

PRIVACY STATEMENT

Aatrox Communications

Introduction

This statement includes:

- > our *collection statement*, explaining aspects of our collection and use of personal information
- > our *privacy policy*, further explaining how we manage personal information
- > our *credit reporting policy*, explaining how we manage we manage credit information and credit eligibility information.

COLLECTION STATEMENT

Who we are

Aatrox Communications ABN 91 622 636 266 ACN 622 636 266

Our contact details

- > Phone: 0383972990
- > Email: accounts@aatroxcommunications.com.au
- > Web site: <https://www.aatroxcommunications.com.au>

Collection from third party sources

We may collect personal information from someone other than you, and you may not be aware of the collection, when it is not reasonable or practicable to collect it from you, and it is available from:

- > publicly available sources like phone books
- > other companies in our group that you may have dealt with
- > third parties like our business partners, your authorised representative/s and wholesalers
- > information brokers
- > other telecommunication and information service providers that interact with us in providing products to you (eg overseas when you use a roaming mobile service)
- > credit reporting bodies, credit providers, fraud checking agencies
- > our dealers, contractors and other representatives that you may deal with
- > our websites and how you use them
- > various parties listed under *Disclosing personal information* in our Privacy Policy.

Collection under law

We may be required to collect personal information under the *Telecommunications Act 1997* and laws made under it (eg if we supply a pre-paid public mobile telecommunications service, we are required by law to carry out an identity check.)

We may be required to collect information, relating to an individual or a communication to which an individual is a party, under the 'data retention' provisions of the *Telecommunications (interception and Access) Act 1979* ('Data Retention Law').

Why we collect and hold personal information

We collect and hold personal information because:

- > we may need to use it to operate our business
- > we may need to provide it to other parties in connection with our business
- > we may need it to comply with the law, including the Data Retention Law.

The uses and disclosures we may make of personal information are detailed in our Privacy Policy.

Unavailability of personal information

If we cannot collect the information we need about you, we may not be able to supply the products or service you want.

Disclosing personal information

We may disclose personal information as reasonably required to contractors and suppliers who goods and services that we use to operate our business and provide products and support to you, and to other parties detailed in our Privacy Policy. We may also disclose it to authorised agencies under the Data Retention Law.

Some of these parties may be based overseas and countries where you use roaming services while travelling.

Access and correction

Our privacy policy contains information about how the you can access and seek correction of the personal information about you that we hold.

Complaints

Our privacy policy explains how you can complain about a breach of the Australian Privacy Principles, and how we will deal with such a complaint.

Credit related information

Our Credit Reporting Policy is on our web site and contains information about:

- > how you may access credit eligibility information we hold about you
- > how you may seek correction of credit information or credit eligibility information we hold about you
- > how you may complain about our failure to comply with the credit reporting rules in the Privacy Act
- > how we will deal with a complaint.

We [are / are not] likely disclose credit information or credit eligibility information to entities that do not have an Australian link (as that term is defined by the Privacy Act).

Web site and credit notifiable matters

If there are any Credit Reporting Bodies (**CRB**) to which we are likely to disclose your credit information, our web site also contains information about credit reporting, including details of each CRB and a statement of 'notifiable matters' that explains:

- > that the CRB may include the information in credit reports;
- > that we may disclose certain credit defaults to the CRB;
- > how to obtain the credit-related information management policies of us and the CRB;
- > your right to access and seek correction of credit-related information about you, and make a complaint;
- > your right to ask the CRB not to use credit reporting information to facilitate direct marketing;
- > your right to ask the CRB not to use or disclose credit reporting information about you where there may have been fraud.

You can ask for the statement of notifiable matters in an alternative form, such as a hard copy.

PRIVACY POLICY

Personal information

This refers to information or an opinion about a living person who is identified or reasonably identifiable, whether or not true and whether or not recorded in material form. For the purposes of the Data Retention Law, it also refers to information retained for the purposes of that law, if it relates to an individual or a communication to which the individual is a party.

Kinds of personal information we collect and hold

Broadly, we may collect and hold:

- > *personal details* like name, date of birth, gender, occupation and driver licence number
- > *contact details* like physical, postal, work and email addresses and phone numbers
- > *financial details* like bank account, credit card numbers and your billing and payment history with us
- > *service-related details* like your user name, encrypted password and service usage history, support incidents, enquiries and complaints
- > *other details* relating to special situations like specific health information if you apply for priority assistance and information about any authorised representative you appoint
- > *Data Retention Law details* (where that law applies) like subscriber and account details, service details, details about telecommunications devices, the source and destination of communications, the date and time of communications and connection to services, the type of a communication or service and location details.

In any case, we only collect personal information that is reasonably necessary to support our functions and activities. If we cannot collect the information we need about you, we may not be able to supply the products or service you want.

Collecting personal

Unless it is not reasonable or practicable to do so, and in other cases

information

allowed by law, we will collect personal information about you directly from you (eg when you contact us by phone or online, or at our premises, or fill in an application form).

In other cases, we may collect personal information about you from:

- > publicly available sources like phone books
- > other companies in our group that you may have dealt with
- > third parties like our business partners, your authorised representative/s and wholesalers
- > information brokers
- > other telecommunication and information service providers that interact with us in providing products to you (eg overseas when you use a roaming mobile service)
- > credit reporting bodies, credit providers, fraud checking agencies
- > our dealers, contractors and other representatives that you may deal with
- > our websites and how you use them
- > various parties listed under *Disclosing personal information* below.

Holding personal information

We hold personal information in hard and/or soft copy at our offices and in other facilities that we own or license from third parties, like data centres. We take reasonable steps to keep it secure and to protect it from unauthorised access, use or alteration. Where required by the Data Retention Law, it will be encrypted.

Why we collect and hold personal information

We collect and hold personal information because:

- > we may need to use it to operate our business
- > we may need to provide it to other parties in connection with our business
- > we may need it to comply with the law, including the Data Retention Law.

Using personal information

We may use personal information:

- > to identify you
- > for credit checks
- > to prevent fraud
- > to supply products (including goods and/or services) to you
- > to give you information about us and our products, and product offers
- > for direct marketing – see *Direct marketing* for details
- > to improve our products, our marketing and our website
- > to answer your enquiries
- > to give you customer support and service
- > to better understand your needs and respond to them
- > to manage and plan our products and business

- > to charge and bill you for products you use
- > to collect payment from you
- > to monitor, manage, test and improve our network and facilities
- > to comply with various laws that apply to us, including the *Telecommunications Act 1997*, the Data Retention Law and our obligations under any carrier licence that we hold
- > for other purposes related to the operation of our business.

Disclosing personal information

We may disclose personal information as reasonably required:

- > to contractors and suppliers who supply or support us in:
 - market research, sales and marketing
 - direct marketing – see *Direct marketing* for details
 - identity and fraud checking
 - credit-related matters like credit rating, creditworthiness and credit provision
 - credit management
 - service provisioning
 - installation, maintenance and repairs
 - helpdesk and enquiries
 - support and complaint management
 - communications and mailing
 - billing, debt recovery and credit management
 - network and product design and maintenance
 - corporate strategy
 - legal and regulatory advice and compliance
 - accounting and financial planning
 - risk management
 - otherwise providing goods and services that we use to operate our business and provide products and support to you
- > to your authorised representative/s
- > if you ask us to do so
- > to our agents, dealers and members of our corporate group
- > to our business partners and wholesale suppliers
- > to other telecommunication and information service providers that interact with us in providing products to you (eg overseas when you use a roaming mobile service)
- > to the manager of the Integrated Public Number Database, the Australian Communications and Media Authority, police, law enforcement and national security agencies and other authorities when and as required by law
- > to authorised agencies under the Data Retention Law
- > to organisations that provide credit or finance to us
- > to persons who invest in or acquire all or part of our business or

company, or are considering doing so.

Some of these parties may be based overseas and countries where you use roaming services while travelling.

Direct marketing

We may use and disclose personal information to direct market to you products offered by us, our agents, dealers and members of our corporate group, and our business partners, where we think the offers will be of interest to you, using:

- > post
- > email
- > electronic messaging
- > social media
- > targeted web content
- > other direct marketing channels.

Direct marketing may continue until you opt-out by calling the number in *Contacting us* even if you are no longer our customer.

Accessing and correcting personal information

Please contact us for these purposes using the details in *Contacting us* below. We shall process and respond to your request in accordance with Australian Privacy Principle 12. There is no charge for making a request but a reasonable administrative charge, on a cost recovery basis, may be payable before we agree to provide access.

Complaints

If you wish to complain about a breach of the Australian Privacy Principles, please contact us using the details in *Contacting us* below. We shall:

- > acknowledge your complaint within a reasonable time
- > give you an estimated first response time
- > allocate your complaint to a suitably senior staff member
- > process and respond to your complaint as soon as we reasonably can.

Contacting us

Questions, requests and complaints regarding our Privacy Statement or our compliance with privacy laws should be directed to us by telephone on [number] or email to [address].

CREDIT REPORTING POLICY

Credit information

This refers to information such as:

- > identification information
- > basic details of a credit account (eg establishment date)
- > details of enquiries we make to Credit Reporting Bodies (CRBs) about you
- > details of some overdue payments and serious credit infringements and of payments or later arrangements in relation

to either of these

- > publicly available information like bankruptcy and court judgments for debts,
- more fully defined in the Privacy Act.

Credit eligibility information

This refers to credit information (together with other credit-related information that CRBs derive from it) we obtain from a CRB together with credit-related information that we derive from it, and is more fully defined in the Privacy Act.

Dealing in credit-related information

If we provide credit, as defined in the Privacy Act, we may collect and deal in credit information, credit reporting information and credit eligibility information (eg if we supply equipment on credit terms or a post-paid product).

Collecting credit information

We may collect credit information in the same way as other personal information. See *Collecting personal information* above for details.

Collecting credit eligibility information

We may collect credit information from CRBs and other credit providers.

Holding credit-related information

We hold and protect credit information and credit eligibility information in the same way as other personal information. See *Holding personal information* above.

Using credit information

We use credit information in the same way as other personal information. See *Using personal information* above.

Using credit eligibility information

We use credit eligibility information in ways permitted by the the Privacy Act and the Credit Reporting Privacy Code, such as:

- > processing credit applications
- > managing credit we provide
- > helping you avoid defaults
- > collecting credit-related debts you owe us
- > dealing with serious credit infringements
- > participating in the credit reporting system
- > transferring our debts to third parties
- > dealing with complaints relating to credit or credit reporting
- > for regulatory compliance purposes
- > in accordance with laws.

Disclosing credit information

We may disclose credit information:

- > in the same way as other personal information. See *Disclosing personal information* above; and
- > to CRBs, which may disclose it to other credit providers.

Disclosing credit eligibility information

We may disclose credit eligibility information for purposes permitted by the the Privacy Act and the Credit Reporting Privacy Code, such as those detailed in *Using credit eligibility information* above.

Some of these disclosures may be to parties based overseas.

Accessing and correcting credit information or credit eligibility information

Please contact us for these purposes using the details in *Contacting us*. There is no charge for making a request but a reasonable administrative charge, on a cost recovery basis, may be payable before we agree to provide access.

Complaints about credit compliance

If you wish to complain about a breach of Part IIIA of the Privacy Act or the Credit Reporting Privacy Code, please contact us using the details in *Contacting us*. We shall:

- > acknowledge your complaint within seven days, and sooner if practicable
- > try to investigate and resolve the matter within 30 days
- > explain any delay if we need more time, and seek your agreement (but if you do not agree, we might be unable to finalise the matter)
- > communicate, if necessary, with any other credit provider or CRB relevant to the matter.

If you are dissatisfied with the result of a complaint, you may escalate it to any external dispute resolution scheme (**EDR**) we are a member of, the Australian Information Commissioner (www.oaic.gov.au) or the Telecommunications Industry Ombudsman (www.tio.com.au).