



# Privacy Policy

(Residential and Small Business Customers)

## **Huddle Connect Pty Ltd**

A.C.N 690 489 626

A.B.N 91 690 489 626

### **How to contact us:**

**Phone** 1300 755 492

**Email** [support@huddleconnect.com.au](mailto:support@huddleconnect.com.au)

**Website** [www.huddleconnect.com.au](http://www.huddleconnect.com.au)

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## Privacy Policy

This statement is our privacy policy – which sets out how we manage your personal information and other information. Before we go into the details, we need to define a few terms.

### Your Information

When we refer to “Your Information”, we’re referring to both your personal information, as defined under the *Privacy Act 1988* (Cth) (“Privacy Act”), and customer information, which is protected by Part 13 of the *Telecommunications Act 1997* (Cth) (“Telecommunications Act”).

### Credit Reporting Policy

This sets out how we manage your ‘credit information’ and ‘credit eligibility information’ where this is relevant to you and is our credit reporting policy for the purposes of Part IIIA of the Privacy Act.

We may collect information about you from and disclose your personal information to organisations whose business involves handling personal information in order to provide another entity with information about the credit worthiness of an individual (Credit Reporting Bodies) in connection with your application for Services, or other dealings with us.

Those Credit Reporting Bodies may then include that information in reports that they provide to other credit providers to assist in assessing your credit worthiness. For example, if you fail to meet your payment obligations to us, or if you commit a serious credit infringement in relation to credit for our Services, we may be entitled to disclose this information to Credit Reporting Bodies. We may collect information about your credit worthiness or to establish your eligibility for consumer credit from a Credit Reporting Body.

We hold credit and credit eligibility information in the same manner that we hold personal information.

The types of credit and credit eligibility information that we may collect, maintain or disclose includes:

- information about your identity;
- information requests to credit reporting bodies;
- credit applications and arrangements;
- details about default listings, overdue payments or serious credit infringements, and subsequent payments or arrangements;
- bankruptcy or credit related court proceedings and other publicly available information; and
- credit scores, risk assessments and credit worthiness

We may use or disclose information about your credit to:

- process applications and manage credit;
- develop our credit rating systems;
- assist you to avoid default and to assess or manage a financial hardship application;
- collect debts from you;
- deal with serious credit infringements;
- deal with complaints;
- deal with regulatory matters, court orders and when required or authorised by law;
- assign debts; and
- adhere to our credit reporting obligations.

You have a right to make a request to Credit Reporting Bodies to not use credit reporting information about you for pre-screening of direct marketing by a credit provider. You can also request Credit Reporting Bodies to not use or disclose credit reporting information about you if you have reason to believe you are a victim of fraud.

The Credit Reporting Body that we use is:

Equifax Australian Group Pty Ltd

Telephone: 138 332

Address: Equifax Australian Group Pty Ltd, PO Box 964 North Sydney NSW 2059

Email: [membership.query@veda.com.au](mailto:membership.query@veda.com.au)

Website: [www.mycreditfile.com.au](http://www.mycreditfile.com.au)

A Credit Reporting Body is required to have a policy which explains how they will manage your credit related personal information. You can view the credit policy for Equifax at [www.equifax.com.au/credit-reporting-policy](http://www.equifax.com.au/credit-reporting-policy) provided at their website above.

## The kinds of information we collect and hold

Depending on the particular circumstances, we might collect and hold a range of different information about you. This can include your name, date of birth, contact details (including address, email address, telephone number or mobile telephone number), occupation, driver's license number, username or password, financial information (such as credit card or bank account numbers) and information about how you use our products and services.

We may occasionally need to collect additional information though – for example, as part of a user authentication process when you want to speak to one of our customer service personnel who need to access your account.

You might also need to provide personal information about other individuals to us (e.g. your authorised representatives). If this is the case, we rely on you to inform those individuals that you're providing their personal information to us – and to let them know about this statement.

Calls into and out of our offices are recorded and transcribed for quality, monitoring and coaching purposes. You may request a copy of your recording by nominating the date and time of your call to our Customer Service team.

## How we collect Your Information

We might collect Your Information in a number of ways, including:

- Directly from you (such as where you provide information to us when you visit one of our stores or websites, complete an application form or agreement for one of our services, or contact us with a query or request).
- From third parties like our related entities, business partners, credit reporting bodies (see our Credit Reporting Policy below), wholesale or other customers, or your representatives.
- From publicly available sources of information.
- From our records of how you use your products or services.
- When legally authorised or required to do so.
- From third parties we list in the section of this statement with the heading "When we disclose Your Information".

If you choose not to provide certain information about you, we mightn't be able to provide you with the products or services you need, or the standard of service we set ourselves to deliver.

## How we hold Your Information

We may store Your Information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We take all reasonable steps to maintain the security of Your Information and to protect it from unauthorised disclosures.

While we take these steps to maintain the security of Your Information, you should be aware of the many information security risks that exist today – and take appropriate care to help us keep Your Information safe.

We may also collect personal information about you in accordance with the obligations under the data retention provisions of the *Telecommunications (Interception and Access) Act 1979* (Cth).

## How we use Your Information

We might use Your Information for a range of different purposes, including:

- To verify your identity, or to carry out appropriate checks for creditworthiness and for fraud checking.
- To provide you with products and services or information about these products and services, to help with any enquiries or purchases, to enhance your experience on our network, or to give you better customer service.
- To administer and manage the products and services we provide to you, to charge and bill you for them and to collect any amounts you may owe us.
- To monitor network use, quality and performance – and to operate, maintain and develop, test and upgrade our systems and infrastructure.
- As authorised or required by the Telecommunications Act and other laws applicable to us.

## How we use Your Information for Direct Marketing

If you Opt-in, we might also use Your Information so that we, our related entities, dealers and other business partners can promote and market products, services and special offers that we think you'll be interested in (which may include products, services and offers provided by a third party). This marketing might be carried out in a variety of ways (including by email, SMS/MMS, or social media or by customising on-line content and displaying advertising on websites) and could continue after you finish using any products or services from us.

## When we disclose Your Information

We may disclose Your Information to third parties who provide services to us – including organisations and contractors that assist us with the purposes for which we use Your Information.

These include:

- Customer enquiries.
- Installation, maintenance and repair services.
- Mailing operations, billing and debt-recovery functions.
- Information technology and network services.
- Market research, marketing, telemarketing and door-knocking services.

## We may also disclose Your Information

We may disclose Your Information:

- To your authorised representatives or advisers, or when you ask us to do so.
- To credit reporting bodies and fraud checking agencies, and to credit providers for credit related purposes – including creditworthiness, credit rating, credit provision and financing.
- To our dealers, our related entities or our business partners.
- To other telecommunication and information service providers or to our wholesale or other customers from or through whom you may acquire products or services (for example, we may need to disclose Your Information for billing purposes).

- To the manager of the Integrated Public Number Database (“IPND”), and other organisations as required or authorised by law (please see [www.acma.gov.au](http://www.acma.gov.au) for more information).
- To law enforcement and national security agencies, and other government and regulatory authorities as required or authorised by law.
- To third parties as required by or in accordance with any industry code or industry standard registered under the Telecommunications Act.
- To government agencies for purposes associated with connecting new services to the National Broadband Network.
- To third parties who assist us with managing or developing our business or corporate strategies and functions – including our corporate risk and funding functions.
- nbn™ may ask us to verify your details. If you are an existing customer we may provide a copy of your bill for the purposes of verification.
- As part of a transfer/sale of all or part of our assets or business.

## **How to access or correct your personal information or make a privacy complaint**

If you’d like to access any of your personal information including credit eligibility information that we hold, or want to correct any errors in that information, please get in touch – so that we can look into your request. There is no charge to submit a request or correct your information.

You can also use these contact details to let us know if you have a privacy complaint against us – for instance, if you think that we’ve failed to comply with the Australian Privacy Principles (“APP”) or any binding APP code that has been registered under the Privacy Act. We’re committed to acknowledging your complaint in a prompt manner – and will give you an estimated timeframe for when we’ll be able to respond to you.

We’ll always do our best to resolve any complaints without needing to have a third party involved, but you can also choose to lodge a complaint with a relevant regulator – like the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) or the Telecommunications Industry Ombudsman ([www.tio.com.au](http://www.tio.com.au)).

## **About this Statement**

This statement is effective as at 1<sup>st</sup> July 2024. From time to time we may need to change this statement – and if we do so, we’ll post the updated version on our website. It’ll apply to all of Your Information held by us at the time.