

## **Privacy Policy**

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This Policy sets out the way in which Business Service Brokers Pty Ltd (ACN 069 049 994) trading as TeleChoice (TeleChoice) treats personal information. It deals with our collection, use, disclosure, security measures and a person's right to access and correct their personal information.

TeleChoice complies with all existing privacy Laws and, unless otherwise indicated, all terms used in this Policy have the same meaning as in the Existing Laws.

"Existing Laws" means:

- The Telecommunications Act 1997
- The Privacy Act 1988 (including the Australian Privacy Principles)
- The Telecommunications Consumer Protections Code C628:2019.

TeleChoice is committed to protecting and respecting your privacy. This Policy sets out the manner in which we will process any personal information that we collect from you or that you provide to us. You should read the following carefully so that you will understand our views and practises regarding your personal information and how we will treat it.

### **The type of information we collect**

"Personal Information" includes, but is not limited to, your:

- Name, date of birth, current and previous addresses, telephone or mobile phone numbers, email addresses, bank account details, credit card details, occupation, driver's licence details (if applicable) and your TeleChoice Username and Password.

Where you provide TeleChoice with personal information about other persons, who are your authorised representatives, it is your responsibility to obtain those persons' consent to the disclosure of their personal information. We are obliged to take reasonable steps to inform those persons that you have provided their personal information to TeleChoice.

Generally, we do not collect sensitive information about you (such as details of your race, political beliefs, religion or health). We will only collect sensitive information with your prior consent and only where it is necessary so that we can perform our activities or function.

### **Why do we collect personal information?**

We will only collect personal information where it is necessary for us to do so in order to perform one or more of our functions or activities, or where the information is necessary for us to supply customers with the products and services ordered from TeleChoice or its related entities, and also for:

- billing and account management;
- credit checking (as set out below);
- identity verification;
- business planning and product development;
- providing persons with information about TeleChoice promotions; and
- providing persons with information about products and services of our related entities and third party affiliates (with whom your personal information will not be shared).

### **How do we collect your information?**

#### *Directly from you*

We collect information directly from you. This includes information you provide us in application forms (online and in-store) and in discussions with our representatives on the phone. You may choose not to provide us with certain personal information and to deal with us anonymously. However this may affect the

services we are able to provide to you.

We do not collect personal information in a secret manner and will always obtain a person's consent for use of non-sensitive personal information for secondary purposes at the time of collection.

#### *From other sources*

We may also collect your personal information from third parties including:

- TeleChoice's related entities;
- your authorised representatives;
- Credit Reporting Bodies;
- publicly available sources of information; or
- other companies that are able to disclose it to us, and where it is not practical for us to collect the information directly from you.

Where we collect personal information from a source other than you, we will take reasonable steps to make sure:

- you know we have your personal information;
- how we got it; and
- how we will handle your personal information.

#### *From your online activity*

When you use our website, we may collect and process the following information about you:

- Details of your transactions on the website, information that you have filled in on forms such as information provided by you at the time of requesting or subscribing to any service, or becoming a registered user, or where you enter any competition or promotion sponsored by TeleChoice, information you have filled in on surveys where you choose to respond to them, communications you send to TeleChoice such as where you report a problem or submit a comment regarding the website and details of your visits to the website, including, but not limited to, traffic data, location data and the resources that you access.

Where you contact us via the Internet, we may collect information about your computer including, where available, your IP address, your operating system and browser type, for system administration. This is statistical data, which does not identify any individual.

We may also for the same reason obtain information about your general Internet usage by using a cookie file, which is stored on the hard drive of your computer.

Cookies contain information that is transferred to your computer's hard drive and help us to improve our website and to deliver a better and more personalised service. They help us to:

- Estimate our audience size and usage pattern.
- Store information about your preferences and so helps us to customise the website according to your individual interests.
- Speed up your searches.
- Recognise you when you return to the website.

If you wish to refuse to accept cookies you can do so by activating a setting on your browser, which allows you to do so. However, if you select this setting, this may prevent you from being able to access parts of the website.

Unless you have adjusted your browser setting to refuse cookies, our system will automatically issue cookies when you use the website.

Most browsers will have a help menu on the toolbar which will show you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

You can find out more about cookies by visiting the following website:

[www.allaboutcookies.org](http://www.allaboutcookies.org)

Where you follow a hyperlink from this website to any other website, each such website will have their own privacy policies. TeleChoice does not accept any responsibility or liability for the policies of any non-TeleChoice website. It is your responsibility to check the policy of each website before you submit any of your personal information to those websites.

### **How do we use your information?**

You authorise and consent to TeleChoice using information held about you in the following ways:

- to verify your identity, undertake checks for creditworthiness and fraud, fulfil your orders, provide you with information, products or services, that you request from us, or information relating to products or services which we feel may be of interest to you and where you have indicated that you wish to be contacted for such purposes, to ensure that content from this site is presented in a most effective manner for you, to enable you to participate in any interactive features of our services if you choose to do so and notify you of any changes to our services;
- to share that information with other entities including government and law enforcement agencies, telecommunications carriers, external contractors and service providers for the above purposes and other related purposes;
- to use that information for direct marketing of our products and services; and
- to share that information with our related entities for direct marketing by those entities of third party products and services.

Some of these entities, to which your personal information may be disclosed, are located in other countries. These countries are: the Philippines.

Where we rely upon the direct marketing exception for direct marketing to persons, we will endeavour to ensure that:

- The person is clearly notified of their right to be excluded from any further direct marketing.
- We will only use the information once before allowing persons to be excluded from any further direct marketing and this applies both to TeleChoice and its related entities.
- The person may be excluded in all further instances of direct marketing even if they have not previously chosen to be excluded, and we will respect a person's decision to be excluded from direct marketing.

TeleChoice does not use sensitive information for direct marketing.

You acknowledge that TeleChoice may give information about you to a Credit Reporting Body to obtain a Consumer Credit Report about you and/or to allow the Credit Reporting Body to create or maintain a Credit File for you.

The Credit File may include:

- Your personal information, the fact that you have applied for credit, information regarding any payments that are more than sixty (60) days overdue, or any cheques, which have been dishonoured and information that, in the reasonable opinion of TeleChoice, you have acted fraudulently or shown an intention not to comply with your credit obligations.

This information may be given before, during, or after the provision of credit to you or where your application for credit is not approved.

You acknowledge that TeleChoice may disclose your personal information to third parties where you have consented to such disclosure, including consent for disclosures made under the Credit Reporting Requirements of the Privacy Act.

You agree that where TeleChoice discloses personal information about you to a related entity, the related entity is not bound by the original primary purpose for which the information was collected.

You agree that we may disclose your personal information to third parties to enable the outsourcing of functions, for a related secondary purpose, or where such disclosure is within your reasonable expectations.

TeleChoice takes reasonable steps to ensure that its Contracts with third parties include requirements for them to comply with the use and disclosure requirements of the Privacy Act.

### **Keeping your personal information secure**

The information that TeleChoice collects from you will either be processed by staff that work for TeleChoice, or a related entity, or for a service provider. Such staff may be involved in the fulfilment of your order, the processing of your payment details, the facilitation of credit reporting and/or the provision of support services.

All registration and order information provided to TeleChoice is stored on secured servers. Any payment transactions will be encrypted using Secure Sockets Layer (SSL) technology.

TeleChoice does not store credit card details.

Where you have been given, or have chosen, a Password, which enables you to access certain features or parts of the TeleChoice site, it is your responsibility to keep the Password confidential and not to share it with anyone.

TeleChoice advises you that the transmission of information via the Internet is not always secure. Although TeleChoice will do its best to protect your personal data, we cannot guarantee the security of any data transmitted to the website.

You acknowledge that any transmission of your data to this site is at your own risk.

However, once we have received your information, we will use strict procedures and security features to try and prevent unauthorised access.

### **Overseas' access to your information**

Where we send personal information overseas, we will require the overseas organisation receiving the information to provide us with a binding undertaking that it will handle that information in accordance with the Australian Privacy Principles.

You have the right to ask us not to use your personal information for direct marketing purposes. You can exercise this opt-out right at any time via a Service Desk request in the [Members Area](#).

### **Accuracy of your personal information**

TeleChoice does not use personal information without taking reasonable steps to ensure that the information is accurate, complete and up to date, however, because the accuracy of the information we possess depends upon the information provided by you, you must keep us informed of any errors in, or changes to, your personal information.

### **Accessing your personal information**

The Privacy Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. For more information, visit [www.privacy.gov.au](http://www.privacy.gov.au). TeleChoice will at all times endeavour to correct details of any personal information as soon as practically possible following a request from you to do so, in accordance with the Privacy Act 1998.

TeleChoice does not charge a fee for processing an access request except where the request is particularly resource intensive.

#### **How long do we keep your information?**

TeleChoice will normally destroy personal information after as short a time as possible and unless otherwise required by Law, after a maximum time of seven (7) years.

### **Credit Reporting Policy**

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The purpose of this policy is to provide you with information about our credit management practices and how we manage your credit-related information.

TeleChoice may provide credit as contemplated in the Privacy Act to our customers with our products and services (for example, post-paid accounts) and as a result, we may collect credit information and credit eligibility information about you as referred to in the Privacy Act. This section sets out how we manage that information.

#### **How we collect and hold information and credit eligibility information about you**

Credit information relates primarily to your credit related dealings with TeleChoice and covers various types of information that can be collected by Credit Reporting Bodies (**CRBs**) that report on consumer credit worthiness.

Credit information includes:

- identification information
- basic information about your credit account (for example when it was opened)
- details about information requests we make about you to CRBs
- information about certain overdue payments and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these
- various publically available information like bankruptcy and credit related court judgements
- information about your credit worthiness such as credit scores, credit risk ratings, summaries and evaluations.

TeleChoice may collect credit information about you in any of the circumstances relating to other personal information described in our Privacy Policy under '[Why do we collect personal information](#)'. Credit eligibility information is information equivalent to the kinds listed above that we generally collect from CRBs.

This information relates primarily to your dealings with other credit providers (for example, banks, other financial institutions, or other organisations that may provide you with credit in connection with their products or services). It may also include certain credit worthiness information that we derive from the data that we receive from a CRB. Sometime, we may also collect credit eligibility information about you from other credit providers

We store and safeguard your credit information and credit eligibility information in the ways described in our Privacy Policy under '[Keeping your personal information secure](#)'.

#### **Statement of Notifiable Matters (Credit Reporting Privacy Code)**

##### **Disclosing your credit information and credit eligibility information**

We may disclose your credit information to CRBs such as illion Australia Pty Ltd (formerly Dun & Bradstreet) (w: [www.illion.com.au/](http://www.illion.com.au/) e: [chc-au@illion.com.au](mailto:chc-au@illion.com.au) t: 1300 734 806)

The CRB may include in reports the credit related information we provide to it. Those CRBs may then include that information in credit reporting information that they provide to other credit providers to assist them to assess your credit worthiness.

If you fail to meet your payment obligations or commit a serious credit infringement, we may disclose this to a CRB.

You have the right to access credit related information we hold about you, request that we correct the information, and make a complaint, as set out further in our Credit Reporting Policy.

You can request a credit reporting body not to use your credit reporting information for the purposes of pre-screening of direct marketing by us.

You can request a credit reporting body not to use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

We may also use and disclose your credit information for other purposes and in other circumstances as described in our Privacy Policy under '[How do we use your information](#)' when permitted to do so under the Privacy Act.

Our use and disclosure of credit eligibility information is regulated by Part IIIA of the Privacy Act and the Credit Reporting Privacy Code. We will only use or disclose such information for purposes permitted by these laws, such as:

- processing credit-related applications and managing credit that we provide
- assisting you to avoid defaults
- collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements
- assigning our debts
- participating in the credit reporting system
- dealing with complaints or regulatory matters relating to credit or credit reporting
- as required or authorised by another law.

### **Making a complaint**

If you wish to complain about any breach or potential breach of the Privacy Policy or the Australian Privacy Principles by us, or if you think that we have not complied with Part IIIA of the Privacy Act or with the Credit Reporting Privacy Code (which regulates credit reporting) you can contact us and request that your complaint be directed to the Privacy Officer.

We will use our best efforts to respond to your complaint within 7 days of receiving your complaint. It is our intention to use our best efforts to resolve your complaint to your satisfaction, however, if not satisfied with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

TeleChoice reserves the right to change this Privacy Policy from time to time by changing it on our website. The amended policy will apply between us regardless of whether or not we have given you specific notice of the change.

You can request a copy of our Privacy Policy or Credit Reporting Policy by contacting us, or obtain it directly from our website. You can ask us to provide you a hard copy of our Privacy Policy or Credit Reporting Policy (including the Statement of Notifiable Matters). You can request a copy of the credit reporting body's credit reporting policy from its website.

If you require more information about TeleChoice's Privacy Policy, please contact us as follows:

- Telephone: 1300 835 324 Monday to Friday 9.00am to 6.00pm AEST
- Online: [www.telechoice.com.au/help/contact](http://www.telechoice.com.au/help/contact)
- Email: [support@telechoice.com.au](mailto:support@telechoice.com.au)
- Mail: PO Box 5161, South Melbourne, Vic. 3205.