

LPE Privacy Policy

1. About us

LPE provides energy products and services. This policy describes how LPE handles your personal information and credit-related information.

2. Your privacy is important to us

We keep your information safe. We aim to be clear and open about what we do with it.

We understand that your privacy is important to you, and we value your trust. That is why we protect your information and aim to be clear and open about what we do with it.

Personal Information has the meaning given in the Privacy Act 1988 (Cth) (Privacy Act) and includes information that identifies you or can be reasonably linked to your identity.

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 and the Privacy (Credit Reporting) Code 2014.

We update our privacy policy when our practices change. You can always find the most up-to-date version on our <u>website</u>.

3. What information do we collect?

We collect information about you when you interact with us. We may also collect information about you from other people and organisations.

We only collect your personal information when LPE needs it to provide our products and services or to comply with the law. The kinds of information that we collect depends on how you interact with us. Here are some examples.

3.1 Information we collect from you:

We collect the name and contact details (landline, mobile, email address) of LPE customers and their authorised representatives as well as shareholders, business contacts, job applicants, contractors, and others. We may also collect:

• If you are a customer: Your date of birth, address (supply and mailing if different), address history (where relevant), concession details (where applicable), other forms of identification (such as driver's licence or passport), payment details, ABN (if applicable) and information about your property that you tell us. We also collect information about your use of our energy



products and services including energy usage and consumption information. For example, how much energy you use and when you use it.

- If you are an authorised representative on another person's account: First name, last name, date of birth, telephone number, address, and the relationship with our customer.
- If you are a shareholder: Your tax file number if you provide it.
- If you apply for a job with us: Information that you provide about your right to work, employment history, qualifications, and ability.

We collect information when you interact with us using the channels we make available to you – online, direct contact with our customer care centre and social media.

If you give us personal information about other people, we will assume that they have agreed that you can do this.

3.2 Information we collect from others:

- When you get a quote to apply to open an account with us: Your credit history information.
- We collect credit-related information from credit reporting bodies about you: When you set
 up an account with us or when your account is in default. This information can be found on your
 credit file, including the fact that you have applied for credit, the amount and type of credit,
 details of your current and previous credit providers, start and end dates of credit
 arrangements, and information about listings on your credit file including defaults and court
 judgments.
- When you use our website and social media: Your IP address, device identifiers and information about how you use our websites such as session information and login attempts. We use web analytics services to do this. These services include Google Analytics.
- When you participate in market research: Information about you and your responses from the service provider that conducted the research.
- When you engage with our sales representatives: Your name, address and contact details, so we can contact you about products you may be interested in.
- **If you are a shareholder:** To comply with the *Corporations Act 2001 (Cth)* (Corporations Act) we collect and disclose shareholders' personal information to maintain our share registry.
- If you apply for a job with us: Professional background, qualifications and memberships, and references from your former employers. Where it is relevant to the role, we may also collect screening check information (such as background, medical, drugs and alcohol, criminal records, bankruptcy, directorship, and company checks), and abilities testing, including psychometric testing.

3.3 Sensitive information

The Privacy Act protects your sensitive information, such as information about your health or ethnicity. Where we need this information for your account (for example, to ensure continuous service to your property or to assist with translation services), we will ask for your permission — except where



otherwise allowed by law.

4. How do we use your information?

We use your information to deliver our products and services, manage our business and comply with the law. We also use your information for other reasons, such as to better understand you and your needs.

We collect and use your information, so we can:

- Confirm your identity,
- Provide you with the products and services that you have asked for, including customer support,
- Handle payments and refunds,
- Communicate with you about your account,
- Manage your credit arrangements with us,
- Manage accounts that are overdue, including where we sell debt,
- Participate in credit reporting systems,
- Respond to applications, questions, requests, or complaints that you have made to us,
- Maintain and update our records and carry out other administrative tasks,
- Research the usage of, and to develop and improve the capabilities of, our services,
- Improve customer experience and do market research,
- Manage your shareholding (if you are a shareholder),
- Assess your employment application (if you have applied to work with us),
- Investigate possible fraud and illegal activity,
- Comply with laws, including assisting government agencies and law enforcement investigations, and
- Manage our business and assets.

If we do not have your personal information, we may not be able to do these things. For example, we may not be able to deliver the products or services you have asked for or respond to your questions.

4.1 Direct marketing

We may also use your personal information to tell you about products or services that we think you might be interested in. We may send you marketing messages in various ways, including by mail, email, telephone, SMS, and digital marketing including advertising through our website, social media or third-party websites.

If you tell us how you would prefer to be contacted, we will contact you in that way where we can.

If you do not want to receive direct marketing messages, you can opt out by:



- Filling out a <u>Do Not Contact form</u> on our website,
- Contacting our Customer Care Team (call 1800 040 168), or
- Following the instructions in any marketing communication you receive from us (for example, using the 'unsubscribe' link in an email or responding to an SMS as instructed).

Please note that we may still send you important administrative and safety messages even if you opt out of receiving marketing communications.

4.2 The way we use data

We are always working to develop and improve our products and services and improve our processes to ensure that they and we better meet your needs.

New technologies let us combine information we have about our customers and users with data from other sources, such as third-party websites or the Australian Bureau of Statistics.

We also collect information about people that does not identify them such as website and advertising analytics, and data from service providers.

We analyse this data to help us learn more about our customers and improve our products and services.

Where we work with partners or service providers to do this, we do not pass on personal information about you.

5. Who do we share your information with?

We share your information for the purposes set out in <u>section 4</u> with our service providers, and to comply with the law. When we do this, we take steps to keep your information safe.

We share your personal information with other people and companies where we need to for the purposes set out in <u>section 4</u>. This includes sharing:

- With our installation, maintenance and fulfilment partners and other third-party service providers (including marketing and analytics companies), so they can make installations and maintain products and services that we offer,
- With other energy companies and other companies (like those that own or operate poles and wires) that help us deliver our products and services, or to migrate your service if you change energy providers,
- With our wholesalers and other agents from whom you may acquire our services,
- With credit reporting agencies to process new applications, assess and manage applications for credit, manage overdue accounts, and review your creditworthiness,
- With insurance investigators,
- With companies that assist us with providing electric vehicle and distributed energy products and services, so that you can use these products and services,
- With people that you have asked us to give your information to, such as your authorised



representatives or legal advisors,

- If you have applied to work with us, with your previous employers to confirm your work history,
 and
- To comply with laws and assist government agencies and law enforcement.

We also share personal information with people and organisations that help us with our business, such as professional advisors, IT support, and corporate and administrative services including mercantile agents (including debt collectors) and debt buyers. We only do this where it is needed for those services to be provided to us. When we do this, we take steps that require our service providers to protect your information.

6. Keeping your information safe

We train our staff in how to keep your information safe and secure. We use secure systems and environments to hold your information. We only keep your information for as long as we need it.

7. Accessing, updating, and correcting your information

You can ask to see a copy of the personal information or credit-related information that we hold about you or ask us to update or correct it.

7.1 How can you contact us?

See section 9 for details on how you can contact us.

7.2 How long will it take?

We try to make your information available within 30 days after you ask us for it. If it takes longer, we will let you know.

7.3 Can we refuse to give you access?

In some cases, we can refuse access or only give you access to certain information. For example, we are not able to let you see information that is commercially sensitive. If we do this, we will write to you explaining our decision.

7.4 Can you correct or update your information?

You can ask us to correct or update any of your personal information or credit-related information that we have. If we have given the information to another party, you can ask us to let them know it is incorrect.

If we do not think the information needs to be corrected, we will let you know why. You can ask us to include a statement that says you believe our record about you is inaccurate, incomplete, misleading, or out of date.



8. Making a privacy complaint

8.1 How can you make a privacy complaint?

If you are concerned about your privacy or how we have handled your personal information, you can make a complaint and we will try to resolve the issue. See section 9 for details on how you can contact us. If you are not satisfied with how, we have handled your complaint, you can contact your local Ombudsman or the Australian Privacy Commissioner (details in section 8.3).

You can read more about how we handle complaints on the <u>Complaints Resolution page</u> on our website.

8.2 How do we manage privacy complaints?

We will:

- Keep a record of your complaint, and
- Respond to you about your complaint and let you know how we will try to resolve it and how long that may take.

8.3 What else can you do?

If you're not satisfied with how we have managed your privacy complaint, you can contact your local Ombudsman at any time for advice or to make a complaint. The Ombudsman is independent, and their services are free.

Energy and Water Ombudsman QLD	Energy and Water Ombudsman NSW
Mail: PO 3640, South Brisbane BC, QLD 4101	Mail: Reply Paid 86550, Sydney South NSW 1234
Phone: 1800 662 837 Fax: (07) 3087 9477	Phone: 1800 246 545 Fax: 1800 812 291
Email: complaints@ewoq.com.au or	Email: complaints@ewon.com.au
info@ewoq.com.au	
Web: www.ewoq.com.au	Web: www.ewon.com.au

You can also contact the Australian Privacy Commissioner who can be found at the Office of the Australian Information Commissioner (OAIC).

Office of the Australian Information Commissioner	
Mail: PO Box 5218, Sydney, NSW 2001	
Phone: 1300 363 992	
Email: enquiries@oaic.gov.au	
Web: www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint	



9. Contact us

To ask us a question, access your personal information, request a correction to your personal information, make a complaint, or get a printed copy of this policy you can contact our customer care team at 1800 040 168 or privacy@localityenergy.com.au.