

## EXPRESS TELECOMMUNICATIONS PRIVACY POLICY

### 1. Introduction

This statement is our privacy policy which sets out how we manage your personal information and other information. Before we go into the detail, we need to define a few terms. This bit can get a bit technical, so please bear with us:

**Your information:** When we refer to your information, we are referring to both your personal information, as defined under the Privacy Act 1988 (Cth), and customer information, which is protected by Part 13 of the Telecommunications Act 1997 (Cth).

**Credit Reporting Policy:** This sets out how we manage your credit information and credit eligibility information where this is relevant to you, and is our credit reporting policy for the purposes of Part IIIA of the Privacy Act.

### 2. The kinds of information we collect and hold

Depending on the particular circumstances, we may collect and hold a range of different information about you. This can include your name, date of birth, contact details (including address, email address, phone number or mobile telephone number), occupation, driver's licence number, username or password, financial information (such as credit card or bank account numbers) and information about how you use our products and services.

This is not an exhaustive list. For example, we may sometimes need to collect additional information as part of a user authentication process, such as when you want to speak to one of our customer service personnel who need to access your account. We may also need to collect additional information from you, such as limited health information to provide priority assistance services or a Centrelink customer reference number to provide you with a pensioner discount.

You might also need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them about this statement.

### 3. How we collect your information

We may collect your information in a number of ways, including:

- directly from you (such as where you provide information to via one of our authorised franchises, websites, complete an application form or agreement for one of our services, or contact us with a query or request)
- from third parties such as our related entities, business partners, credit reporting bodies (for more details see our Credit Reporting Policy below), wholesale or other customers, or your representatives
- from publicly available sources of information
- from our records of how you use your Express Telecommunication products or services.
- when legally authorised or required to do so, for example, when we need to undertake identity checks for pre-paid public mobile telecommunications services under the Telecommunications (Service Provider — Identity Checks for Prepaid Mobile Carriage Services) Determination 2013
- from the third parties we list in the section of this Statement with the heading When we disclose your information.

If you choose not to provide certain information about you, we may not be able to provide you with the products or services you require, or the level of service on which we pride ourselves.

We may also collect information from you online. For more information, please go to the online privacy section of our website.

We collect, hold and use, information related to your commercial and consumer creditworthiness from Dun & Bradstreet (w: www.dnb.com.au | e: pac.austral@dnb.com.au | t: 1300 734 806), 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). Our privacy policy and the credit reporting body's privacy policy (see our websites) have more information on how we, and the credit reporting body, manage personal information, including creditworthiness information. The policies also include how you can access, correct, and make complaints about personal information, request that your information is not used for credit pre-screening, and request a ban on use of credit information where you have been a victim of fraud.

#### 4. How we hold your information

We may store your information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We take reasonable steps to maintain the security of your information and to protect it from unauthorised disclosures.

While we take these steps to maintain the security of your information, you should be aware of the many information security risks that exist today and take appropriate care to help safeguard your information. We encourage you to read some of our helpful tips and hints on how to protect your information through online safety, available on our website.

#### 5. How we use your information

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

- to verify your identity, or to conduct appropriate checks for credit-worthiness and for fraud checking
- to provide products and services to you, to provide you with information about those products and services, to assist you with enquiries or purchases, to enhance your experience on our network, or to provide you with better customer service
- to administer and manage the products and services we provide to you, to charge and bill you for them, and to collect any amounts you may owe us
- to gain an understanding of your information and communication needs, to perform research and analysis, and to improve or develop our products and services
- to monitor network use, quality and performance, and to operate, maintain, develop, test and upgrade our systems and infrastructure
- conduct appropriate checks for credit-worthiness and for fraud
- as authorised or required by the Telecommunications Act 1997 (Cth) and other laws applicable to us.

We may also use your information so that we, our related entities, dealers 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 by calling 1800 039 059.

## 6. When we disclose your information

We may disclose your information to third parties who provide services to us, including organisations and contractors that assist us with the purposes for which we use your information. These services include:

- customer enquiries
- installation, maintenance and repair services
- mailing operations, billing and debt-recovery functions
- information technology and network services
- market research, marketing, telemarketing and door-knocking services

### We may also disclose your information:

- to your authorised representatives or advisers, or when you ask us to do so
- to credit-reporting bodies (for more details see our Credit Reporting Policy below) and fraud-checking agencies, and to credit providers for credit related purposes such as credit-worthiness, credit rating, credit provision and financing
- our dealers, our related entities or our business partners
- to other telecommunication and information service providers or to our wholesale and other customers from or through whom you may acquire products or services (for example, we may need to disclose your information for billing purposes)
- to the manager of the Integrated Public Number Database, and other organisations as required or authorised by law
- to law enforcement and national security agencies, and other government and regulatory authorities as required or authorised by law
- to third parties who assist us to manage or develop our business and corporate strategies and functions, including our corporate risk or funding functions
- for the purposes of facilitating or implementing a transfer/sale of all or part of our assets or business.

In some cases, the organisations to who we may disclose your information may be based outside Australia.

## 7. How to access or correct your personal information or make a privacy complaint

If you wish to access any of your personal information that we hold or would like to correct any errors in that information, please contact us using the contact details set out in the how to contact us section of this Statement, so that we can consider and respond to your request. We may apply an administrative charge for providing access to your personal information in response to a request.

You may also use these contact details to notify us of any privacy complaint you have against us, including if you think that we have failed to comply with the Australian Privacy Principles (APP) or any binding APP code that has been registered under the Privacy Act. We are committed to acknowledging your complaint in a prompt manner and will give you an estimated timeframe for when we will respond to your complaint.

While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, you may also be able to lodge a complaint with a relevant regulator such as the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) or the Telecommunications Industry Ombudsman ([www.tio.com.au](http://www.tio.com.au)).

This Statement has been issued by Express Business Group Pty Ltd, effective as at 07 October 2014. From time to time, we may need to change this Statement. If we do so, we will post the updated version on our website ([www.expresstelecommunications.com.au](http://www.expresstelecommunications.com.au)) and it will apply to all of your information held by us at the time.

## 9. How to contact us

If you have any questions in relation to this Statement or our management of your information, please let us know by contacting us on 1300 397 737 or writing to us at [info@expresstelecommunications.com.au](mailto:info@expresstelecommunications.com.au).

## 10. Credit Reporting Policy

We may provide credit as contemplated in the Privacy Act to our customers in connection with our products and services (for example, post-paid accounts) and, as a result, we may collect credit information and credit eligibility information about you as referred to in the Privacy Act. Our Credit Reporting Policy sets out how we manage that information. This credit reporting policy relates to Express Telecommunications and to our related entities that are deemed to be credit providers or affected information recipients for the purposes of the Privacy Act 1988 (Cth).

How we collect and hold credit information and credit eligibility information about you

Credit information relates primarily to your credit related dealings with us and covers various types of information that can be collected by Credit Reporting Bodies (CRBs) that report on consumer credit worthiness.

Credit information includes:

- identification information
- basic information about your credit account (for example when it was opened)
- details about information requests we make about you to CRBs
- information about certain overdue payments and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these
- various publicly available information like bankruptcy and credit-related court judgements.

We may collect credit information about you in any of the circumstances relating to other personal information described in our Privacy Statement under How we collect your information. Credit eligibility information is information equivalent to the kinds listed above that we generally collect from CRBs.

This information relates primarily to your dealings with other credit providers (for example, banks, other financial institutions, or other organisations that may provide you with credit in connection with their products or services). It may also include certain credit worthiness information that we derive from the data that we receive from a CRB. Sometimes we may also collect credit eligibility information about you from other credit providers.

We store and safeguard your credit information and credit eligibility information in the ways described in our Privacy Statement under How we hold your information.

How we use and when we disclose your credit information and credit eligibility information

We may disclose your credit information to CRBs. Those CRBs may then include that information in credit reporting information that they provide to other credit providers to assist them to assess your credit worthiness.

We may also use and disclose your credit information for other purposes and in other circumstances as described in our Privacy Statement under How we use your information and When we disclose your information, when permitted to do so by the Privacy Act.

Our use and disclosure of credit eligibility information is regulated by Part IIIA of the Privacy Act and the Credit Reporting Privacy Code. We will only use or disclose such information for purposes permitted by these laws, such as:

- processing credit-related applications and managing credit that we provide
- assisting you to avoid defaults
- collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements
- assigning our debts
- participating in the credit reporting system
- dealing with complaints or regulatory matters relating to credit or credit reporting
- as required or authorised by another law.

In some cases, the people to whom we may disclose your credit information or credit eligibility information may be based outside Australia – for more information please see the details in our Privacy Statement under When we disclose your information.

## **11. How to access or correct your credit information or credit eligibility information**

If you wish to access or correct errors in any of your credit information or credit eligibility information that we hold, please contact us using the contact details in the How to contact us section in our Privacy Statement.

We may apply an administrative charge for providing access to your credit eligibility information, depending on the request.

## **12. How to make a complaint regarding our compliance with Part IIIA of the Privacy Act and the Credit Reporting Privacy Code**

If you think that we have not complied with Part IIIA of the Privacy Act or with the Credit Reporting Privacy Code (which regulates credit reporting) you can make a complaint by using the contact details in the How to contact us section of our Privacy Statement.

We will acknowledge your complaint in writing as soon as practicable within 7 days. We will aim to investigate and resolve your complaint within 30 days of receiving it. If we need more time, we will notify you about the reasons for the delay and ask for your agreement to extend this 30 day period (if you do not agree, we may not be able to resolve your complaint).

We may need to consult with a CRB or another credit provider to investigate your complaint. While we hope that we will be able to resolve any complaint without needing to involve third parties, if you are not satisfied with the outcome of your complaint you can access our external dispute resolution scheme, the Telecommunications Industry Ombudsman ([www.tio.com.au](http://www.tio.com.au)), or make a complaint to the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).