

PRIVACY POLICY STATEMENT

About this summary

Melbourne Phone Company are committed to providing you the consumer with the highest level of customer care and this includes protecting your privacy. This Privacy Policy Statement sets out the approach that Melbourne Phone Company takes in relation to the treatment of your Personal Information. It includes information on how Melbourne Phone Company collects, uses, discloses and keeps secure, your Personal Information. It also covers how Melbourne Phone Company makes the Personal Information it holds available for access to and correction by the individual.

As the privacy policy relates to your personal information that Melbourne Phone Company collect we recommend that you keep a copy of this statement for future reference.

Your Personal Information

Melbourne Phone Company collects Personal Information primarily to supply customers with the products and services ordered from it. We will only collect Personal Information where the information is necessary for Melbourne Phone Company to perform one or more of its functions or activities.

Personal Information held by Melbourne Phone Company can include your name, date of birth, current and previous addresses, phone numbers including landline and mobile, email addresses, bank account details, credit card information, occupation, drivers licence number and any Melbourne Phone Company login details and passwords. It is up to you whether you choose to supply personal information that we request from you however if you decide not to provide certain personal information, we may not be able to provide you with the services you wish to ensue with Melbourne Phone Company.

If you choose to elect an Authorised Representative as part of your service with Melbourne Phone Company you may need to provide us with personal information about that person such as name, date of birth and the relationship that person has with you. If this is the case, we rely on you to inform that individual that you are providing their personal information to Melbourne Phone Company and to advise them that if they have further questions they can contact Melbourne Phone Company.

How Melbourne Phone Company collects Personal Information

Melbourne Phone Company collects personal information in a number of ways, including:

- directly from you, when you provide information by phone, email or in application forms or when you submit your personal details through our website
- from third parties such as our related companies, credit reporting agencies or your authorised representatives;
- from publicly available sources of information; and
- when legally required to do so, such as under relevant telecommunications legislative instruments.

Melbourne Phone Company also collects and uses Personal Information for secondary purposes including:

- Billing and account management
- Business planning and product development
- To provide individuals with information about promotions, as well as the products and services of other Melbourne Phone Company companies and other organisations.

Melbourne Phone Company will notify individuals of the matters listed below before collecting any Personal Information:

- The main reason that we are collecting Personal Information;
- Other related uses or disclosures that we may make of the Personal Information;
- Our identity and how individuals can contact us;
- That individuals can access the Personal Information that Melbourne Phone Company holds about them;
- Individuals should contact our customer service department if they wish to access, correct or alter Personal Information collected by Melbourne Phone Company; and
- Organisations to which we disclose Personal Information to.

Where it is not practicable for Melbourne Phone Company to notify individuals of all of the Collection Information before the collection of the Personal Information, Melbourne Phone Company will ensure that individuals are notified of the Collection Information as soon as possible after the collection.

How Melbourne Phone Company holds Personal Information

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and we take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure.

For example, our IT systems feature password protections, firewalls, and intrusion detection and site monitoring functionalities. Further, our staff members receive regular training on our strict privacy and confidentiality procedures in relation to all personal information stored by us electronically and in printed form.

We will retain your personal information whilst it is required for our business functions or any other lawful purpose. We use secure methods to destroy or permanently de-identify your personal information when it is no longer needed.

How Melbourne Phone Company uses your Personal Information

Melbourne Phone Company will obtain an individual's consent for use of non-sensitive Personal Information for Secondary Purposes at the time of collection. Melbourne Phone Company will not use Personal Information without taking reasonable steps to ensure that the information is accurate, complete and up to date. Melbourne Phone Company uses your Personal Information to:

- verify your identity;
- assist you to subscribe to our services;

- provide the services you require;
- administer and manage those services, including charging, billing and collecting debts;
- inform you of ways the services provided to you could be improved;
- conduct appropriate checks for credit-worthiness and for fraud;
- research and develop our services; and
- gain an understanding of your information and communication needs in order for us to provide you with a better service.

Also, your personal information is collected so that we can promote and market services to you (including by way of direct mail, telemarketing and email). This is to keep you informed of products, services and special offers and may continue after you cease acquiring services from us. If you do not wish us to contact you to promote and market products, services and special offers to you, please call Melbourne Phone Company on 1300 887 939.

When we disclose your personal information

Melbourne Phone Company may disclose your personal information to organisations outside of Melbourne Phone Company. Melbourne Phone Company may Disclose Personal Information to related or unrelated third parties if consent has been obtained from the individual. This will include obtaining the individual's consent for Disclosures made under the credit reporting requirements of the *Privacy Act 1988*. Your personal information is disclosed to these organisations only in relation to us providing our services to you. These organisations carry out our:

- customer enquiries;
- mailing operations;
- billing and debt-recovery functions;
- information technology services;
- installation, maintenance and repair services;
- marketing and telemarketing
- market research; and
- website usage analysis.

We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information. Melbourne Phone Company will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with the Use and Disclosure requirements of the *Privacy Act 1988* and ensure that these organisations are bound by confidentiality and privacy obligations.

In addition, Melbourne Phone Company may disclose your Personal Information to:

- your authorised representatives or your legal advisers;
- credit-reporting and fraud-checking agencies;
- credit providers;

- our related companies;
- our professional advisers, including our accountants, auditors and lawyers;
- other telecommunication and information service providers (for example, if you obtain services from other providers, we may need to disclose your personal information for billing purposes);
- government and regulatory authorities and other organisations, as required or authorised by law; and
- organisations who manage our business and corporate strategies, including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our corporate risk and funding functions (e.g. securitisation).

If a Disclosure is not for a Primary Purpose; is not for a related Secondary Purpose; or upfront consent has not been obtained, Melbourne Phone Company will not Disclose Personal Information otherwise than in accordance with the exceptions set out above.

How Melbourne Phone Company ensures accuracy of information

Melbourne Phone Company takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. We will review, on a regular and ongoing basis, its collection and storage practices to ascertain how improvements to accuracy can be achieved. The accuracy of this personal information depends however to a large extent on the information you provide Melbourne Phone Company with. It is important that you contact Melbourne Phone Company to let us know if any of the information we have collected is incorrect or if any of your personal details have changed

How Melbourne Phone Company handles your personal information internally

Melbourne Phone Company requires employees and contractors to perform their duties in a manner that is consistent with Melbourne Phone's legal responsibilities in relation to privacy. Melbourne Phone Company will take all reasonable steps to ensure that paper and electronic records containing Personal Information are stored in facilities that are only accessible by people within Melbourne Phone Company who have a genuine "need to know" as well as "right to know" basis. Melbourne Phone Company will review, on a regular and ongoing basis, its information and security practices to ascertain how ongoing responsibilities can be achieved and maintained.

How Melbourne Phone Company transfers personal information overseas

If Personal Information must be sent by Melbourne Phone Company overseas for sound business reasons, Melbourne Phone Company will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with the Australian Privacy Principles, preferably as part of the services contract.

You can access your personal information

Melbourne Phone Company will allow its records containing Personal Information to be accessed by the individual concerned in accordance with the *Privacy Act 1988*. Melbourne Phone Company will correct its records containing Personal Information as soon as practically possible, at the request of the individual concerned in accordance with the *Privacy Act 1988*.

Individuals wishing to lodge a request to access and/or correct their Personal Information should do so by contacting Melbourne Phone Company in writing at the contact details listed below. Melbourne Phone Company reserves the right to charge a fee for searching for and providing access to your information.

How to contact us

If you have any questions in relation to privacy, please contact us on our Privacy Liaison as follows:

Ph: 1300 887 939

Email: support@mphone.com.au

Please note that any calls may be made between 9.00am and 5.00pm, Monday to Friday.

If you make a complaint about privacy, we will acknowledge receipt of your complaint, and try to investigate and respond to you within 30 days. If you are unhappy with the outcome, you can lodge a complaint with the Telecommunications Industry Ombudsman or the Office of the Australian Information Commissioner.

Changes to this document

Similar to our other policies we regularly review and edit this document so as to ensure its effectiveness and accurateness. We do so at the discretion and may do so without notice. The latest version will be available on our website and when we do make changes to it the changes will be posted on our website.