

01 August 2020

At AlphaCall, we are committed to maintain the security of the personal information held by us. This Privacy Policy describes how we look after the personal information we obtain or you provide us with when you use our Website and when you sign-up for our products and services.

1. **Your Privacy**

We take a reasonable degree of care to ensure that your Personal Information is accurate, complete, up-to-date and stored in a secure environment, protected from unauthorised access, modification or disclosure.

2. **Why AlphaCall collects your personal information**

We collect your information only when it is reasonably necessary for the purposes of providing you services and products.

Some examples of this include:

- (a) To verify who you are (your identity),
- (b) To process your application for a service,
- (c) To best answer your questions or concerns,
- (d) To manage your services when you are with us,
- (e) To carry out checks for credit-worthiness or fraud,
- (f) To see if we can supply you a service in the first place,
- (g) To understand how we can best serve you on an ongoing basis,
- (h) To ensure we let you know in an appropriate manner about what we can offer you in the future,
- (i) To best manage our own business, and
- (j) To comply with all our legal and regulatory obligations

In order for us to do this, AlphaCall collects and holds personal information about prospective customers who have expressed an interest in learning more about, or obtaining our products and service; current customers who hold our services and products; and past customers who have had an AlphaCall service or product but do not currently have an active AlphaCall account.

3. **The type of personal information we collect**

The type of information we collect relates directly to what is reasonably necessary for AlphaCall's business activities and can include a wide range of personal information. For example, AlphaCall collects personal information which includes or may include: your name or change of name (such as by deed poll or marriage certificate), address and/or occupancy status, date of birth or death (death certificate), gender, occupation, contact details, payment information, credit information including financial and employment history, drivers licence and/or other government identification numbers, usage information such as the calls you make or the data volumes you use, passwords and location. AlphaCall also collects information about purchasing patterns, consumer preferences or attitudes from prospective, current and past customers for the purposes of developing products and services and for marketing purposes.

You may not wish to provide us this information or remain anonymous, however we may not be able to provide you with the product or relevant services you've requested or give you the service you expect.

Generally, we don't need any sensitive information from you such as details about your race, ethnicity, political views, religious or philosophical beliefs, sexual preferences, health, genetics or criminal records as it has no bearing on the services we provide. Sometimes our customers do choose to tell us about their health if this has a bearing on the communication

services they expect from AlphaCall, and this information is collected and stored only with their permission and only for the purpose it was provided for.

4. How AlphaCall collects your personal information

Mostly, AlphaCall will collect most personal information directly from you. For example, when you fill in a form online on our website, call us and give it to us over the phone or email us, or contact us via social media platforms such as Facebook or Twitter.

We may also collect information indirectly through other sources.

These include:

- (a) When you use a product,
- (b) A survey you completed,
- (c) Responses you've made to an offer or promotion,
- (d) When you pay your bill,
- (e) When you use self-service channels,
- (f) From our equipment
- (g) Through our employees, agents, contractors or suppliers,
- (h) Third parties service providers, including, without limitation,
- (i) commercial associates, credit reporting bodies and credit providers,
- (j) From publically available sources such as through the purchasing of marketing lists, database and data aggregation services,
- (k) From our customers' authorised representatives, and
- (l) When we are required by law to do so.

Sometimes other people will give us personal information about you such as your employer (if you are using a business product) or a parent, guardian or trustee. We may also collect personal information from third parties if they are able to disclose it to us, if it's not practicable to collect it from you. We may for instance, buy or obtain personal information from trusted sources to help us to identify people or businesses who may be interested in hearing about our services or products.

Other ways we collect information include via online activity.

These may include:

- (a) Via your Internet Protocol (IP) address, for example, to help diagnose problems with our own internet access, to administer our website, or if required by law to do so,
- (b) Through site performance identifier which gives us information about how our websites are being used, and
- (c) Through analytic or advertising "cookies" or digital identifiers, which are usually small lines of text that are stored with your Web browser for record keeping purposes, and which we use to obtain statistical information and to understand what advertising may be relevant. Your browser has options in its security settings to accept, reject or provide you with a notice when a cookie is sent, and you can clear these and disable future use of cookies and digital identifiers if you want to.

5. How AlphaCall holds your personal information

At AlphaCall we have a series of security measures in place to protect your personal information. We keep customer information in controlled systems that are protected with authorised access only and prevent copying of your personal information. We use secure server and closed network environments and encrypt data in transit. We manage and access privileges to ensure your personal information is limited to only those who require it. We also provide continuing training to our staff and regular security reviews and we have dedicated teams who monitor and maintain this. Most importantly, we remain ever-attentive to protecting your personal information.

The controls are the same and just as strict, irrespective of where your AlphaCall staff member is located. AlphaCall protects your personal information by:

- (a) Completing ID checks to verify your identity and to check the details we hold about you are correct and up-to-date,
- (b) Regularly monitoring, training and quality assessing our staff in matters of privacy,
- (c) Storing all data in secure centres in Australia only,
- (d) Providing system access only via controlled logins and different security and authorisations levels that ensure access to information for all staff is related only to the job role they perform and have been trained for,
- (e) Ensuring functional restrictions apply including remote access being applied to limited people specifically to perform their mandated job role,
- (f) Securing our property and operational systems with authorised security access only,
- (g) Ensuring system access and modification to customer records is logged under the specific staff member and conducting occasional audits to monitor this activity,
- (h) Applying security restrictions to copying, printing and recording information and limiting access to such operations to authorised personnel only,
- (i) Implementing strict security protocols on the transfer of data within AlphaCall.

6. Who AlphaCall may share your personal information with

AlphaCall is a solely owned Australian company based in Clyde, Australia. We do not outsource our primary services to any third party companies and so your privacy is protected by the same rules and regulations irrespective of who in AlphaCall is handling your personal information at the time.

We may also be required to share your personal information with organisations outside of AlphaCall. These may include:

- (a) Regulatory or legal bodies overseeing a complaint or concerns of yours (such as the Telecommunications Industry Ombudsman),
- (b) Technicians we engage to ensure your service is working,
- (c) Suppliers we use to supply you the service,
- (d) Debt collectors or other such companies that assist in debt recovery,
- (e) Credit reporting bodies or credit providers if there are failed payments,
- (f) Fraud-checking and authorised security agencies to carry out checks,
- (g) Other telecommunications and information service providers when, for example, you are moving services between one or another,
- (h) Our professional advisors or contractors, for example our auditors, accountants or lawyers, and
- (i) Any authorised government or regulatory authority or enforcement agency where we are required or specifically permitted under law to.

We would also supply your personal information to any authorised representative or nominated contact person you have agreed to, including your legal advisors, trustees, guardian or advocates. Basically, AlphaCall will only supply information to people you nominate or if the disclosure relates to the main reason we collected the information and you'd reasonably expect us to do so. AlphaCall may also give access where we are permitted or obliged to under Australian law, to your personal information. Some circumstances where this may occur include to react to unlawful activity, to reduce or prevent a serious threat to life, health or safety, or with serious misconduct. We may also give personal information in order to maintain the Integrated Public Number Database (IPND), which supplies information for telephone directories and assists with the dispatch of emergency services.

7. How to access your personal information

You are welcome to ask us for it (we'll always confirm your identity first) or you can access it through your secure member services facility, there is usually no cost associated with providing you access to the personal information we store about you, however if your request is particularly complex or requires a detailed search of our records, there may be an associated

charge. We'll let you know if there is, prior to undertaking your request. If you believe there are errors with the information we hold about you, we ask that you let us know as soon as is practical and you always have the right to ask us to correct this information. There are some instances where we may not be able to provide access, such as if we are prevented by law; if it poses a serious threat to health or safety; where it may have an unreasonable impact on the privacy of others; where it may prejudice a law enforcement or crime prevention activity; where it may prejudice legal proceedings or negotiations AlphaCall has with you; or where revealing the information is connected with a commercially sensitive decision making process.

Should you have questions, requests or concerns about your privacy, AlphaCall can be reached by emailing **compliance@alphacall.com.au** or by calling us on **1300 746 754**.

Alternatively you can mail us at: Unit 1, 40 George Street, Clyde NSW 2142

We maintain and update the personal information that we hold as it becomes necessary and our aim is to ensure we hold accurate, up-to-date and complete information so please contact us if you think our records need correcting.

If you have any queries concerning this Privacy Policy or our practices please contact us using the above contact details. Any privacy complaints will be handled in accordance with our complaint handling policy which can be found here:

<https://www.alphacall.com.au/terms>