



AusNet Services Privacy Policy

1 May 2019



AusNet Services Privacy Policy

1 INTRODUCTION

This Privacy Policy:

- (a) subject to paragraph (b), applies to all companies in the AusNet Services group (**AusNet Services, we, us, our**), including AusNet Services Ltd ABN 45 603 317 559, AusNet Services (Distribution) Pty Ltd ABN 37 108 788 245, AusNet Services (Transmission) Pty Ltd ABN 48 116 124 362, AusNet Transmission Group Pty Ltd ABN 78 079 798 173, AusNet Gas Services Pty Ltd ABN 43 086 015 036, AusNet Electricity Services Pty Ltd ABN 91 064 651 118, and AusNet Asset Services Pty Ltd ABN 27 075 826 881;
- (b) does *not* apply to Mondo Power Pty Ltd ABN 73 097 962 395, which is part of the AusNet Services group but has a separate privacy policy (available at www.mondo.com.au);
- (c) explains how AusNet Services collects, holds, uses and discloses personal information and complies with the requirements of the *Privacy Act 1988* (Cth) (**Privacy Act**); and
- (d) applies in respect of all personal information collected by AusNet Services, including the personal information of customers and suppliers, *other than* the personal information of individual employees and contractors (together, **Personnel**) which is covered by a separate personnel information handling policy. Personnel should liaise with their HR contact to obtain a copy of this policy.

We may update this Privacy Policy from time to time. The most current version will be posted on the AusNet Services website (<https://ausnetservices.com.au/en/Misc-Pages/Privacy>) and will be effective from the date of posting.

2 PERSONAL INFORMATION WE COLLECT

The types of personal information we collect about you depends on the circumstances in which that information is collected. The kinds of personal information we collect and hold includes:

- (a) for our **customers**:
 - (i) as the account holder, your name and contact details (e.g. postal address, telephone number and email address);
 - (ii) the site address to which we supply products or services;
 - (iii) billing information and metering data; and
 - (iv) other information relevant to the provision of services by us to your premises;
- (b) for our **suppliers and service providers**, your name and contact details as someone who works for the supplier or service provider we deal with;
- (c) for **prospective Personnel** seeking employment or engagement with AusNet Services, your name and contact information, your curriculum vitae, and other information about your suitability for employment with or engagement by us; and
- (d) for **other individuals** who are not AusNet Services customers:
 - (i) your name and contact telephone number (where you are requesting a service or quote, or reporting a fault, outage or other incident); or
 - (ii) your address, metering data and billing information (where you are requesting a service or quote, or this information is necessary to enable us to meet our contractual obligations to a third party).

3 HOW WE COLLECT PERSONAL INFORMATION

3.1 Personal information generally

AusNet Services collects personal information about you where it is reasonably necessary for us to perform one or more of our functions or activities as a diversified energy business.

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We endeavour to collect your personal information from you. There are however, circumstances in which we collect personal information from a third party, such as an energy retailer. Where we collect personal information from a third party, we will handle that information in accordance with this Privacy Policy.

3.2 Sensitive information

We will only collect sensitive information about you where we have obtained your consent to do so or we are required or authorised by law to do so, such as when we are required to record that someone at your address requires equipment for life support.

In providing any consents to the collection or handling of personal information (including sensitive information), you consent to us collecting, holding, using and disclosing the information you provide in accordance with the terms of those consents and this Privacy Policy.

3.3 If personal information is not provided

If you do not provide us with your personal information when requested, this may limit the assistance we are able to provide to you. For example, we may not be able to provide the product or service you may have requested, or we may not be able to handle enquiries or claims in connection with those products or services, or process your job application. For energy customers, this may also mean your retailer cannot supply you with electricity or gas.

4 HOW WE USE AND DISCLOSE PERSONAL INFORMATION

4.1 Purposes of collection, holding, use and disclosure of personal information generally

Personal information we collect may be held, used and disclosed for the following purposes:

- (a) for the purposes of:
 - (i) operating, maintaining, managing, planning and developing our energy networks;
 - (ii) business planning and product development;
 - (iii) performing statistical and other analysis of usage of our energy networks;
 - (iv) protecting our legal rights, investigating suspected misconduct or assisting law enforcement agencies; and/or
 - (v) enabling us to comply with our legal and regulatory obligations. For example, sometimes, we may be required to collect, use or disclose personal information by national or Victorian laws and regulations, including the National Electricity Law, the National Gas Law, or the rules and regulatory instruments made under those laws;
- (b) if you are our **customer**, for the purposes of:
 - (i) connecting or maintaining your supply of electricity and/or gas, including notifying you about interruptions, faults, outages, emergencies, or other matters relevant to your supply;
 - (ii) validating your request for access to AusNet Services' *myHomeEnergy* portal;
 - (iii) verifying your identity and validating your request for access to your metering data (or a request to authorise a third party to access your metering data);
 - (iv) installing, supplying and maintaining meters, and providing meter reading and testing services;
 - (v) identifying possible technical problems and efficiency issues, and informing you of these matters and potential solutions;
 - (vi) providing such other products or services that we may offer from time to time and providing information about their availability, features and benefits, including products or services which we offer to you in response to a government policy or regulatory initiative;
 - (vii) providing billing and account management services associated with the products or services we provide, and assisting energy retailers to bill you; and/or

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- (viii) responding to your enquiries, or investigating or resolving a complaint you make;
- (c) if you are or you work for a **supplier or service provider**, for the purposes of acquiring goods or services from such suppliers and service providers;
- (d) if you are **prospective Personnel**, for the purposes of recruitment and selection;
- (e) if you are an **individual** who is not an AusNet Services customer, for the purposes of:
 - (i) maintaining a supply of electricity and/or gas;
 - (ii) providing a quote to provide products or services; and/or
 - (iii) fulfilling a contractual obligation we owe to a third party.

We may also use and disclose personal information we collect for other purposes that are permitted, required or authorised by applicable law, such as:

- (a) purposes which you would reasonably expect and which are related (and, in the case of sensitive information, directly related) to the primary purpose of collection of personal information; and/or
- (b) any other purposes for which you have given consent.

4.2 Marketing

We will only use or disclose your personal information for the purposes of direct marketing (e.g. in relation to products, services and benefits we may offer from time to time) where we have your consent or we are otherwise permitted by law to do so.

You are free to opt out from receiving marketing communications from AusNet Services by:

- (a) following the “opt out” process indicated in a marketing communication you have received;
- (b) contacting our Customer Support team using the details at the end of this Privacy Policy; or
- (c) following such other process that is made available for this purpose from time to time.

4.3 Third party access to personal information we collect

In order to perform activities in connection with the purposes described in this Privacy Policy, we may make personal information available to other persons or entities, or disclose it to them, including:

- (a) our suppliers and service providers, including those to whom we outsource certain of our functions (e.g. billing, customer communications or customer surveys). We authorise our suppliers and service providers to use or disclose your personal information only as necessary to provide us with supplies or perform services on our behalf, or to comply with legal requirements. We require suppliers and service providers by contract to safeguard the privacy and security of personal information they process on our behalf;
- (b) where we act as a service provider or agent for a third party, we may provide that third party with personal information we collected on their behalf;
- (c) other members of the AusNet Services group, including Mondo Power Pty Ltd;
- (d) our professional advisors, accountants, insurers, lawyers and auditors;
- (e) government, regulatory, judicial or law enforcement authorities; and
- (f) any other third parties notified to you at or around the time we collect your personal information.

You should be aware that some of the persons or entities to whom we may disclose personal information, or make personal information available, are located overseas, including organisations located in India, Malaysia, Ireland and the United States.

5 DE-IDENTIFIED METERING DATA

Metering data is personal information and we handle it in accordance with the Privacy Act. We also use and disclose de-identified metering data. De-identified metering data is created by removing or obscuring all information from the metering data that links the data to an individual. De-identified metering data does not

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contain personal information. Please see the AusNet Services Metering Data Usage FAQ on the AusNet Services website at <https://ausnetservices.com.au/en/Misc-Pages/Privacy> for more information.

6 HOW WE HOLD AND SECURE PERSONAL INFORMATION

We store personal information both electronically and in paper form.

We take reasonable steps to ensure our IT systems are designed, operated and maintained in accordance with *ISO 27001: Information Security Management* and *ISO 27002 Information Technology: Security Techniques – Code of Practice for information security controls*. These standards represent international best practice for IT security.

We periodically review our information security practices to ascertain how personal information can be protected from misuse and loss, and from unauthorised access, modification and disclosure.

Unless the law requires otherwise, we take reasonable steps to destroy or permanently de-identify personal information if it is no longer required.

7 ACCESS AND CORRECTION

You may request access to and correction of personal information that AusNet Services holds about you. We will consider all requests to access and correct personal information within a reasonable time. Unless there are reasons why we cannot provide you with access to your personal information (e.g. for legal reasons), our file of the personal information we hold about you will be made available to you or corrected within a reasonable time after we receive your request. You may also have additional rights under local privacy laws which by law cannot be excluded or limited (**Non-excludable Privacy Rights**). Nothing in this Privacy Policy is intended to limit or exclude any of your Non-excludable Privacy Rights.

We take reasonable steps to periodically review our information collection and storage practices to ensure that personal information we hold is accurate, up-to-date, complete and relevant. However, you should ensure that the personal information provided to us is accurate, complete and up-to-date at the time it is provided and you should notify us of any changes to or errors in your personal information. To notify us of changes to or errors in personal information that we hold about you, please contact our Customer Support team using the details at the end of this Privacy Policy and we will amend our records as appropriate.

8 ENQUIRIES AND COMPLAINTS

The AusNet Services Customer Support team is the first point of contact for enquiries about privacy issues. If you wish to make an enquiry or complaint regarding privacy, you should contact our Customer Support team using the details at the end of this Privacy Policy.

We will endeavour to respond to your enquiry or complaint within 30 days.

If we fail to respond to a complaint within a reasonable time or if you are dissatisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner (**OAIC**). Details of how to contact the OAIC are located at www.oaic.gov.au.

9 CONTACTING AUSNET SERVICES ABOUT PRIVACY MATTERS

You may contact the AusNet Services Customer Support team on 1300 360 795 or customersupport@ausnetservices.com.au.

Alternatively, you may write to the AusNet Services Privacy Officer at:

The Privacy Officer
AusNet Services
Locked Bag 14051
Melbourne City Mail Centre 8001

privacy@ausnetservices.com.au

Last updated: 1 May 2019.

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10 SCHEDULE OF REVISIONS

| Issue | Date | Author | Details of Change |
|-------|------------|------------------|---|
| 1 | 19/10/2006 | | Privacy Policy approved by General Manager, Human Resources |
| 2 | 18/05/2011 | | Privacy Policy approved by Managing Director |
| 3 | 11/03/2014 | Catherine Earles | Privacy Policy approved by Managing Director |
| 4 | 02/09/2014 | Declan Leamy | Document rebranded from SP AusNet to AusNet Services |
| 5 | 30/03/2016 | Catherine Earles | Privacy Policy approved by Managing Director |
| 6 | 16/07/2018 | Catherine Earles | Reviewed as part of regular review and updated to improve clarity and align with best practice. Revised Privacy Policy approved by Claire Hamilton, EGM Governance. |
| 7 | 02/08/2018 | Melinda Tait | Added 'Next Review' date to front page. |
| 8 | 01/05/2019 | Catherine Earles | Amended to reflect changes to information collection and handling practices, and changes to corporate entities. |