



# Privacy Policy

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# 1 Introduction

We know that providing personal information is an act of trust and we take that very seriously. Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This Privacy Policy will tell you what we collect your data for and how we keep it safe for you. If you have any questions about this policy, please contact us.

We have appointed a data protection officer (DPO). If you have any questions about this privacy policy, please contact them using the details set out below.

This Policy also covers our requirements to have a **Credit Reporting Policy**, therefore this policy describes how we handle your personal information and credit-related information. Credit-related information is information about how you manage your credit, the credit that you have applied for or obtained, your payment history and creditworthiness and the information contained in your credit file.

When we collect this information, we follow the obligations set out in the Privacy Act 1988 (Cth) (**Privacy Act**) and Social Energy is bound by the Australian Privacy Principles (**Principles**). You can see the full text of the APPs online at <http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles>.

## 2 Our contact details

Social Energy Australia Pty Ltd, registered in Australia (ABN 613 510 042). Our Australian head office is at Level 13, 465 Victoria Ave, Chatswood, NSW, 2067.

## 3 Why do we have a Privacy Policy?

Most of the data we collect and hold about you is for the purpose of providing your energy. We also use data to make Social Energy's products and services better for our customers. We'll collect certain personal information from you when you use our website, when you get in touch with us about any of our products or services, and during any process to sign up, change or cancel your products and services.

The purpose of our privacy policy is to let you know:

- how and why we collect your personal information;
- how we use and disclose your personal information (and to whom);
- how we protect your personal information; and your legal rights and how the law protects you.
- Changes to our privacy policy

We keep our privacy policy under regular review. This version was last updated on the date listed in the footer of each page. If we make any changes to our privacy policy, we'll post changes on this page and, where appropriate, notified to you by email and when you next start the App or log onto one of the Services Sites. Where you use the App or the Service Site, the new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

We may also notify you in other ways from time to time about the processing of your personal information.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

## 4 Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## 5 When this Policy applies?

For the purposes of this Policy, "we", "us", "our" and "Social Energy" means Social Energy Australia Pty Ltd and other companies in the same group. Unless otherwise stated, Social Energy is the Data Controller for your personal data. This Policy applies to how we use your information in relation to our products and services generally.

This Policy doesn't apply to other companies' sites that you get to through our website or social media pages. So, make sure you've read their policy before putting your personal information on their site. Your continued use of our services will mean that you accept and agree to any changes to the Privacy Policy.

## 6 Your legal rights

### 6.1 Your rights to your data

If we collect or handle your personal data, you have rights as an individual which you can exercise in relation to the information we hold about you:

- 6.1.1 To correct or update your personal information, you can log into your Social Energy account via the App or website.
- 6.1.2 To delete your personal information, you can email us. We will make every effort to delete any information that we no longer need to hold, but we won't always be able to do this. For example, we may need to hold your information to continue to provide your energy under our contract. If this is the case, we'll explain why.
- 6.1.3 To ask us to restrict processing of your personal information or transfer your personal information to a different organisation, you can email us.
- 6.1.4 To request the transfer of your personal information to another party ("data portability").

- 6.1.5 To confirm how we are using your personal information or to access the personal information that we hold about you, in an easy to understand, portable and secure format, you can email us with the subject line "Access Request".
- 6.1.6 To object to the processing of your personal information, you can email us.
- 6.1.7 To withdraw consent to process your data, you can email us at any time.
- 6.1.8 To opt-out of marketing communications you can email us.
- 6.1.9 If you want to exercise any of these rights, please contact us. All emails should be directed to [aus.customerservice@social.energy](mailto:aus.customerservice@social.energy). Once we receive a request from you, we will respond within 4 weeks, but usually much faster than that. Before actioning these requests, we will need to positively identify you through our normal security and data protection checks. If you have any data protection complaints, you're able to contact the Australian Privacy Commissioner who can be found at the Office of the Australian Information Commissioner (OAIC) We'd like to try and help with any concerns you may have before you contact the OAIC, so please get in touch with us in the first instance.

The contact details for the Office of the Australian Information Commissioner's Office are as follows:

Street address: Level 3, 175 Pitt Street, Sydney NSW 2000

Telephone: 1300 363 992 (for the cost of a local call anywhere in Australia)

TTY: 133 677 followed by 1300 363 992

Post: GPO Box 5218, Sydney NSW 2001 Facsimile: +61 2 9284 9666

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Web: <http://www.oaic.gov.au/privacy/privacy-complaints/>

Further information about privacy and your rights can be obtained at the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

## 6.2 **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

# 7 Your personal information

## 7.1 **Collecting your personal information**

We (and/or our agents) will collect certain personal information from and about you during your sign-up journey, when you get in contact with us, use our website/App or Community and as part of providing our services to you. We may also monitor and record any communications we have with you, including phone calls, live chats and emails, to make sure we are providing you with the best service we can. It does not include data where the identity has been removed (anonymous data). The information we collect includes:

- 7.1.1 **Contact data;** your name, email address, postal address, phone number, date of birth and any other relevant information we need in order to contact or identify you;
- 7.1.2 **Financial data;** your bank account and payment details relating to products and services you receive from Social Energy;
- 7.1.3 **Technical data;** internet protocol (IP) address, your login data (including your App and Community username and password), browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We track technical data by using cookies (see 'Cookies' section below for more details);
- 7.1.4 **Usage data;** information about how you use our website, products and services;
- 7.1.5 **Marketing and communications data;** your communication preferences for receiving marketing from us and our third parties;
- 7.1.6 **Energy supply data;** your supply start date, meter technical details, tariff and if you have a smart meter installed at your property, we'll also capture your energy consumption data;
- 7.1.7 **Special categories of data;** concession data, if applicable.

We may also use aggregated data, in order to improve our operations and ensure we are providing you with the best service possible. All aggregated data is anonymised and doesn't reveal your identity.

It's important that the personal data we hold about you is up to date so please let us know if your personal data changes at any time.

## 7.2 Using your personal information

We use your personal information for a variety of purposes. The following sub sections highlight the main ways we use your personal information and the legal basis on which we rely.

- 7.2.1 **To supply you with energy** we gather information about you and your home so we can accurately supply your energy. For example, we need to know your address to supply the right property, and we need to know how much energy you use so we can send you accurate bills. Where necessary, we share this with other organisations in the energy industry, like your old supplier, Australian Energy Regulator (AER), Australian Energy Market Operator (AEMO) and the organisations that maintain the National Energy Market (NEM) databases. This will be for the legal basis of (i) performing a contract to which you are a party and (ii) for the legitimate interests of our business to provide services to you.
- 7.2.2 **To make Us better** we collect data on how you use our website, App and other features. We track things like where you click on our site and what features you use. This lets us learn what's working well and which features we need to improve. We sometimes share this data in an aggregated form (non-personalised) with agencies or partners that are helping us. For example, we might tell a telecommunications partner how many phone calls we get a week. This will be for the legal basis of the legitimate interests of improving the services we provide to you and to other customers.

7.2.3 **To personalise and promote Social Energy** we use your data to help us grow and spread the word on renewable energy. If you're with Social Energy, we share data with social media, search engine, and other advertising platforms so that we stop asking you to join us, and instead show you content more relevant to you. This will be for the legal basis of the legitimate interests of improving the services we provide to you and to other customers.

7.2.4 **To communicate with you** we will, in addition to sending you key information about your account by email, from time to time we'll also send you information about things we think will interest you. Where necessary, we share your data with organisations that send communications on our behalf. This will be for the legal basis of (i) performing a contract to which you are a party and (ii) for the legitimate interests of our business to provide services to you.

### 7.3 **Change of Purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### 7.4 **Automated decision making**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### 7.5 **Sharing your information**

We sometimes need to allow our service providers to process personal information we hold about you on our behalf for the reasons set out in this Policy or as otherwise required by law. We make sure that these third parties won't use your personal data for their own purposes and we only permit them to use it in accordance with our instructions and the law. This includes the following types of organisations:

7.5.1 **Trusted businesses or persons;** processing your information for us for the purposes set out above, based on our instructions and as set out in our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with bill generation, industry compliance and auditing, member support or payment processing.

7.5.2 **Energy industry partners;** including other suppliers, network operators and meter suppliers.

7.5.3 **Payment providers;** we work with payment providers to process your payments. For instance, we use Commonwealth Bank of Australia to process your direct debit payments. You can find more information on how these providers process your personal data and your data protection rights by looking at their privacy policies.

7.5.4 **Marketing agencies, search engines and social media networks;** to advertise Social Energy and to gather feedback on Social Energy such as through customer surveys.

7.5.5 **People you have authorised us to share data with;** such as family members, energy brokers, solicitors and debt management companies, so we can fulfil your requirements.

7.5.6 **Market regulators;** such as AEMO & AER and consumer protection organisations such as the Energy Ombudsman, where we are obliged to do so under regulations.

7.5.7 **Credit reference agencies;** we may tell credit reporting bodies how you're managing your account and whether you owe us money. These agencies can help us trace you if you have moved and we owe you money or you owe us money. The credit reporting bodies we use include:

Equifax Australia (formerly Veda)  
Website: [equifax.com.au](http://equifax.com.au)  
GPO Box 964, North Sydney NSW 2059  
Phone: 13 83 32

Illion (formerly Dun & Bradstreet)  
Website: [illion.com.au](http://illion.com.au)  
PO Box 7405, St Kilda Rd, Melbourne VIC 3004  
Phone: 13 23 33

Experian Australia  
Website: [experian.com.au](http://experian.com.au)  
GPO Box 1969, North Sydney NSW 2060  
Phone: 1300 783 684

CreditorWatch  
Website: [creditorwatch.com.au](http://creditorwatch.com.au)  
GPO Box 276, Sydney NSW 2001  
Phone: 1300 501 312

You can contact those credit-reporting bodies or visit their websites to see their policies on the management of credit-related information, including details of how to access your credit-related information they hold. You have the right to request credit reporting bodies not to:

- use your credit-related information to determine your eligibility to receive direct marketing from credit providers; and
- use or disclose your credit-related information, if you have been or are likely to be a victim of fraud.

7.5.8 **Aggregated (non-personalised) data;** with agencies that help us with advertising. For example, we might share with an agency how many of our members live in South Australia.

7.5.9 **Centerlink and other government agencies;** to verify, process and pay any concessions and discounts you apply for.

When you share your own information sometimes you may share your information publicly, such as by posting in our community or on social media sites. Remember, when you share information publicly it may become accessible through search engines.

## 7.6 **Disclosing your personal information**

It's important that you understand what we'll do with the data that we hold about you, as well as the lawful reasons we can do this. We may sometimes combine information that we collect from you with information we obtain about you from third parties and affiliates



and information derived from any other subscription, product, or service we may provide. We use the information we hold about you for the following purposes:

- 7.6.1 **Performing our contract with you** means that we need to process information in order to supply your energy and the services you've asked for under our contract. For example, we may use your information (such as your contact information) to organise your switch to Social Energy, to take monthly payments and organise meter repair jobs.
- 7.6.2 **Fulfilling our legal and regulatory obligations** means that many of the ways we manage your energy are based on requirements set out in our Supplier Licence Conditions and by AER Codes of Practice, such as how we set out your annual statement and how we deal with disputes. We may also need to comply with court orders and disclose information to law enforcement agencies where we are obliged to do so.
- 7.6.3 **Adding you to our Concession Register with your consent** when you have let us know that you are entitled to a concession of some kind, means that we will ask for your explicit consent before we add your details to our Concession Register.
- 7.6.4 **Taking smart meter readings with your consent** means that we'll normally collect readings up to every half hour to ensure we optimise your energy and trading potential.
- 7.6.5 **Analysing your smart meter readings to offer you new products and services** with your consent, for example, with a smart meter, we could use your meter readings to understand how you use your energy, so we could build and offer you new products and services relevant to your needs.
- 7.6.6 **For our legitimate business interests**, where your information is necessary for us to build our business and provide our services to you. We consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. Our legitimate interests include maintaining and improving our services for example, we may use information that we obtain through your emails and calls to train our team. We may also use your information to ensure that our services are working as intended – for example, understanding which parts of the website are easiest to use. We may also contact you for suggestions on how we can improve the way we provide our services to you.
- 7.6.7 **Providing personalised messages** to make sure messages are relevant to you, we may let advertising platforms like Facebook and Google know that you are a member of Social Energy by sharing your contact details with them. This means we can stop asking you to join Social Energy once you're with us, and instead share information with you that we think you might be interested in.
- 7.6.8 **Communicating with you about our services** we may contact you about Social Energy news, updates and new products or services that we think might be of interest. We may also contact you to provide you with offers, competitions, marketing materials and other promotional materials, both online and through other marketing channels, such as third-party social networks, like Facebook.

7.6.9 **Measuring our performance and developing new services**, for example, we use data to understand how our services are used. We also use aggregated data to understand our members and their energy usage better. We also use data to help to prevent and detect fraud or debt and recover unpaid bills.

## 7.7 **Protecting your personal information**

It's all about keeping your information secure. Whilst we cannot guarantee that unauthorised access to or unauthorised alteration, disclosure or loss of information will never occur, we work hard to prevent it. In particular:

7.7.1 We use encryption to keep your data private while in transit.

7.7.2 Your account information is protected for your privacy and security. This is either through a password you have chosen, or your personal and validated email address. Social Energy and our agents will never ask for your password.

7.7.3 We review our practices for collecting, processing and storing personal information, including physical security measures to guard against unauthorised access to systems and backups to prevent the loss of information. We will continue to enhance our security procedures as new technology becomes available.

7.7.4 We restrict access to personal information wherever possible to people who need to know that information to process it and who are subject to contractual confidentiality requirements.

7.7.5 You can also help to keep your account and your personal information secure, you should not disclose your password details to anyone. You should make sure your Social Energy account password is different from your email address password and we recommend you change your passwords from time to time.

## 7.8 **Sources of the Personal Data**

We receive personal data directly from you. In some cases, this will be via the devices installed at your premises.

## 7.9 **Sending your data outside the Australia**

Sometimes our agents and service providers may be based outside Australia, so when working with them, we may pass your information to countries that do not have the same data protection standards as Australia. If we do this, we will ensure that any information is protected in line with this Privacy Policy.

## 7.10 **How long will we keep your personal information?**

We keep the personal information we collect for no longer than is necessary for the purposes for which we collected it. The length of time depends on the purposes for which we use it, or otherwise to meet our legal obligations. We will delete any information as soon as we no longer have a valid reason to hold it. If this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 8 Cookies

Cookies are small text files generated by the website you're viewing. They allow the website to store information as you browse. Web cookies contain data that can be used to make your browsing experience better. Cookies are safe for your computer. They only store information used by your browser. They can't access any other content on your computer, nor do they create malware or viruses.

### 8.1 How and why we use cookies?

We use cookies to remember you. They're needed to allow our website and App to function properly, and we also use them to improve your online experience and to help us deliver personalised messages to you. By using our website, we're assuming you're happy with our use of cookies, and you are providing your consent to us storing and using cookies in accordance with this policy.

Here are the key ways we use cookies and the third parties we allow to place cookies. We've included some examples below:

- 8.1.1 **Logging in** cookies remember that you're logged in to your Social Energy Account.
- 8.1.2 **Preferences** cookies remember your preferences such as the language you use
- 8.1.3 **Website optimisation** we may use tools to test different web designs by showing you a version of our website that is different to everyone else's, so we can see which is best.
- 8.1.4 **Chat** to allow you to continue the same chat conversation even if you come back later.
- 8.1.5 **Web Analytics** we use programs like Google Analytics to help us find out how many people visit our websites, where they came from, what devices they used, which pages they visited, and what information they are searching for.
- 8.1.6 **Help articles** we use Zendesk to help us to analyse what our members are searching for in FAQs, and whether the articles we have are useful.
- 8.1.7 **Web sessions recording tools** allow us to view your web session in real-time. By replaying your journey through our website, it helps us see the website through your eyes and helps our tech team find and fix errors and improve the usability of the website.

### 8.2 How can you manage cookies and where can you find more information?

Most browsers enable cookies by default, but you can delete or block cookies in your browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). You can also get in touch with some of the third parties we work with to adjust your cookie settings. Many websites offer helpful information about how you can delete or block cookies in different browsers. Blocking cookies will mean that parts of our website, and other websites you visit, may no longer function properly.