

PRIVACY POLICY AND COLLECTION STATEMENT

1. Our commitment to your privacy

WINconnect Pty Ltd (ACN 112 175 710) (**WINconnect**) and each of its related bodies corporate (together "**we**" or "**us**") understand the importance of protecting the privacy of an individual's personal information. This privacy policy sets out how we manage your personal information. It describes the type of personal information we collect, hold, use and disclose and why we do so, how to access and correct the information and how to make a privacy complaint.

In handling your personal information, we will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles in the Privacy Act.

2. What personal information do we collect?

Personal information is information or an opinion, whether it is true or not, about an individual whose identity is apparent, or can be reasonably ascertained, from that information or opinion. During the provision of our products and services, we may collect your personal information.

The types of personal information that we collect may include information about:

- Customers or prospective customers; and
- Other people who come into contact with us in the ordinary course of business.

Generally, the kinds of personal information we may collect are:

- Your name and date of birth;
- Your contact information including address, email and telephone number;
- Your driver's licence or passport details;
- Payment or billing information (including bank account details, credit card details, billing address and invoice details);
- Metering data;
- Life support details, if life support is used at your premises; and
- Details of other authorised contacts who may interact on your account.

We may also hold other personal information provided by you.

3. How do we collect your information?

Where reasonably practicable, we will collect your personal information directly from you. This may be in exchanges and discussions with you, whether in person or via telephone, email, fax or post. This may also be online, through our website, including the completion of online forms.

We may also collect your personal information from third parties including additional account holders on your account, your authorised representative, agents or third parties whom we have business relationships, other energy retailers (if you move to us from that retailer), your energy distributor, credit reporting bodies and credit providers.

We, or a third party engaged by us, may collect “de-identified information” through your use of our website, including the dates and times you access our website, the domains from which you visit our website, your activity on our website and Internet Protocol addresses. This information is referred to as “click stream data” and we may use this data to analyse trends and statistics in order to improve our website and services. We collect this data using various technologies, including “cookies”. A “cookie” is a text file that our website sends to your browser which is then stored on your computer as an anonymous tag identifying your computer (but not you) to us. You can set your browser to disable cookies. However, some parts of our website may not function properly or at all if cookies are disabled.

Some pages on our website and emails created by our website may also contain a “web beacon”. A web beacon is a clear-pixel image which enables us to monitor your Internet activity. When you view a page containing a web beacon, a de-identified notice of your visit is generated which we may process. A web beacon generally works in conjunction with a cookie. If a person disables cookies, a web beacon will be able to generate an anonymous notice of the visit but which cannot be associated with the information contained in a cookie.

4. Why do we need your personal information?

We may collect your personal information for a range of different purposes including:

- to provide our products and services to you;
- to verify your identity;
- for accounting, billing, reporting and other administrative purposes;
- to deal with your applications, enquiries and concerns;
- identifying and informing you of services that might be of interest to you;
- managing the uninterrupted supply of our products or services to you; or
- to comply with legal or regulatory requirements.

5. Who do we disclose your personal information to?

We may disclose your personal information to third parties in the conduct of our business. Third parties may include:

- additional account holders or your authorised representative;
- other energy retailers (if you decide to move to another retailer);
- companies that manage the distribution of your energy;
- service providers who have been contracted to provide installation and maintenance, meter reading, administrative, financial, legal, business consulting, credit management, debt collection, website technology or other services;
- your Embedded Network Owner to provide them with account information such as metering data and billed amounts;
- financial institutions for processing payments;
- government and regulatory authorities (where required or authorised by law); or
- companies to whom we assign your debt.

6. Our credit provider policy

Where we provide products or services to you on credit (that is, you will pay for those products or services after we start providing them to you), we are a credit provider under the Privacy Act. Our credit provider policy can be found [here](#).

7. Overseas disclosure

From time to time, we may disclose your personal information to overseas recipients in order to provide necessary services and for administrative or other business purposes. Before disclosing any personal information to an overseas recipient, we will take reasonable steps in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

8. Direct marketing

We may, from time to time, use your personal information, including your name, telephone number, address and email address in order to inform you of products or services that may be of interest to you. You may opt-out of receiving direct marketing communications from us at any time by contacting us at the details set out below at item 12 or through the opt out mechanism contained in the marketing communication to you.

9. Security of your personal information

We take reasonable steps to ensure that personal information we hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

Some of the ways we do this include:

- storage of electronic information on a server based in Australia restricted to use by authorised personnel using password access; and
- storage of hardcopy information on secure premises only accessible by authorised staff.

10. Accessing your personal information

You can ask us to access the personal information we hold about you. We will, upon your request, and subject to any exemptions under law, provide you with access to the personal information. We will need to first identify you and know the type of information you require access to. We will endeavour to deal with access requests within 30 days. We may charge for our reasonable costs incurred in giving access to the information. If we deny access to any part of the personal information that is requested, we will notify you of our reasons in writing and how you can complain.

11. Updating and correcting your personal information

You can ask us to correct or update the personal information we hold about you at any time. We will need to verify your identity before making any corrections or changes to this information. If you wish to correct or update your personal information, please contact us at the details set out at item 12 below. If we cannot accommodate your request, we will notify you in writing of our reasons and explain how you can complain.

12. How to contact us or complain about our handling of your personal information

For all queries, requests and information about our Privacy Policy or our management of personal information, please contact our Privacy Officer on the following details:

Address:

WINconnect Pty Limited
PO Box 217
Hawthorn VIC 3122

Telephone: 1300 791 970

Email: enquiries@winconnect.com.au

Complaints to WINconnect

If you wish to make a complaint about our handling of your personal information, please contact us on the details set out above. We will investigate your complaint and endeavour to provide you with a response within 30 days of receipt of your complaint. If we cannot respond in the timeframe specified, we will contact you and explain the reason for the delay and give you a new timeframe for our response. If you are not satisfied with our response, then you may lodge a formal complaint with the Office of the Australian Information Commissioner (www.oaic.gov.au).

13. Updates to our Privacy Policy

We may amend or replace our privacy policy from time to time. Any changes to this Privacy Policy will be published on our website.