
AusNet Services Privacy Policy

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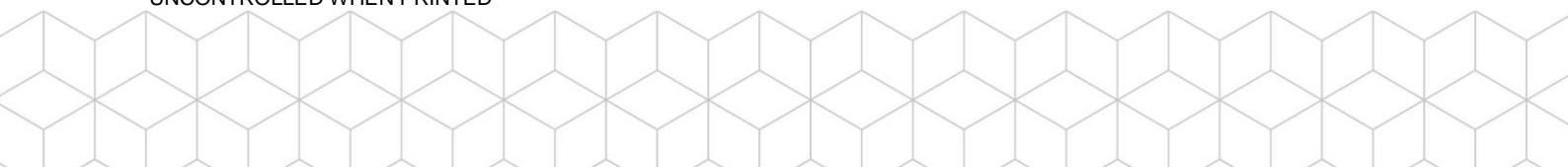
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AusNet Services Privacy Policy

1 INTRODUCTION

This Privacy Policy sets out the approach which AusNet Services, its directors, employees, agents and contractors will take in relation to the treatment of Personal Information. In the context of this Privacy Policy, AusNet Services means all companies in the AusNet Services group, including:

- AusNet Services Ltd;
- AusNet Services (Distribution) Ltd;
- AusNet Services (Transmission) Ltd;
- AusNet Transmission Group Pty Ltd;
- AusNet Gas Services Pty Ltd;
- AusNet Electricity Services Pty Ltd;
- AusNet Asset Services Pty Ltd;
- Select Solutions Group Pty Ltd; and
- Geomatic Technologies Pty Ltd.

This Privacy Policy:

- explains how AusNet Services will collect, use, and disclose Personal Information, and how it will keep that information secure;
- outlines the procedures to gain access to or change Personal Information which AusNet Services holds, and to make a complaint concerning AusNet Services' handling of Personal Information; and
- applies to all Personal Information collected by AusNet Services, including the Personal Information of customers, suppliers, contractors and employees (except to the extent that Personal Information is contained in an employee record).

2 DEFINITIONS & INTERPRETATION

In this Privacy Policy:

Disclose and **Disclosure** refer to the release of information to individuals or organisations outside AusNet Services, including under a contract to undertake any outsourced functions.

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Primary Purpose means the purpose or purposes for which the Personal Information is collected and, generally (but without limitation):

- (a) in respect of customers, means one or more of the following:
 - (1) connecting or maintaining a supply of gas and/or electricity, including notifying customers about interruptions, faults, outages or emergencies;
 - (2) validating a customer's request for access to AusNet Services' *myHomeEnergy* portal;
 - (3) validating a customer's request for access to their metering data (or a request to authorise a third party to access their metering data);
 - (4) installing, supplying and maintaining meters, and providing meter reading and testing services;
 - (5) providing such other products or services as may be offered by AusNet Services from time to time and providing information about their availability, features and benefits, including

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- products or services which AusNet Services offers to its customers in response to a government policy or regulatory initiative;
- (6) providing billing and account management services associated with the products or services AusNet Services provides;
 - (7) responding to an enquiry from a customer, or to investigate or resolve a complaint made by that customer;
 - (8) enabling AusNet Services to comply with its legal and regulatory obligations;
- (b) in respect of suppliers, means acquiring goods or services from such suppliers;
- (c) in respect of contractors, means recruitment and selection, and administering the contracting relationship;
- (d) in respect of individuals who are not customers, means:
- (1) maintaining a supply of gas and/or electricity;
 - (2) providing a quote to provide products or services;
 - (3) fulfilling a contractual obligation owed by AusNet Services to a third party; or
 - (4) recruitment and selection for future employment with AusNet Services.

Privacy Act means the *Privacy Act 1988* (Cth).

Secondary Purpose means a purpose for which Personal Information is Used or Disclosed other than the Primary Purpose, which is one or more of the following:

- (a) operating, maintaining, managing, planning and developing AusNet Services' energy networks;
- (b) business planning and product development;
- (c) identifying and inviting customers to participate in surveys or trials of new products or services;
- (d) notifying customers of new products or services;
- (e) a Use or Disclosure which the individual would reasonably expect and which is related (and, in the case of Sensitive Information, directly related) to the Primary Purpose;
- (f) any other Use or Disclosure for which the individual has given consent.

Sensitive Information means:

- (a) information or an opinion about an individual's:
 - (1) racial or ethnic origin;
 - (2) political opinions;
 - (3) membership of a political association;
 - (4) religious beliefs or affiliations;
 - (5) philosophical beliefs;
 - (6) membership of a professional or trade association;
 - (7) membership of a trade union;
 - (8) sexual preferences or practices; or
 - (9) criminal record,

that is also Personal Information; or

- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information.

Use means applications to which Personal Information can be put, including incorporating that information into a publication, but does not include mere Disclosure of that information.

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Unsolicited Personal Information means Personal Information, or a kind of information which includes Personal Information or which allows Personal Information to be reasonably deduced, that AusNet Services receives from the individual or a third party, and which AusNet Services did not request the individual or third party to provide.

Nothing in this Privacy Policy changes AusNet Services' existing obligations under the Privacy Act, and the Privacy Act prevails to the extent of any inconsistency.

3 OPENNESS AND TRANSPARENCY

Description of Personal Information

- (a) The kinds of Personal Information AusNet Services collects and holds about its customers includes:
- (1) the account holder's name and contact details (e.g. postal address, telephone number and email address);
 - (2) the site address to which AusNet Services supplies products or services, including:
 - a. electricity and/or gas;
 - b. meters and associated services including meter exchange, installation, maintenance, reading and testing;
 - (3) billing information;
 - (4) metering data;
 - (5) Sensitive Information relevant to the provision of services by AusNet Services to the customer's premises (such as a health condition that requires special electricity supply conditions); and
 - (6) such other Personal Information that is necessary to enable to AusNet Services to provide its products and services to its customers.
- (b) The kinds of Personal Information AusNet Services collects and holds about its suppliers includes the names and contact details of individuals AusNet Services deals with in order to acquire goods or services.
- (c) The kinds of Personal Information AusNet Services collects and holds about its contractors includes the names and contact details of individuals AusNet Services deals with in order to administer the contract and manage the contracting relationship.
- (d) The kinds of Personal Information AusNet Services collects and holds about individuals who report a fault, outage or other supply interruption but who are not the account holder includes the individual's name and contact telephone number.
- (e) The kinds of Personal Information AusNet Services collects and holds about individuals who are not customers, where collecting or holding the information is necessary to enable AusNet Services to meet its contractual obligations to a third party, may include the individual's address, metering data and billing information.
- (f) The kinds of Personal Information AusNet Services collects and holds about individuals seeking employment with AusNet Services includes the individual's name and contact information, the individual's curriculum vitae, and other information about the individual's suitability for employment with AusNet Services.

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- (g) AusNet Services' website (www.ausnetservices.com.au) contains a link to this Privacy Policy (or such other policy statement approved for that purpose).

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4 COLLECTION

Collection of Personal Information

- (a) AusNet Services collects Personal Information where the collection of such information is reasonably necessary for AusNet Services to perform one or more of its functions or activities as a diversified energy business.
- (b) AusNet Services endeavours to collect Personal Information from the individual to whom the information relates. In some circumstances, AusNet Services collects Personal Information from a third party such as an energy retailer or a health care provider (for example, where a customer is dependent upon a dialysis machine or another medical device and requires special energy supply arrangements). Where AusNet Services collects Personal Information from a third party, that information will be handled in accordance with this Privacy Policy.
- (c) AusNet Services only collects Personal Information by lawful and fair means. AusNet Services will not collect Personal Information secretly or in an underhanded or unreasonably intrusive way.

Notification

- (d) AusNet Services will take reasonable steps to notify individuals (including, but not limited to, its customers) or ensure awareness of the following matters before collecting any Personal Information directly from those individuals:
 - (1) AusNet Services' corporate identity contact details (if this is not obvious);
 - (2) the Primary Purpose and any Secondary Purposes for which AusNet Services is collecting the Personal Information;
 - (3) where applicable, any law that requires the Personal Information to be collected;
 - (4) the consequences (if any) for the individual if all or part of the Personal Information is not collected by AusNet Services;
 - (5) the organisations or types of organisations to which AusNet Services usually Discloses Personal Information (including any contractors or entities located overseas);
 - (6) that, in accordance with clause 11(a) of this Privacy Policy, an individual can seek access to and correction of the Personal Information that AusNet Services holds relating to that individual by contacting AusNet Services' Customer Contact Centre (even if they are not a customer);
 - (7) that an individual may contact AusNet Services' Customer Contact Centre (even if they are not a customer) if they have concerns about the way AusNet Services handles Personal Information.
- (e) Where it is not practicable for AusNet Services to notify an individual of the matters listed at paragraph (d) at the time of, or prior to, collecting Personal Information from that individual (including because AusNet Services collected the information from a third party), AusNet Services will take such reasonable steps (if any) to notify the individual of these matters as soon as possible after the Personal Information has been collected.
- (f) In some instances, AusNet Services will make an individual aware of the matters listed in paragraph (d) by referring an individual to, or providing to the individual, this Privacy Policy.

Sensitive Information

- (g) AusNet Services will not collect Sensitive Information about individuals except with their consent and only in circumstances where the information is reasonably necessary for AusNet Services to perform one or more of its functions or activities, or otherwise as required or authorised by law.

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Unsolicited Personal Information

- (h) AusNet Services may receive Unsolicited Personal Information about an individual, such as:
 - (1) correspondence to AusNet Services from members of the community, or other unsolicited correspondence;
 - (2) a petition sent to AusNet Services that contains names and contact information;
 - (3) an application for employment sent to AusNet Services other than in response to an advertised vacancy.
- (i) If AusNet Services receives Unsolicited Personal Information about an individual and determines that it could have collected that information under this Privacy Policy, AusNet Services will handle the Unsolicited Personal Information in accordance with this Privacy Policy.
- (j) If AusNet Services receives Unsolicited Personal Information about an individual and determines that it could not have collected that information under this Privacy Policy, and provided it is lawful and reasonable to do so, AusNet Services will, as soon as practicable, destroy or de-identify the Unsolicited Personal Information.

5 USE AND DISCLOSURE

Consent

- (a) AusNet Services will obtain an individual's consent to Use or Disclose Personal Information about that individual for a Secondary Purpose unless the Use or Disclosure is:
 - (1) for a purpose which the individual would reasonably expect and which is related and, in the case of Sensitive Information, directly related, to the Primary Purpose; or
 - (2) otherwise permitted by law.

Disclosure to related body corporate

- (b) Any company within the AusNet Services group may Disclose Personal Information about an individual to another company in the AusNet Services group. Where Personal Information is Disclosed by one AusNet Services company to another, the company receiving the information will only Use or Disclose that Personal Information for the Primary Purpose for which it was collected, or for a Secondary Purpose, and will be bound by this Privacy Policy in respect of that Personal Information.

Outsourcing to third parties

- (c) AusNet Services may allow third parties to Use Personal Information it holds, or may Disclose Personal Information to third parties, to enable functions to be outsourced (such as billing, customer communications or customer surveys) where:
 - (1) that Use or Disclosure would constitute a use or disclosure for a Secondary Purpose that the individual would reasonably expect; or
 - (2) the individual has consented to the Use or Disclosure.
- (d) AusNet Services will, where it is anticipated that Personal Information may be Used by or Disclosed to a third party, take reasonable steps to ensure that its contract with that third party includes a requirement that the third party complies with the Privacy Act.
- (e) Where the Disclosure is to a third party located overseas, clause 8 of this Privacy Policy applies.

Other permitted Uses or Disclosures

- (f) AusNet Services may Use or Disclose Personal Information for the purposes of law enforcement or internal investigations into suspected unlawful activities. If AusNet Services Uses or Discloses

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Personal Information for these purposes, AusNet Services will make a written note of that Use or Disclosure.

- (g) AusNet Services may Disclose Personal Information:
- (1) to law enforcement agencies, government agencies, courts or external advisers where permitted or required to by law;
 - (2) to lessen or avoid a serious threat to a person's life or health, or to public health or safety; or
 - (3) where otherwise permitted or required to by law.

6 METERING DATA

- (a) Metering data is Personal Information and AusNet Services will handle it in accordance with the Privacy Act.
- (b) AusNet Services Uses and Discloses 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 contain Personal Information.
- (c) A statement explaining in more detail how AusNet Services handles metering data is available on the AusNet Services website at www.ausnetservices.com.au.

7 MARKETING COMMUNICATIONS

- (a) AusNet Services may Use or Disclose Personal Information (other than Sensitive Information) to inform its customers about products, services and benefits it may offer from time to time.
- (b) At any time, an individual may request not to receive marketing communications from AusNet Services (or may request that marketing communications be limited to certain channels or certain products, services or benefits).
- (c) An individual wishing to make such a request may do so by:
- (1) following the "opt out" process explained in the marketing communication;
 - (2) contacting AusNet Services' Customer Contact Centre in accordance with clause 15 of this Privacy Policy;
 - (3) following such other process that is made available for this purpose from time to time.
- (d) AusNet Services will not Use or Disclose Sensitive Information for the purpose of marketing communications.

8 DISCLOSING PERSONAL INFORMATION OVERSEAS

- (a) AusNet Services will only Disclose Personal Information to overseas recipients for sound business reasons, such as to give effect to outsourcing arrangements (e.g. billing, customer communications or customer surveys).
- (b) AusNet Services requires any overseas organisation which receives Personal Information held by AusNet Services to enter into a contractual arrangement requiring the organisation to handle that information in accordance with:
- (1) a law or binding scheme in the overseas country that offers at least substantially similar privacy protections to the Privacy Act; or
 - (2) if no such law or scheme exists, the Privacy Act.

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- (c) AusNet Services may Disclose Personal Information in accordance with this clause to organisations located overseas, including organisations located in the Philippines, India, Singapore, Malaysia, Canada and the United States of America.

9 INFORMATION QUALITY

AusNet Services takes reasonable steps to periodically review its information collection and storage practices to ensure that Personal Information collected, Used or Disclosed by AusNet Services is accurate, up-to-date, complete and relevant.

10 INFORMATION SECURITY

- (a) AusNet Services stores Personal Information both electronically and in paper form.
- (b) AusNet Services takes reasonable steps to ensure its 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.
- (c) AusNet Services periodically reviews its information security practices to ascertain how Personal Information can be protected from misuse and loss, and from unauthorised access, modification and disclosure.
- (d) Unless the law requires otherwise, AusNet Services takes reasonable steps to destroy or permanently de-identify Personal Information if it is no longer required for a Primary Purpose or a Secondary Purpose.

11 ACCESS AND CORRECTION

- (a) AusNet Services will allow its records containing Personal Information to be accessed by the individual to whom the information relates, except where:
 - (1) providing access would pose a serious threat to the life, health or safety of any individual, or to public health or safety;
 - (2) the request is frivolous or vexatious in the reasonable opinion of AusNet Services;
 - (3) the information relates to existing or anticipated legal proceedings involving AusNet Services and would not be discoverable in those proceedings;
 - (4) clause 11(g) of this Privacy Policy applies; or
 - (5) AusNet Services is otherwise not required to do so.
- (b) Where an individual is able to establish, or AusNet Services is otherwise satisfied, that Personal Information held by AusNet Services is inaccurate, out of date, incomplete, irrelevant or misleading, AusNet Services will take reasonable steps to correct the individual's Personal Information.
- (c) Where AusNet Services corrects Personal Information about an individual that it previously disclosed to another entity (including a contractor), the individual may request AusNet Services to notify that entity of the correction. AusNet Services will take reasonable steps to make the notification unless it is impracticable or unlawful to do so.
- (d) An individual wishing to access and/or correct their Personal Information should do so by contacting AusNet Services' Customer Contact Centre or AusNet Services' Privacy Officer in accordance with clause 15 of this Privacy Policy.
- (e) AusNet Services will endeavour to respond to a request for access or correction within 30 days.
- (f) AusNet Services will not normally charge a fee for processing an access request unless the request is complex or resource intensive. AusNet Services may charge a \$50.00 administration fee if an individual requests access to their Personal Information more than once in any three month period.

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- (g) AusNet Services will not grant access or make corrections to its records containing Personal Information if prohibited from doing so by any law, regulation or court or tribunal order applicable to AusNet Services.
- (h) AusNet Services will give an individual:
 - (1) written notice of its decision to refuse to:
 - a. give that individual access to their Personal Information;
 - b. give access in the manner requested by the individual;
 - c. correct the individual's Personal Information;
 - (2) the reasons for its decision;
 - (3) information about how the individual can complain about the refusal.
- (i) If AusNet Services refuses a request to correct an individual's Personal Information, the individual may request AusNet Services to associate with the information a statement that the individual considers the information is inaccurate, out of date, incomplete, irrelevant or misleading.

12 ANONYMOUS TRANSACTIONS

AusNet Services will allow individuals to transact with it anonymously or using a pseudonym where reasonable and practicable, for example, where an individual is making a general enquiry and AusNet Services does not need to verify the individual's identity in order to respond to the enquiry.

13 COMPLAINTS

- (a) The AusNet Services Customer Contact Centre is the first point of contact for inquiries about privacy issues. Individuals wishing to make an inquiry or complaint regarding privacy should do so by contacting the Customer Contact Centre in accordance with clause 15 below.
- (b) AusNet Services will endeavour to respond to a complaint or enquiry within 30 days.

14 APPLICABLE LAWS

This Privacy Policy and all matters relating to AusNet Services' handling of Personal Information (including its collection, use, disclosure and storage of Personal Information and providing access to and correcting that information) are subject to the laws of Victoria.

15 CONTACTING AUSNET SERVICES

If an individual requires further information regarding the AusNet Services Privacy Policy, the individual may contact the AusNet Services Customer Contact Centre on 1300 360 795.

Alternatively, an individual 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

16 REVIEW

This Privacy Policy will be reviewed every two years.

17 SCHEDULE OF REVISIONS

Revision	Date	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	Privacy Policy approved by Managing Director
4	02/09/2014	Document rebranded from SP AusNet to AusNet Services
5	30/03/2016	Privacy Policy approved by Managing Director