

## PRIVACY AND CREDIT REPORTING POLICY

### THIS POLICY

Pentanet is committed to protecting your personal information in accordance with the Privacy Act 1988 (the "Privacy Act"). We also operate within the rules outlined in the Telecommunications Act 1997 and the Telecommunications (Interception and Access) Act 1979.

This policy applies to people who use, may use, or are applying to use our services and explains how we collect, use, share and hold your personal and credit related information.

This policy came into effect on October 23<sup>rd</sup>, 2020.

### TYPES OF INFORMATION WE COLLECT

We collect and hold data on prospective, current and past customers. Some of the information we collect includes:

IDENTIFICATION & OCCUPANCY	FINANCIAL & CREDIT	MARKETING & COMMUNICATIONS	DEVICE & TECHNICAL	PRODUCT & SERVICE USAGE
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Address</li> <li>• Date of birth</li> <li>• Email address</li> <li>• Telephone Numbers</li> <li>• Driver's Licence details</li> <li>• Passport details</li> <li>• Photo Card details</li> <li>• Username</li> <li>• Tenancy agreement</li> <li>• Mortgage records</li> <li>• Utility bills</li> <li>• Marriage certificate</li> <li>• Death certificate</li> <li>• Change of name certificate</li> </ul>	<ul style="list-style-type: none"> <li>• Credit/debit card details</li> <li>• Bank account details</li> <li>• Income source</li> <li>• Living arrangements</li> <li>• Payment history</li> <li>• Credit history, including previous credit checks</li> <li>• Service history</li> <li>• Employment history</li> <li>• Credit scores</li> <li>• Information about overdue payments, default listings and serious credit infringements</li> <li>• Bankruptcy and credit-related court judgements</li> </ul>	<ul style="list-style-type: none"> <li>• Demographic information such as gender, location, marital status, household size and education level.</li> <li>• Number and type of devices in your household</li> <li>• How you heard about us</li> <li>• Responses to offers made and/or promotions run by us or our affiliates</li> </ul>	<ul style="list-style-type: none"> <li>• Hardware model</li> <li>• Serial numbers</li> <li>• Settings</li> <li>• Browser version</li> <li>• Device and service identifiers</li> <li>• Operating system version</li> <li>• IP address</li> </ul>	<ul style="list-style-type: none"> <li>• How you use our products, services and networks</li> <li>• Data usage</li> <li>• The services and applications you use on our networks</li> <li>• Information about websites visited</li> <li>• Speed test results</li> </ul> <p>When visiting our websites:</p> <ul style="list-style-type: none"> <li>• Mouse movements</li> <li>• Clicks</li> <li>• Scrolling</li> <li>• Typing (excluding sensitive information such as password and payment information)</li> </ul>

These lists are not all-inclusive. Sometimes we may need to collect additional information as part of a user authentication process, for example when you speak to one of our customer service representatives who needs to access your account.

We also collect information about other individuals, such as your authorised representative. Before providing us with their information, it's important for you to obtain their consent to us collecting and holding their personal information.

### HOW WE COLLECT PERSONAL INFORMATION

There are a few ways that we collect personal information.

You provide information to us such as:

- by phone, email, live chat, social media; or
- when you enter your personal details on our website, including live chat, application or request forms and competition entry forms.

We collect information from your device when you use our products and services, such as when visiting our websites. We may use cookies (small text files that are stored by your web browser), or other similar technology for these purposes. Some examples of cookies that we use or collect are:

- Web Analytics Cookies to understand anonymous and aggregated website behaviour such as how many visitors are using our websites, length of visit, where visitors are navigating, and what pages have been visited.
- Online Advertising Cookies to ensure our online advertising is more relevant to you and keep you from repeatedly seeing the same advertising from us.

The data collected from cookies is anonymous and is not matched to any identified individual. You can usually remove or block cookies and opt-out of interest-based tracking by using the settings in your web browser application or mobile device, however it may affect your ability to use and fully experience our website.

We may also collect information about you indirectly, including from:

- our employees, agents, contractors, re-sellers, or suppliers;
- third parties such as credit reporting bodies and credit providers;
- third parties such as sporting clubs, community organisations;
- business and commercial partners;
- your authorised representative(s);
- other telecommunication and information service providers;
- our equipment; and
- publicly available sources of information such as social media platforms.

In some situations, you may be able to deal with us anonymously or using a pseudonym such as when making a general query via telephone or live chat. However, please keep in mind that it is not possible to acquire services under a pseudonym.

## HOW WE USE PERSONAL INFORMATION

We use your personal information for a variety of purposes including enabling us to:

- verify your identity;
- assess whether you are eligible for our services;
- carry out checks for credit worthiness and for fraud;
- process your service application to become a Pentanet customer;
- establish that you have the rights to occupy the property we are providing a service to;
- provide the products and services you require;
- assist with enquiries and provide customer support;
- manage your services, including billing, account management and collecting debts;
- identify breaches of our terms and conditions of services;
- assist with complaints and rectify faults;
- research and develop our products and services;
- improve business processes;
- communicate with you directly via email, phone, sms and by other means of communication;
- provide you with information about our services, products and special offers (and marketing those products to you unless you have requested us not to do so).

## HOW WE MAY SHARE PERSONAL INFORMATION

Sometimes, we may need to share your personal information to organisations outside Pentanet, for example, with:

- suppliers and contractors so we can supply the service to you;
- technicians we engage to resolve faults concerning your service;
- a credit reporting body or credit provider;
- a fraud-checking agency to carry out checks;
- debt collection agencies and similar parties that assist with debt-recovery;
- printers, mail distributors and couriers;
- specialist contractors for the purposes of research and development;
- other communication companies;
- our professional advisers, including our accountants, auditors and lawyers;
- other telecommunications and information service providers;
- your authorised representative in the manner you have agreed to;
- your legal advisers, if requested by you to do so;
- a duly authorised government, regulatory authority or other organisation such as the TIO, when we are required or specifically permitted by law to do so, or to resolve customer complaints or disputes;
- a specified recipient if a court order compels us to do so; and
- law enforcement agencies concerning the enforcement of criminal and other laws if we are compelled or required to do so.

## HOW WE HOLD PERSONAL INFORMATION

We implement a variety of security measures to protect the information we hold, some of these include:

- Verifying ID before personal information is disclosed to any person, including yourself;
- Storing information on controlled systems, secured against unauthorised access;
- Limiting access so that only users that require access to personal information to perform their duties can access it;
- Retaining logs of the access and modification of information;
- Encryption of data in storage and during transit; and

- Staff training with the requirement to sign acknowledgements of their obligations in relation to confidentiality and appropriate use of our IT systems.

If requested, we can provide further protection by adding a unique password or pin to your account, which we'll ask for when confirming your identity. This is free of charge and can be added or removed at any time. Contact us if you would like more information or assistance regarding this option.

## CREDIT REPORTING

When you apply for our services, we might collect credit information about you from a credit reporting body, this may include information the credit reporting body has obtained from other credit providers. We might also share the information you provided in your application. In future, the credit reporting body may disclose this information to other credit providers to assist them in assessing your credit worthiness.

We use or disclose credit related information for purposes such as assessing your credit worthiness, managing credit we provide, assisting you in avoiding financial over-commitment and to further develop our credit assessment system.

If you have been or are likely to be a victim of fraud you can request credit reporting bodies not to use or disclose the information they hold.

You can find more information about Equifax, the credit reporting body we work with, by:

Telephone: 13 83 32

Address: Equifax Pty Ltd

GPO Box 964

North Sydney NSW 2059

Website: <https://www.mycreditfile.com.au/>

## HOW TO ACCESS & UPDATE PERSONAL INFORMATION

If your contact details have changed, it's important to let us know. Otherwise, we may not be able to contact you with important information relating to your Pentanet service. You can update your contact details by logging into the Customer Portal, or by contacting us.

If you wish, you can also request a copy of the information we have on file for you. We'll need to verify your identity first and will also ask if there's any particular information you're after.

There is no charge for requesting a copy of the information we have on file for you. However, if fulfilling your request is particularly resource-intensive, an administrative fee may apply. We'll let you know how much this will be and what it covers before proceeding.

If you do not wish to be contacted by SMS or email with marketing material about our events or products and services, you can opt out by using the unsubscribe option. To opt out of emails or calls from our sales representatives, please advise our team by return email or by calling 08 9466 2670.

## HOW TO MAKE A PRIVACY COMPLAINT

If you have any privacy queries or wish to make a complaint, you can contact our team by:

- Live chat on our website
- Email to [support@pentanet.com.au](mailto:support@pentanet.com.au)
- Raising a ticket through our Customer Portal at <https://my.pentanet.com.au/login/>
- Calling 08 9466 2670 (Hours of operation are 8:30am to 5:30pm, Monday to Friday)

We will acknowledge your complaint, provide you with a unique reference number you can use to follow up, and give you an approximate time frame for a resolution. Although our goal is to resolve your complaint during your first contact with us, unfortunately this is not always possible as we may need to investigate the matter further. After investigation of your complaint is complete, we'll be in touch with a resolution as soon as practicable.

Complaints are handled in accordance with our complaints handling process. For more information on the process, visit <https://www.pentanet.com.au/additional-resources/>.

If you are dissatisfied with the outcome of your complaint, you may wish to seek external dispute resolution by lodging a complaint with the Telecommunications Industry Ombudsman or the Office of the Australian Information Commissioner.