls and tools that protect against unauthorised access to your data and our network
- Encryption while transferring data
- Secure servers, networks and systems
- Virus scanning tools
- Security monitoring and reviews to ensure we're protected at all times
- Endeavouring to ensure that third party recipients of information have in place similar measures and commitments to us

You can also help us keep your personal information secure by ensuring that any passwords that you use on our web sites are kept strictly confidential, and by always logging off if you are using a shared computer. Please notify us immediately if there is any unauthorised use of your account.

Re-marketing tracking cookies

APN uses third-party vendor re-marketing tracking cookies, including the Google AdWords tracking cookie. This means we will continue to show ads to you across the internet, specifically on the Google Content Network (GCN) and Google Display Network (GDN). As always, we respect your privacy and are not collecting any identifiable information through the use of Google's or any other third-party remarketing system.

The third-party vendors, including Google, whose services we use – will place cookies on web browsers in order to serve ads based on past visits to our website. Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

Credit Reporting

We collect, hold and use information related to your commercial and consumer creditworthiness from Illion (internet: www.illion.com.au , telephone: 13 23 33), a credit reporting body, for all purposes permitted by law. We also disclose information to them. This activity is conducted for the purpose of assessing your credit capacity, eligibility or history in connection with an application or an obligation as a guarantor, collecting payments from you, and managing our credit relationship.

Creditworthiness information includes information that is both positive (like payment information) and negative (like defaults or serious credit infringements that we may disclose to credit reporting bodies if you fail to pay us).

Keeping information we hold about you up to date

APN takes all reasonable steps to ensure the information we hold about you is accurate and up-to-date. In order for us to maintain up-to-date information, please assist us by notifying us if your details need updating (e.g. you have a new address or have changed your name). APN shall, if requested by the individual, take all reasonable steps to update and correct all personal information held in our customer records. Please contact us if you wish to correct or update our records.

We endeavour to ensure that any irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. However, some personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

How to contact us

If you would like to contact us about a Privacy issue, for example:

- you have any questions in relation to this statement or our management of your information,
- you would like to know what personal information we hold about you
- you would like to correct any information we hold about you
- you would like to stop receiving marketing material from us
- you would like us to send you a copy of our APP Privacy Policy
- you want to make a complaint relating to a Privacy issue

Then please contact us as follows:

Australian Private Networks
279 Dundas Street
Preston, VIC, 3072

Phone: 13 22 88

Email: PrivacyOfficer@apn.net.au

We will respond as quickly as possible, generally within three business days.

How to make a complaint regarding our compliance with the Privacy Act

If you think that we have not complied with the Privacy Act you can make a complaint by using the contact details as above.

We will acknowledge your complaint in writing as soon as practicable within seven days. If we need more time to investigate and resolve your complaint, we will notify you about the reasons for the delay and ask for your agreement to extend this period.

While we aim to resolve all complaints without needing to involve third parties, if you are not satisfied with the outcome of your complaint you can make a complaint to the Australian Information Commissioner at:

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Post: GPO Box 5218, Sydney NSW 2001