



**SAVANT ENERGY POWER NETWORKS
PRIVACY POLICY
1 JULY 2015**

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Introduction

The protection of your personal information is something that Savant Energy Power Networks Pty Ltd (SEPN) takes very seriously. This Policy describes how we manage your personal information in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) ("Privacy Act"). This Policy represents our policy as at July 2015. From time to time and for any reason we may revise this Policy and our information handling practices. This document will be updated to reflect any changes made and we will publish the revised policy on our website.

Personal information - what information we collect

We primarily collect and hold personal information about you to enable us to provide energy and related services to you, inform you of different product offerings and in order to comply with our legal and regulatory obligations. The kinds of personal information that we collect and hold includes:

- name;
- date of birth;
- address (mailing and supply address);
- telephone and/or mobile number;
- driver's licence details;
- email address (if provided);
- concession details (if applicable);
- bank account or credit card details; and
- credit or repayment history information.

We may also hold personal information that you provide to us about other individuals residing at the service address e.g. your spouse, partner or co-tenant. We rely on you to inform those individuals that their personal information is being provided to us and that they may contact us for further information.

In addition, we also collect and hold information relating to the supply of energy to your supply address including information about your energy consumption, connection and interruptions.

Under the Privacy Act, "sensitive information" includes but is not limited to information or an opinion about an individual's racial or ethnic origin, religious belief, or criminal record and also includes health information about an individual. Generally, we do not collect or hold sensitive information about you. However, in certain circumstances and provided we have obtained your consent or where it is required or authorised by or under an Australian law or court/tribunal order, we may collect and hold health information about you or someone living at your supply address as it relates to providing energy or related services to your supply address. For example, that you or a person residing at your supply address is dependent on life support equipment.

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How we collect personal information

We collect personal information in the following ways:

- accepting an offer and/or entering into a contract with us for the supply of energy;
- advanced metering infrastructure (for example smart meter data);
- the operation of our telephone customer contact centre (these calls are recorded and monitored for training, verification and compliance purposes);
- customer survey or market research activities;
- the marketing of our energy products and services;
- your enquiries; and
- our website (including information you enter onto our website). Please see the "Collection of personal information through website activity" for more information.

We may also collect personal information about you from third parties such as electricity distributors, Credit Reporting Bodies (as the term is defined in our Credit Policy), market data research firms, your representatives (e.g spouse or co-tenant) and contractors providing metering and payment / billing services.

We may obtain Credit Reporting Information about you from a Credit Reporting Body (as those terms are defined in our Credit Policy). We use this information to assess your creditworthiness and assist us in making responsible credit decisions. For further details refer to our Credit Policy which is available on our website.

We typically hold the personal information we collect on electronic databases.

Collection of personal information through website activity

We collect the personal information that you enter onto our website (including when you register your user id, when you access your account online, use our enquiry form, sign up for our newsletter or enter a competition on our website). We may also collect non-personally identifiable information (such as your user name, if it is not your actual name, and browser details) or in some circumstances personal information about you when you interact with us online (including when you visit an SEPN hosted web page) or when you mention the brand name "Savant Energy" or our products via external social media platforms (e.g. Facebook or Twitter). Any personal information that we may collect from social media platforms is determined by the privacy settings of your account within the social media platform (that is, the extent to which your personal information is publicly available on the social media platform) and the content of your post.

Our website includes pages that use Cookies which are small amounts of data sent by our website and other third parties and stored on your computer's hard drive. This allows our servers to recognise your computer when you visit our website in the future. Cookies do not identify you as an individual although they do identify your browser type, the operating system you are using, the web page you visited, your internet service provider and your State location. Savant Energy's website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics also uses Cookies to help the website analyse how users use the site. The information generated by the Cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this

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information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. No personal information is collected or transmitted to Google. By using Savant Energy's website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

You can configure your internet browser to accept all Cookies, reject all Cookies or notify you when a Cookie is sent. If you refuse the use of Cookies in this way you may not be able to see the full functionality of Savant Energy's website. Please refer to your internet browser's instructions or help screens to learn more about these functions.

To assess the effectiveness of our website design and layout, as well as monitor traffic to the website we may contract with third parties to collect statistical data. However no personal information is collected during this process.

How we use personal information

We collect, hold and use your personal information for our normal business operations and activities, including:

- communicating with you;
- verifying your identity and supply address;
- contracting with you for the sale of energy;
- administering and managing the sale of energy to you including to obtain and provide meter services, issue bills and provide billing services, receive payments and collect debts;
- facilitating responses to your enquiries or complaints;
- conducting credit checks;
- conducting debt recovery activities (including through a mercantile agency);
- conducting customer surveys;
- gathering and aggregating information for statistical and modeling purposes, including customer segmentation processes;
- in assessing performance and compliance with our regulatory obligations through independent audits; and
- reporting to regulatory authorities and government bodies on regulatory compliance and performance obligations.

After using reasonable efforts to recover outstanding amounts owed by you to us, if there are still outstanding amounts owing, we may disclose relevant personal information and Credit Information to a Credit Reporting Body (as those terms are defined in our Credit Policy). For further details refer to our Credit Policy which is available on our website.

We also use your personal information to provide you with information on products, services that we, or third parties offer, offers, competitions and other marketing information that we consider may be relevant to you or that you might be interested in, even after you cease acquiring products or services from us. You can tell us if you do not want to receive such information by contacting us on 08 8125 9607.

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When we disclose personal information

We may disclose your personal information to third parties that help us provide services to you as our customer. We take reasonable measures to ensure that the organisations that we disclose personal information to are bound by confidentiality and privacy obligations in relation to the personal information. Third parties that we may disclose your personal information to include:

- additional account holders or your authorized representative;
- SEPN contractors, suppliers and agents who assist SEPN in providing products and services to you (e.g. Skilltech who provides meter reading services);
- the operator of the network through which energy is supplied to you;
- financial institutions for payment processing and billing activities;
- credit providers and agencies;
- other organisations who in conjunction with us provide the services;
- Savant Energy's related bodies corporate;
- Government agencies, regulatory authorities or enforcement bodies (e.g. Australian Federal Police) where required or authorised by law;
- our professional advisers including independent auditors we engage to ensure the integrity of our operations; and
- debt recovery agencies.

Cross-border disclosure of personal information

Generally speaking, SEPN does not disclose or transmit any of your personal information to recipients outside Australia. However, in limited circumstances your personal information may be disclosed by us to third parties located in Philippines for the purpose of assistance with customer services only.

How we hold and keep secure personal information

We are committed to keeping secure the personal information you provide to us. We take precautions to protect the personal information we hold about you from misuse, loss, interference, theft and from unauthorised access, modification or disclosure.

Our security measures include, but are not limited to:

- educating our employees about their obligations with regard to your personal information;
- ensuring our employees and outsourced service providers use passwords when accessing our systems;
- using secure networks or encryption when transmitting electronic customer data;
- storing personal information in secure, encrypted data centres;
- requiring any third parties engaged to provide appropriate assurances to handle your personal information in a manner consistent with the Privacy Act; and
- compliance with payment card industry security standards with respect to the storage and transmission of payment card details.

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How we handle requests for access to personal information

You can request, access to details of the personal information that we hold about you at any time which we will provide to you free of charge, by contacting:

Postal Address: Savant Energy Power Networks Pty Ltd
PO Box 110
Walkerville SA 5081
Email: admin@sepn.com.au
Phone: 08 8125 9607

We will respond to any such request for access as soon as reasonably practicable and in any event will acknowledge receipt within three business days of receiving your request. We may require you to set out the request in writing. Wherever possible and practicable, we will provide with you a copy or details of your personal information in the manner requested. Otherwise, we will work with you to find a mutually agreed alternative. If, after exploring all options, we cannot provide you with access to the information in the form requested, we will provide a written statement setting out our reasons for refusal.

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete, up to date and relevant. If we determine that information we hold about you is no longer required, we ensure it is destroyed.

We may not be able to provide you with the services you are seeking if you provide incomplete or inaccurate information. If you believe the personal information we hold about you is inaccurate, incomplete or outdated, please contact us using the details listed above so that we can correct it.

Privacy complaints

Should you have a privacy complaint or want to report a breach by SEPN of the Australian Privacy Principles, we encourage you to inform us so that we can have the opportunity to remedy the issue and find a solution. You can do this by contacting:

Postal Address: Savant Energy Power Networks Pty Ltd
PO Box 110
Walkerville SA 5081
Attention: Privacy Officer
Email: privacy@sepn.com.au
Phone: 08 8125 9607

We will aim to resolve your complaint within five business days from when we receive your complaint. There may be times when we need a bit longer to investigate the complaint and respond to you but we will contact you within five business days to give you an update and let you know when we think we'll find the answer or solution. We will also confirm how frequently you would like to be updated moving forward.

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If you would like to know more about our complaint handling procedures, please see our Standard Complaints and Dispute Resolution Procedures on our website at www.sepn.com.au.

If you are unsatisfied with the handling of your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner ("Oaic"). For more information about making a complaint to Oaic, visit <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.