Privacy Policy

This is the Privacy Policy referred to in the Customer Service Agreement for Uniti Retail Pty Ltd ABN 71 154 074 218 trading as Uniti Internet, Uniti Wireless and Harbour ISP.

A reference to "we", "our" or "us" is a reference to Uniti Retail Pty Ltd.

1. Introduction

We have adopted and are committed to meeting the standards set out in the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, which together govern the way we collect, store, secure, use, disclose and dispose of personal information.

2. Information we collect

We may collect the following types of personal information about you:

2.1 Information required to verify your identity, provide you with products and services and ongoing communication related to the products and services including:

(a) your name and contact details (such as address, email address, and telephone numbers);

(b) your age or birth date;

(c) your profession, occupation or job title;

(d) information about you and your business as part of our diligence process;

(e) details of the products and services that you have acquired from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;

(f) information about your usage of our services to access the internet, network usage and performance and the operation of equipment, applications or services on our network;

2.2 financial and credit information;

2.3 any additional information relating to you that you provide to us directly through our website, social media sites or indirectly through use of our website or online presence, through our representatives or otherwise;

2.4 if you are a job applicant, information that you submit to us as part of the job application process;

2.5 if you are an employee or contractor, information relating to your engagement with us; and

2.6 information you provide to us through our websites, customer service team, customer surveys, promotions or visits by our representatives from time to time.

3. How we collect your information

3.1 We may collect information:

(a) through your access and use of our social media sites, or when you call or email us;

(b) during conversations between you and our representatives;

(c) when you complete an application, form or purchase order; and

(d) when you use our networks, products or services including our customer service call centre and online services.

3.2 We may also collect personal information from third parties including:

(a) law enforcement agencies and other government entities;

(b) credit reporting body; and

(c) third parties who you have referred us to (for example, referees or authorised representatives).

4. How we maintain information security and data quality

4.1 We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

4.2 To help protect the privacy of data and personal information that we collect and hold, we maintain physical, technical and administrative safeguards. Our services are hosted in Australia in secure facilities that we own or operate, or are owned and operated by our service providers.

4.3 We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

5. How we use your information

5.1 We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of service to you. We collect, hold, use and disclose your personal information for the following purposes:

(a) to provide our products and services to you and to send communications requested by you;

(b) to consider, assess and process communications (including requests for services or complaints) received from you;

(c) to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;

(d) for the administrative, marketing (including direct marketing), planning, product or service development, research purposes of us and our related bodies corporate, contractors or service providers;

(e) to update our records and keep your contact details up to date;

(f) to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority; and

(g) to maintain our website.

5.2 Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy statement or permitted by law.

6. Disclosure of your information

6.1 We may disclose your personal information to:

(a) our related bodies corporate, contractors or service providers for the purposes of operation of our business, our websites, to satisfy the terms of our Customer Service Agreement with you, fulfilling requests by you, and to otherwise provide products and services to you (including, without limitation IT systems and network administrators, mailing houses, couriers, payment processors, data entry service providers, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants);

(b) comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority;

(c) service providers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;

(d) develop our credit assessment and credit worthiness rating system; and

(e) any organisation for any authorised purpose with your express consent.

6.2 We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

6.3 We may also disclose your personal information to credit reporting bodies for identity checking and credit related purposes (such as credit rating or worthiness, default listing, credit provision and financing). For further details, please see the 'Credit Reporting' section below.

6.4 We may, from time to time, disclose your personal information to an organisation that may be based outside the location where your personal information is collected. For example, we may share your information with other parties in Australia, Canada, countries within the European Union, India, New Zealand, Philippines and the United States of America. Where we do this, we require these parties to take appropriate measures to protect that information and to restrict how they can use that information.

7. Access and correction of your personal information

7.1 It is an important part of providing our services to you that your personal information is up to date. You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you (we will let you know at the time of the request). We will not charge for simply making the request and will not charge for making any corrections to your personal information. As part of this request, we may need to verify your identity and provide this in writing to us.

7.2 There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

7.3 If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, you may request its amendment.

8. How you can make a privacy complaint

8.1 If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We request that all complaints be made in writing, so that we can be sure about the details of the complaint. We will treat your complaint confidentially, investigate your complaint and aim to resolve your complaint within a reasonable time.

8.2 If you believe we have not dealt with your concerns, you may lodge a complaint with the Australian Privacy Commissioner (www.oaic.gov.au) or the Telecommunications Industry Ombudsman (www.tio.gov.au).

9. Credit Reporting

9.1 In providing our services to you, we may need to check your credit worthiness or assess your credit situation. This may require us to collect credit-related information from or provide personal and credit-related information to credit reporting bodies.

9.2 Credit-related 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), and can include:

(a) identification information;

(b) current and historical details about credit applications you have made, credit arrangements you have entered into and information requests made about you;

(c) information about overdue payments, default listings and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these;

(d) publicly available information relating to your credit standing (for example, bankruptcy and credit-related court judgments); and

(e) credit scores or risk assessments indicating an assessment of your credit worthiness.

9.3 Credit-related information may also include certain credit worthiness information that we have derived from the data that we receive from a credit reporting body. Sometimes we may collect this information about you from other credit providers.

9.4 We may disclose your credit information to credit reporting bodies, who in turn may include it in credit reporting information they provide to other credit providers to assist them to assess your credit worthiness.

9.5 We may use or disclose your credit information for other purposes such as:

(a) developing our credit assessment and credit worthiness rating system;

(b) processing credit-related applications and managing credit that we provide, including assisting you to avoid defaults;

(c) collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements;

(d) assigning our debts or acting in connection with any securitisation or other financing arrangement;

(e) participating in the credit reporting system;

(f) dealing with complaints or regulatory matters relating to credit or credit reporting; and

(g) when required or authorised by law.

9.6 The credit reporting bodies that we may disclose your information to are Illion Australia (www.illion.com.au). You can find their contact details and how they manage your credit information on their website.

9.7 You have the right to request credit reporting bodies not to:

(a) use your credit eligibility information to determine your eligibility to receive direct marketing from credit providers; and

(b) use or disclose your credit eligibility information if you have been or are likely to be a victim of fraud.

9.8 You have a right to obtain a copy of the credit reporting policies of any credit reporting bodies that we disclose your credit-related information to. If you would like to obtain a copy of any of these policies, you should contact the relevant credit reporting body directly using the contact details set out above.

10. Direct marketing materials

10.1 We (including our related bodies corporate) may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth).At any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

10.2 We generally do not provide your personal information to other organisations for the purposes of their direct marketing.

11. Cookies and Website Analytics

11.1 To improve your experience on our website, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

11.2 Our website may contain links to other websites. Please be aware that those other websites will have their own privacy practices over which hawse have no control and has no responsibility.

11.3 Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. By using our website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

11.4 Our website may also interface with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

12. Contact us – Privacy Policy Enquiries

If you have any questions about this document, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Privacy Officer using the details set out below. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer

Uniti Group Pty Ltd

Level 16 / Suite 1, 323 Castlereagh Street, Haymarket, NSW, 2000

Phone: 1300 847 201

Email: privacy@unitiinternet.com