

1. Privacy Policy

Encoo Pty Ltd is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. This policy also incorporates our Credit Reporting Policy, which explains how we use any credit information that we collect.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>. We may need to update our Privacy Policy from time to time, a current version can be obtained on our website at <https://www.encoo.com.au/legal-documents>.

1.1 What is Personal Information?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes names, addresses, email addresses, phone and facsimile numbers.

1.2 How and why do we collect Personal Information?

This Personal Information is obtained in many ways including your applications to us and interactions with us or our business partners, interviews, correspondence, by telephone and facsimile, by email, via our website www.encoo.com.au, from your website, from social media platforms and publications, from other publicly available sources and from third parties such as credit reporting bodies and other service providers. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may collect information to verify your identity and to prevent fraud, to provide you services, to communicate with you about services and to bill you. We may collect employment, financial and credit information. We may collect information about how you use our services and technical information about devices you use.

We may collect Personal Information about other people from you, such as your authorised representative. If so, we rely on you informing this person that you are providing their Personal Information to us and to tell them about our Privacy Policy.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. This may include direct marketing about our services. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

We are required and authorised by law to collect and use Personal Information in certain circumstances, including our obligation to retain communications data that may be accessed by government agencies, to provide data for the White Pages directory and emergency call services and to prevent threats to life or health.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

1.3 Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

1.4 Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

1.5 Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

We may need to share your personal information with third parties that we have contracted to assist in supply or improvement of services, such as to install, maintain and manage your service, to fix a technical fault, to provide or track your hardware delivery, billing, credit assessment, debt recovery, or for a customer or market research project. Other than these instances, we do not give information about you to anyone else unless:

- you have consented.
- you would expect us to or we have told you we will.
- it is required or authorised by law.
- it will prevent or lessen a serious and imminent threat to somebody's life or health.
- the disclosure is reasonably necessary for law enforcement or for the protection of public safety.
- the disclosure is to parties that assist us with fraud and identity checking.
- parties, investors, and advisors involved in the sale of our business, financing or debt sales.
- other telecommunications and information service providers.

1.5 Credit Reporting

We may collect information about you from and disclose your personal information to credit reporting bodies in connection with your application for products or services, or other dealings with us. Our credit reporting bodies include Equifax Australia Group Pty Ltd, which can be contacted at 138332 or www.mycreditfile.com.au.

Those credit reporting bodies may then include that information in reports that they provide to other credit providers to assist in assessing your credit worthiness.

For example, if you fail to meet your payment obligations to us, or if you commit a serious credit infringement in relation to credit for our products or services, we may be entitled to disclose this information to credit

reporting bodies. We may collect information about your credit worthiness or to establish your eligibility for consumer credit from a credit reporting body. We hold credit and credit eligibility information in the same manner that we hold personal information. The credit and credit eligibility information collected, held or disclosed can include:

- information about your identity.
- information requests to credit reporting bodies.
- credit applications and arrangements.
- details about default listings, overdue payments or serious credit infringements and subsequent payments or arrangements.
- bankruptcy or credit related court proceedings and other publicly available information.
- credit scores, risk assessments and credit worthiness.

We may use or disclose information about your credit to:

- process applications and manage credit.
- develop our credit rating systems.
- assist you to avoid default and to assess or manage a financial hardship application.
- collect debts from you.
- deal with serious credit infringements.
- deal with complaints.
- deal with regulatory matters and when required or authorised by law.
- assign debts.
- adhere to our credit reporting obligations.

You have the right to ask credit reporting bodies not use your credit eligibility information to determine whether credit providers such as us can send you direct marketing material or use or disclose your credit eligibility information if you have been or are likely to be a victim of fraudulent activity.

1.6 Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. It may be stored electronically or in hardcopy and kept in storage facilities that we or a third party service provider owns.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, we may need to keep some of your Personal Information for a longer period of time to comply with legal and regulatory obligations or to meet our legitimate business interests.

1.7 Access to your Personal Information

When we collect personal information directly from you, we follow industry standards to protect information submitted to us both while in transit and once we receive it. It is stored in our controlled customer management system, and our staff who are able to access this system receive training in privacy requirements.

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing. Encoo Pty Ltd will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information. In order to protect your Personal Information, we may require identification from you before releasing the requested information.

1.8 Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date.

We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

1.9 Policy Updates

This Policy may change from time to time and is available on our website.

1.10 Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at:

Suite 2 / Level 9, 350 Collins Street Melbourne Vic 3000
E: management@encoo.com.au
P: 1300 142 350

If after our response to your complaint you consider it remains unresolved, you can lodge a privacy complaint with the Office of the Australian Information Commissioner (www.oaic.gov.au) or the Telecommunications Industry Ombudsman (www.tio.com.au).