

## **PRIVACY AND CREDIT REPORTING POLICY**

### **1. Introduction**

GloBird Energy Pty Ltd (**GloBird Energy**) respects your privacy, and aims to manage your private information at all times in a manner which is compliant with Australia's privacy laws, including the *Privacy Act 1988 (Cth)* (**Privacy Act**).

The Privacy Act regulates the collection, use, storage, and disclosure of personal information and sensitive information, and access to and correction of that information. What constitutes personal information and sensitive information is also set out in the Privacy Act.

The Privacy Act also regulates how credit reporting bodies and credit providers handle information relating to credit reporting.

This privacy and credit reporting policy describes the practices, procedures and systems we use to ensure our compliance with the Privacy Act and other applicable privacy laws and regulations in relation to personal information, sensitive information and credit related information. As such, this policy addresses:

- The kinds of personal information, sensitive information and credit related information we collect, and how we collect and hold it.
- How and why we use such information, including who we disclose it to.
- What we do with such information if we no longer need it.
- How you can access and correct such information.
- How you can make a complaint in relation to privacy, and how we will handle your complaint.
- How we review this policy.

Copies of this policy can be downloaded for free on our website:  
[www.globirdenergy.com.au](http://www.globirdenergy.com.au).

Alternatively, you can contact us to request a paper copy of this policy, and we will send one to you free of charge. Our contact details are:

GloBird Energy

Telephone: 1300 GloBird (1300 456 247) or 1300 516 888 (中文)

Email: [customerservice@globirdenergy.com.au](mailto:customerservice@globirdenergy.com.au)

Address: 2A Monomeeth Drive, Mitcham Vic 3132

### **2. Kinds of personal information and sensitive information we collect**

As an energy retailer, we need you to provide us with certain personal information, and sometimes sensitive information, so that we can identify you and provide you with our services. We will obtain your consent to us doing this. Generally we will do this when you enter into an electricity or gas retail agreement with us, at which time we will ask you to expressly consent to us collecting necessary personal information and sensitive information. If you are unwilling or unable to provide us with the personal information or sensitive information we require, we may not be able to offer you our services.

The information we require may change from time to time, so you may also need to provide us with additional information on an ongoing basis.

When we collect your personal information or sensitive information, we will provide you with relevant information in relation to our privacy obligations and your privacy rights, including a copy of this policy and our contact details, if we have not already done so.

Common examples of the sorts of personal information and sensitive information we require for our business include:

*Personal information*

- Your name, address and other contact details.
- Your identification details (such as the number of your driver's licence).

*Sensitive information*

- Health information, if you require life support or other special medical equipment at your premises.

**3. How we collect and hold personal information and sensitive information**

We may collect personal information and sensitive information in many ways, including via mail, email, telephone or our website, or directly in face-to-face meetings. We will only use lawful and fair means to collect this information, and will always collect the information from you directly (including where you provide it through our website), unless it is unreasonable or impracticable to do so.

If we receive personal information or sensitive information which we do not need and did not request or seek, we will destroy or de-identify the information in accordance with clause 11 of this policy, and in any event will not disclose the information.

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We implement a range of measures to protect the security of that personal information.

Any personal information or sensitive information we require will be collected, managed and protected at all times in accordance with the Privacy Act, other applicable privacy laws and regulations and this policy.

**4. Use of personal information and sensitive information**

*Personal information*

We use your personal information to confirm your identity, and to provide you with services in accordance with your electricity or gas retail agreement and the applicable laws and regulations.

We also use your personal information to analyse the services that we provide, and to develop our business and product offerings. As a result, we may use your personal information to send you marketing messages and to inform you of new offers or promotions, unless you have asked us not to do this or to do so would be illegal or inappropriate. When we send marketing messages we will include an easy "opt out" option that will give you the opportunity to stop any future marketing messages being sent to you. You can also contact us via email or phone and request to "opt out" if you no longer wish to receive marketing messages from us.

We will also comply with all other applicable laws in conducting any marketing activities, including the *Spam Act 2003 (Cth)* and the *Do Not Call Register Act 2006 (Cth)*.

### *Sensitive information*

We recognise the importance of protecting the privacy of sensitive information. We only collect or use sensitive information where necessary for purposes directly related to our provision of services, or to comply with legal obligations to which the sensitive information relates, e.g., working with network operators to ensure the electricity supply to homes of people on life support is maintained.

## **5. Disclosure of personal information and sensitive information**

Unless the Privacy Act provides otherwise, we will not disclose your personal information or sensitive information to any third party without your consent.

Generally, by entering into an electricity or gas retail agreement with us you will have expressly consented to us disclosing personal information and sensitive information, where necessary. However, if consent is not provided, we may not be able to offer our services.

Where consent has been provided, we may disclose your personal information and sensitive information to the following third parties, but only for the purpose of our provision of services:

- Government, law enforcement agencies, and regulatory authorities where required by law.
- Network service providers so that we can supply electricity or gas or both to you.
- Service providers that help us with billing, meter reads, insurance, credit checking, marketing and debt collection.
- Companies and people related to us, including our lawyers, advisers and auditors.

We keep records of all disclosures and, where required, we will de-identify the information before disclosing it.

We will not sell your personal information, sensitive information or credit related information to other parties, nor does our business ordinarily require us to disclose such information to parties overseas or entities that do not have an Australian link.

## **6. Credit and credit eligibility information**

Where we provide products or 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. As such, we must comply with rules in the Privacy Act in relation to the handling of information relating to credit reporting.

We may collect credit related information about you, and hold that information electronically and in hard copy form, both at our own premises and with the assistance of our service providers, when you apply for and open an account with us.

This includes information we collect from you, but may also be collected from other credit providers and from credit reporting bodies.

The credit reporting body we currently use to perform credit checks is Veda Advantage Information Services & Solutions Pty Limited (**Veda**).

The credit related information we collect and hold includes:

- Your personal details such as identification and aliases.
- Your credit history.

- Details of any credit you have sought or obtained from other credit providers.
- Any credit rating or credit assessment score that a credit reporting body may provide to us.
- Details of prior overdue payments, credit infringements, defaults, bankruptcies and judgments.

We collect, hold and use this credit related information to evaluate your credit eligibility and what level, if any, of credit we can provide to you or continue to provide to you, and to manage our relationship with you. This may see us deriving a credit assessment score in relation to you from information disclosed to us by credit reporting bodies.

If your application for credit is refused by us based on information provided to us by a credit reporting body, we will inform you of this and provide you with the name and contact details of that body.

If permitted by law, we may disclose your credit related information to Veda or any other credit reporting body, including information about your application, payment history and defaults. These credit reporting bodies may disclose this credit information to other credit providers while assessing your credit worthiness.

We may report to any credit reporting body any information regarding your outstanding payments, defaults or payments more than 60 days overdue when we are permitted by law to do so. If the credit we have provided to you, including any late payment fees, accrued interest, or other fees we are legally permitted to charge, is then paid or is otherwise discharged, we will notify the credit reporting body that your payments are no longer outstanding.

If permitted by law, we may also disclose information about you to debt collectors and other third parties providing credit related services to us, and to third parties to whom we may assign your debts.

## **7. Security**

We take all reasonable steps to keep your personal information, sensitive information and credit related information secure and secret, to manage security risks, and to protect the information from misuse, interference, unauthorised access, modification, disclosure or loss. We review and update our security systems and procedures from time to time to ensure security and secrecy is maintained.

## **8. Other websites**

We take all reasonable care to make our website a secure environment. We cannot, however, control third party websites. For this reason, this policy does not cover third parties or their websites. Where our website contains links to third party websites, we cannot make guarantees regarding the privacy practices of these third parties.

## **9. Access to information**

You can request a copy of the personal information, sensitive information and credit related information that we hold about you at any time, by contacting us using the contact details given above. We will provide a written response to your request within a reasonable time, generally within 10 business days after hearing from you. We will provide you with a copy of or other access to the information in the manner you request, unless it is unreasonable, impractical or illegal to do so.

If we do not give you access to your information, we will give you a written explanation of the reasons for this, as well as information as to how you can complain about our decision.

**10. Correction of information**

If any change to your personal information, sensitive information or credit related information is required, for example because it is inaccurate, out-of-date, incomplete, irrelevant or misleading, or if you request us to correct the information, we will take all reasonable steps to make the necessary changes, or to add a note to the information clearly specifying its flaws.

If you have requested us to correct your information, we will provide a written response to your request within a reasonable time, generally within 10 business days after hearing from you. If we do not make the relevant changes, we will give you a written explanation of the reasons for this, as well as information as to how you can complain about our decision.

If we correct credit related information that we hold about you, we will, within a reasonable period, notify you, each other credit provider and credit reporting body and any other third party to which we have previously disclosed that information of that correction unless it is impracticable or illegal to do so.

**11. Information we no longer need**

If we no longer need a particular piece of personal information, sensitive information or credit or credit eligibility information for the purpose for which we collected it, we will: (a) return the information to the relevant person; (b) destroy the information; or (c) de-identify the information to the extent possible.

However, we do need to retain records and archives of certain information, both for business and compliance purposes. In doing so, we may also need to retain the identities of persons identified in the information. This means that although we may have stopped using particular information, we may still need to keep it and access it from time to time, and be able to identify the relevant persons. In these circumstances, we will not return, destroy or de-identify the information.

**12. Anonymity and pseudonyms**

Whenever you communicate with us, whether in relation to a privacy matter or any other matter, you can choose to remain anonymous or to use a pseudonym. Just let our staff know if this is your preference and, unless it is illegal or impracticable, we will be happy to communicate with you on that basis.

**13. Use of anonymous information**

We collect general information from our website in order for us to improve your website experience. Like most websites, we record traffic statistics and each visitor's IP address. We may also use cookies. Cookies are commonly used by websites. They are small data files sent to a visitor's computer to record website information. This kind of information is general in nature.

**14. Complaints**

If you are concerned about the way we have handled your personal information, sensitive information or credit related information, you should first contact us, using the contact details given above. We will provide a written response to your request within a reasonable time, generally within 10 business days from hearing from you.

If you are not satisfied with our attempt to resolve your concerns you can register an official complaint. We will respond to your complaint in a timely manner and in accordance with our complaints resolution policy. A full copy of our complaints resolutions policy is available for download on our website: [www.globirdenergy.com.au](http://www.globirdenergy.com.au). You can contact us using the information given above if you would like to request a free copy of our complaints resolution policy.

We hope that any issue you raise will be fixed by our customer service staff, or by escalating the issue to a senior manager. However, if we fail to provide you with a satisfactory outcome, you can refer the complaint to the relevant Energy Ombudsman in your jurisdiction.

If your complaint is that we have failed to comply with the Privacy Act or the Privacy (Credit Reporting) Code regarding access to or correction of any credit related information that we hold about you, you can also complain directly to the relevant Energy Ombudsman or to the Office of the Australian Information Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au). We will notify each other credit provider and credit reporting body to which we have previously disclosed that information about your complaint and about the outcome, unless it is impractical or illegal to do so.

#### **15. Review of this policy**

We may, from time to time review and update this policy, including when new or amended laws come into place. All personal information, sensitive information and credit related information held by us, and how we collect, hold, use, disclose and otherwise manage that information, will be governed by the most recently updated policy.