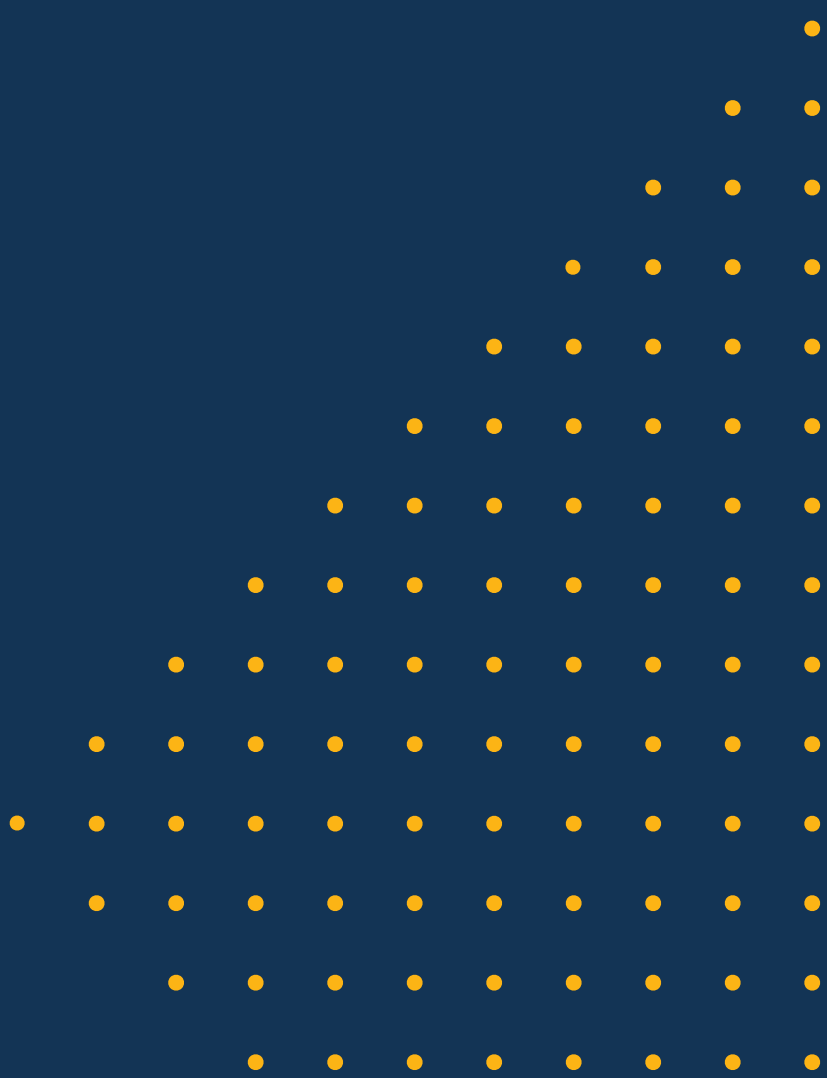




Privacy Policy

Energy Locals Group

energylocals.com.au



1. ABOUT THIS POLICY

Energy Locals will always do the right thing by its customers, and we know privacy is important to you. To provide you with a service, we need to collect, store and in some cases share personal information.

This policy explains how Energy Locals handles your personal information in order to protect your privacy and to meet our obligations under the *Privacy Act 1988 (Cth)* (the **Privacy Act**).

This policy also includes our credit reporting policy which describes how we handle your credit related information and comply with our credit reporting obligations.

We are committed to following the Australian Privacy Principles under the Privacy Act to protect the privacy of all our customers.

2. ENERGY LOCALS

This policy relates to all activities of Energy Locals Pty Ltd (ACN 606 408 879) and Energy Trade Pty Ltd (ACN 165 688 568) (**Energy Locals**) including the use of affiliated website.

References to “us”, “we” and “our” in this policy are references to Energy Locals, its related bodies corporate and its contractors.

3. WHAT IS PERSONAL INFORMATION

Information that can be used to identify an individual (such as name, address and so on) is classified as personal information. Personal information has the same meaning given in the Privacy Act and also includes sensitive information and credit related information.

Sensitive information includes information or an opinion about a person’s racial or ethnic origin, political opinions or associations, religious beliefs or affiliations, philosophical beliefs, professional or trade association or union membership, sexual orientation or practices, criminal records, health information, genetic information and biometric information and templates.

Credit related information includes information that relates to how someone manages their credit, their credit history, payment and default history and includes credit eligibility information.

Credit eligibility information refers to personal information related primarily to credit related dealings with other credit providers and includes detailed credit reporting information received from a credit reporting body (including credit scores) and any information derived from a credit check.

4. CONSENT

By providing your personal information or electing to utilise our services and website, you will be deemed to consent to Energy Locals using your personal information in a manner consistent with this policy.

5. WHY AND HOW WE COLLECT PERSONAL INFORMATION

Energy Locals will only collect personal information if it's necessary for one or more of the services we provide to you.

Where possible, Energy Locals will always collect personal information directly from you, either via a form you completed on our website, email, post or via a phone conversation with you (the phone conversation could be with Energy Locals, or a third party authorised to work on behalf of us). We may also collect personal information via or on behalf of a community or commercial partner of Energy Locals, who we work with to sell services under our licence or retailer authorisation.

There are also situations in which we may collect information about you from third parties. For example, we may need to collect meter data from a distribution company or metering coordinator so we can calculate your usage, or we may need information from your existing energy retailer so we can fulfil your request to transfer to us.

6. TYPE OF PERSONAL INFORMATION WE COLLECT

The personal information we collect will vary depending on the circumstances but, in all cases, we will only collect information about you that is relevant to our business relationship. For example, we may collect the following information about you as a customer, or prospective customer:

- your name;
- your contact details such as postal address and telephone number;
- proof of identification documentation details (including identification numbers from drivers licence, passport, Medicare card or proof of age card);
- information about our interaction with you;
- your credit related information (see our credit reporting policy in section 10 below);
- the address of premises at which our service is provided
- the type of service you have requested; and
- and other relevant details that will assist in our business dealings with you.

At times, we may also collect records of your electricity consumption, and if applicable, your load profile.

In some circumstances, we may also collect and maintain sensitive information where there are special health requirements. This information regarding special electricity supply (such as dependence on life support equipment) will only be collected from you, or from your previous energy retailer, as per your request for special supply arrangements.

Please see our Life Support Policy, our Hardship Policy, and our Family & Domestic Violence Policy available at <https://energylocals.com.au/hardship/> for more information on special arrangements for vulnerable customers.

Customer telephone calls may be recorded for quality, security, and compliance purposes. If you do not wish your call to be recorded, please inform the customer service operator.

7. HOW WE KEEP YOUR INFORMATION SECURE

We will store your information electronically wherever possible. Mostly this will be within our customer billing system. Where other information needs to be stored electronically, it will be held in password protected storage areas and only staff who need access to the personal information will be able to retrieve it.

Energy Locals takes information security seriously and has an Information Security policy to ensure the confidentiality of all information assets, including personal information, is protected. Information must only be used for its intended business purpose and is classified to ensure appropriate controls are in place.

If we receive physical documentation with personal information, it will be held using reasonable security precautions at our offices and securely destroyed when no longer required.

8. USE OF YOUR INFORMATION

To provide you with our services, we may use your personal information in a number of ways, such as:

- setting up and maintaining your electricity supply with us;
- confirming your identity;
- emailing you with relevant information about your account with us, or about products and services we offer which may benefit you;
- communicating with you;

- carrying out credit checks, receiving payments and collecting debts;
- providing you with information on related products and services;
- reporting to regulatory bodies;
- where you have a battery and/or electric vehicle as part of a Virtual Power Plant (VPP) proposition, for the purposes of assessing the performance of the battery and/or electric vehicle and for the efficient operation of the VPP; and
- assessing the performance of our business (at an aggregate, not individual customer, level).

If you leave Energy Locals, your personal information may be used to:

- collect any money you may owe on your account;
- ask you for your feedback on us;
- provide you with information about our products and services (unless you opt out of receiving communications from us);
- report, on an aggregate rather than individual basis, how our business is performing; or
- report to regulatory bodies as required.

9. DISCLOSURE OF YOUR INFORMATION

Your personal information will not be disclosed outside Energy Locals except as outlined in this policy.

Disclosure to third parties

There may be occasions where we need to disclose your personal information to third parties, such as when:

- we are required to by law, or it is requested by Police, other Government authorities or regulatory bodies;
- your local distribution company, metering coordinator, metering provider or any network operator requires information to maintain your supply or resolve a dispute;
- you have had a battery and/electric vehicle as part of a VPP proposition;
- we carry out a credit check (see our credit reporting policy in section 10 for information on how we handle your credit related information);
- we need to use a third party to collect overdue debt;
- you choose to move to a different energy retailer;
- we need to engage a software or cloud services provider in order to deliver our services to you;

- we need to work with an ombudsman or other approved body to resolve a complaint or dispute;
- we engage a marketing and advertising agency to improve our communication to you;
- we need to engage professional advisors (such as accountants, auditors, and lawyers);
- we engage mailing and logistics providers to deliver your bills;
- we are concerned about your welfare and need to contact a support service on your behalf;
- there is a permitted health situation;
- we need to communicate with one of our community or commercial partners to tell them which customers have chosen to support them, to provide you with a service, to manage your account or to report on the performance of our business at an aggregate level; or
- you tell us we can do this or direct us to share information on your behalf.

Overseas disclosure

From time to time, it may be necessary to transfer information outside of Australia in order to process it and provide our services to you. The countries it may be necessary to transfer personal data to include the United States of America and any country in which the third parties operate.

For example, if you are on a Virtual Power Plant proposition where you have a battery and/or electric vehicle as part of a Virtual Power Plant (**VPP**), information obtained from that battery and/or electric vehicle may be passed to and held by another entity in relation to the VPP and/or transferred overseas to a subcontractor for processing. Where information is passed overseas, secure transfer and storage methods will always be used.

10. CREDIT REPORTING POLICY

This section of our policy is our Credit Reporting Policy, which sets out how we will collect, use, hold and disclose your credit related information to comply with our obligations under the Act and the *Privacy (Credit Reporting) Code (Cth) 2014* (Code).

As we provide our services to you on credit (that is, you will pay for those products or services after we start providing them to you), we are a credit provider for the purposes of the Privacy Act and must comply with the rules in the Privacy Act and Code in relation to handling of information relating to credit reporting.

Collection of credit related information

We only collect your credit related information in order to assist us in determining whether we will provide our services to you on credit.

The type of credit related information that we collect from you directly or from third parties, including from credit reporting bodies and other credit providers, may include:

- identification information including your name, address, contact details, gender and date of birth;
- proof of identify documentation; and
- credit eligibility information including:
 - any credit score or assessment that a credit reporting body can provide to us;
 - your credit history (including any repayments or late repayments you have made);
 - details of any credit you have sought or obtained from other credit providers;
 - details of any credit related court proceedings or insolvency applications that relate to you.

Use and disclosure of credit related information

We only use and disclose your credit related information as permitted by Part IIIA of the Privacy Act and the Code.

We may disclose your credit related information to credit reporting bodies and these credit reporting bodies may provide us with reports that include credit eligibility information such as your credit score to assist us in assessing your creditworthiness.

Your credit related information may be used for the following purposes:

- to assess your application;
- to consider whether we should provide services to you on credit;
- to collect payments that you owe us; and
- to comply with the law or a request from a court or tribunal.

Should you fail to meet your payment obligations to us, commit fraud or commit a serious credit infringement, we may be required to disclose this information to credit-reporting bodies.

We will store any credit related information you provide to us, or which we obtain about you, securely with any other personal information we hold about you.

Relevant credit reporting body

The credit reporting body we disclose your credit related information to is Equifax Australia Information Services and Solutions Pty Limited (Equifax).

You can contact the Equifax or visit their website to see their policies on the management of credit related information.

Equifax Australia

GPO Box 964, North Sydney NSW 2059

www.equifax.com.au/credit-reporting-policy

Overseas disclosure of credit related information

We do not store credit related information overseas, however the credit reporting body we may disclose credit related information to may engage third parties based overseas.

Correction of credit related information

You may ask for access to any credit related information that we hold about you and seek a correction. See section 14 of this policy below.

We will correct the credit related information if we are satisfied that the information, we hold is inaccurate, out-of-date, incomplete, irrelevant, or misleading. We may consult with other credit providers and credit reporting bodies about your request.

We will notify you about the corrected information. We can't guarantee we'll be able to meet every request to change or delete information and if we can't, we'll explain why.

11. YOUR PAYMENT DETAILS

We do not store credit card data. All credit card data is encrypted and stored by our payment card industry compliant payments partner. The transfer of bank account data (e.g. BSB and account number) always takes place using a TLS (Transport Layer Security) protocol.

12. YOUR OWN LOGIN DETAILS

When you set up a login for online access to your Energy Locals account, it's your responsibility to keep those details secure. Please log out after using the Energy Locals website if others have access to the same computer or device.

13. COOKIES AND USE OF OUR WEBSITE

This policy also applies to the use of our website and any personal information that you provide to us when using our website. Please see our website terms and conditions of use available at <https://energylocals.com.au/terms-and-conditions-of-website-use/> for more information.

Like most websites, Energy Locals uses cookies to help improve the experience people have when dealing with us online. Cookie files can't be used to access your computer, or the information stored on it. To help improve our website and online experience, we use analytical tools to measure how the website is used.

In order to keep our electricity prices low, we may introduce advertising on the Energy Locals website. This would involve the use of cookies to better select advertising that may be relevant to you, but your private data would not be shared with any advertiser.

If you start the process to join Energy Locals but do not complete the application, we may use the information you entered up to that point to contact you by phone or email to see if we can help.

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website, and we are not responsible for the privacy policies or the content of any third-party website. Third party websites are responsible for informing you about their own privacy practices.

14. YOUR ACCESS TO YOUR PERSONAL INFORMATION

You can ask us to share with you the personal information we hold about you. You can do this by emailing us at hello@energylocoals.com.au.

If you think that we are holding inaccurate information, you can ask us to change or delete it. We can't guarantee we'll be able to meet every request to change or delete information and if we can't, we'll explain why.

If we're sending you information about new products and services that you don't want to receive, you can opt out of these communications at any time by unsubscribing or emailing hello@energylocoals.com.au.

15. COMPLAINTS

If you feel we have not complied with this policy or if you have a complaint about how we handle your personal information or credit related information, or if you have a consider we are not complying with the Privacy Act or Code please contact us so we can investigate.

You can contact us by emailing complaints@energylocals.com.au or writing to us at Energy Locals, 2/11 Newton Street, Richmond, Victoria 3121.

Please see our Complaints Dispute Resolution Procedure available at <https://energylocals.com.au/complaints/>.

If you are not satisfied with how we have managed your privacy complaint you can contact the Australian Privacy Commissioner who can be found at the Office of the Australian Information Commissioner (OAIC). Please see <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us> for more information on how to lodge a complaint with OAIC.

You can contact OAIC by:

An online enquiry at: <https://www.oaic.gov.au/contact-us>

Phone: 1300 363 992

Mail: GPO Box 5288, Sydney NSW 2001

16. CHANGES TO THIS POLICY

Energy Locals may modify this policy at any time, and we'll notify you of any substantive changes by posting a message on our website.

Energy Locals Company Secretariat	
Version	2.0
Approved by	Compliance, General Counsel
Approval Date	27/03/2024
Review Date	Every two years or upon significant changes to operations or structure.
If you have questions, contact:	Legal & Compliance



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