

# Alinta Energy

## Privacy Policy

Effective July 2023



### 1. ABOUT THIS POLICY

- 1.1. This is the Privacy Policy of Alinta Energy Pty Limited (ABN 64 614 975 629) and its subsidiaries, including Alinta Sales Pty Ltd and Alinta Energy Retail Sales Pty Ltd (Alinta Energy). Alinta Energy provides a wide range of energy and energy-related products and services to the community.
- 1.2. Protecting your privacy is crucial to the way Alinta Energy conducts our business. This Privacy Policy describes how we carefully manage and safeguard your Personal Information (including sensitive information), how we collect and use all of this information to provide our products and services to you and how we comply with our obligations under the Privacy Act 1988 (Cth) (Privacy Act).
- 1.3. We take privacy seriously at Alinta Energy and we are committed to protecting your privacy — not just because it is the law, but because handling Personal Information transparently and responsibly is a key part of creating a great customer, employee and business partner experience. Alinta Energy does not sell, rent or trade your Personal Information.
- 1.4. The Privacy Act defines Personal Information as: Information or an opinion about an identified individual, or an individual who is reasonably identifiable; a. whether the information or opinion is true or not; and b. whether the information or opinion is recorded in a material form or not.

#### Why Alinta Energy's Privacy Policy is important.

- 1.5. Alinta Energy collects, holds, uses and discloses Personal Information to carry out Alinta Energy's functions or activities and to comply with our obligations under the Privacy Act and the Australian Privacy Principles (APPs).
- 1.6. This Privacy Policy guides Alinta Energy and regulates how we manage and protect your Personal Information.

#### Who is responsible for your Personal Information?

- 1.7. Alinta Energy is responsible for the safekeeping of Personal Information that is provided to us.
- 1.8. This Privacy Policy should be read in conjunction with:
  - any privacy or collection notice/statement that Alinta Energy provide to you; and
  - our Credit Reporting Policy (available at [alintaenergy.com.au/creditpolicy](https://alintaenergy.com.au/creditpolicy)) which explains how Alinta Energy manages your credit-related information.

### 2. TYPES OF PERSONAL INFORMATION WE COLLECT

#### If you are a customer or potential customer

- 2.1. If you are a customer or potential customer, Alinta Energy collects information about you to provide you with services and otherwise to facilitate your dealings with us. The main way Alinta Energy collects Personal Information about you is when you provide it to us.

- 2.2. The information Alinta Energy collects may include:
  - your contact information, such as your name, address, email address, telephone number and mobile phone number, NIM and Meter number;
  - payment information such as account details, data necessary for processing payments and other related billing information;
  - information about your financial / personal circumstances (such as concession details, employment, income and credit information);
  - details relating to the supply of energy to you and your use of our energy (including meter details and data related to your energy consumption, connection and interruptions);
  - information you provide to us when participating in customer surveys or competitions; and
  - a recording of your phone conversation with us.
- 2.3. In addition, with your express consent (except where otherwise allowed by law), Alinta Energy may collect sensitive information about you, which may include:
  - government related identifiers, such as your date of birth, driver's licence, passport, Medicare details that you provide to us (for example, when Alinta Energy need to verify who we are dealing with, who we are providing the product and/or service to and to ensure we are collecting any outstanding debts from the correct person);
  - health, concession and/or genetic information that you provide to us (for example, if there is a need to administer life support at your premises, you medically require heating or cooling or you make a concession or hardship request); and
  - potential, and known, domestic violence issues, including details about AVOs.
- 2.4. Alinta Energy may also collect Personal Information about your secondary contact, or your life support contact or your authorised representative which may include their name, date of birth, phone and email contact details, address and the relationship with you as our customer. We rely on you to inform these individuals that their Personal Information is being provided to Alinta Energy, that they should read this Privacy Policy and that they can contact us for further information.
- 2.5. Alinta Energy may obtain a credit report (details of your credit history) about you, which is used to determine your eligibility to become an Alinta Energy customer. Please see our Credit Reporting Policy (available at [alintaenergy.com.au/creditpolicy](https://alintaenergy.com.au/creditpolicy)) for more information.
- 2.6. If you create a MyAccount profile, you will need to provide your name, email address and customer number. Without this information, Alinta Energy cannot create a MyAccount profile for you. By providing your Personal Information, you agree to Alinta Energy using this to set up your MyAccount profile which you will need to complete by creating a password and accepting Alinta Energy's [MyAccount Collection Notice](#) and [Terms of Use](#).

### **If you do business or have other dealings with us**

- 2.7. If you, or your employer, does business with Alinta Energy or has other dealings with us, we collect information about you to facilitate those arrangements. This information may include your name, position, contact details, date of birth and any other information you provide to Alinta Energy. For security reasons, we may also take your photograph when you sign into our office or site locations.

### **If you are an employee or applicant**

- 2.8. If you are an employee or a job applicant, Alinta Energy collects information about you to administer your employment or process your application. This may include qualification and identification information, residency / visa status information, medical records and health information, reference details, screening check information (such as background, medical, drugs and alcohol, criminal records, police checks, bankruptcy, directorship and company checks), psychological testing results and results from records checks.
- 2.9. In addition, when you apply for a job or position with Alinta Energy, we may collect information about you from any recruitment consultant, your previous employers, referees, CV checking agencies or others who may be able to provide information to assist us to assess your application. Further details of what information is collected if you are offered a position are contained in Alinta Energy's Recruitment Privacy Statement.

## **3. TYPES OF PERSONAL INFORMATION WE COLLECT**

### **Directly from you**

- 3.1. In many instances, Alinta Energy collects Personal Information directly from you. For example, if you are a customer, we may collect your information from an application form you have completed, or when you contact us by phone, email, through our website or via social media sites.
- 3.2. Your calls to Alinta Energy's customer contact centre are recorded and monitored for training, service quality control, verification and compliance purposes.
- 3.3. Some other examples of how Alinta Energy collects Personal Information include:
- If you use our registration system to visit our offices and site locations.
  - If you work with us or apply for a job with us.
  - If you engage with us via our website, officers or call centres regarding our activities.
  - When you or your organisation offer to provide, or provide, products and or services to us.
  - When you enter an Alinta Energy competition or participate in a survey.

### **From our partners**

- 3.4. If you are a customer or potential customer, Alinta Energy may collect information about you through our service providers who provide customer acquisition and onboarding services to us. These service providers may be companies who provide energy comparison or moving assistance services. They collect your information from you and then provide it to Alinta Energy for the purpose of assisting you to become our customer.
- 3.5. If you participate in the Alinta Energy Rewards Program, we may collect anonymised information about your transactions and purchases from our Rewards Program partner.

### **From other third parties**

- 3.6. Alinta Energy may also collect information about you from other third parties such as electricity and gas distributors, credit reporting bodies, market data research firms, contractors engaged to monitor metering and provide payment/billing services, government agencies and regulators and other third party service providers.

### **Through other means**

- 3.7. In the course of Alinta Energy's functions or activities, we may collect Personal Information (including Sensitive Information) about you indirectly from publicly available sources or from third parties such as:
- through our advanced metering infrastructure (e.g. through our monitoring of smart meter data); and
  - from your secondary contact or authorised representatives.

Alinta Energy will only store this information for as long as it is needed to perform the function or activity for which it was collected. Alinta Energy will destroy or de-identify information when it is no longer required for that purpose.

- 3.8. Alinta Energy may collect Personal Information via our website - see Part 5 Using our Website and Cookies below.
- 3.9. Alinta Energy may also collect Personal Information that you provide to us when signing up to mailing lists, registering for our events or when submitting a form or feedback on your experience with our website.

### **Anonymity**

- 3.10. Whenever it is lawful and practicable, Alinta Energy will allow you to interact with us anonymously or by using a pseudonym.
- 3.11. However, for most of our functions and activities Alinta Energy usually requires your name, contact information and enough information about the particular matter to enable us to fairly and efficiently handle your inquiry, request, complaint or application, or to respond to you, the relevant authorities or to another effected individual/organisations.

## **4. WHY WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION**

- 4.1. Alinta Energy collects, holds, uses and shares your Personal Information for our business functions and activities, which includes delivering our products and services, managing our business and complying with the law. We handle your information so we can:
- confirm and/or validate your identity;
  - facilitate the provision of energy and related services to your supply address;
  - communicate with you (by sending service, support and administrative messages, reminders and notices) and to keep you updated regarding our activities;
  - lessen or prevent a serious threat to the life, health or safety of any individual, or to public health;
  - assess concession entitlements and hardship requests;
  - deal with customer care related activities;
  - set or reset your password (where you have one) for My Account;
  - operate and administer accounts and to facilitate payments, refunds and managing debts (for example issuing bills, setting up direct debits, processing payments and refunds, recovering debts, selling debts and otherwise managing our financial activities);

- respond to your enquiries and resolve complaints and disputes;
- send you marketing and promotional messages and other information that may be of interest to you;
- consider an individual for employment;
- administer our Rewards Program, customer surveys, contests and other promotional activities or events;
- improve and optimise our services and our customers' experience (for example, by performing analytics and conducting research for advertising and marketing);
- carry out certain checks (for example, in relation to credit); and
- comply with our regulatory obligations, report to regulators and authorities and assess our legal compliance (including through internal and external audits).

4.2. If Alinta Energy does not have your Personal Information, we may not be able to deliver the products or services you have asked for or respond to your questions or comply with the law.

### Who we disclose Personal Information to?

4.3. Alinta Energy may disclose your Personal Information for the purposes described in this Policy to:

- our employees and Australian based related bodies corporate;
- the operator of the network through which energy is supplied to you, and the operators of other electrical networks;
- our service providers who assist us by, for example, providing IT services, installing meters, back office management services or customer acquisition and onboarding services (e.g. energy comparison or moving assistance providers);
- CV checking agencies (if you have applied for a position with us);
- third persons you have authorised us to provide your information to (such as secondary account holders or your authorised representatives);
- our Rewards Program partner, Neat Tickets Pty Ltd, trading as Neat Ideas (if you participate in our Rewards Program);
- financial institutions and payment system operators (including merchants);
- our insurance brokers, providers and consultants;
- our professional advisers, dealers and agents (including independent auditors, legal and tax advisers);
- debt collection agencies and others that assist us with debt recovery;
- the sponsors or promoters of any competitions that we conduct;
- credit reporting bodies (for more information, see our Credit Reporting Policy);
- State and Federal Government Agencies (e.g., Centrelink to administer concession entitlements);
- Regulatory bodies and Law Enforcement Agencies (e.g., the Office of the Australian Information Commissioner, the Energy Ombudsman, the Australian Energy Market Operator and the Police); and
- other persons as required or permitted by law.

4.4. Alinta Energy takes reasonable measures to ensure that the parties we share your information with are bound by confidentiality and the Privacy Act.

### What we will not do with your Personal Information

4.5. Alinta Energy will not use or disclose your Personal Information for another purpose (a secondary purpose) unless:

- we first obtain your consent;
- you would reasonably expect us to use or disclose your Personal Information for a secondary purpose that is related to the primary purpose or, in the case of Sensitive Information, directly related to the primary purpose;
- it is set out in this Policy;
- we are required to by Law;
- a permitted general purpose exists;
- a permitted health situation exists;
- we believe it is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

4.6. If Alinta Energy collects Sensitive Information about you, you consent to us collecting, using and disclosing the Sensitive Information for the purpose for which it was collected as disclosed and as permitted by the Privacy Act or other relevant legislation.

### Consumer Data Right (CDR)

4.7. Alinta Energy is designated as a data holder under the [Consumer Data Right \(CDR\)](#). The CDR provides consumers with greater access to, and control over, their data. Please see Alinta Energy's CDR Policy which outlines how Alinta Energy manages consumer data under the CDR regime, as well as your rights under it.

### Overseas disclosure

4.8. Alinta Energy may disclose your Personal Information to entities outside of Australia for our business functions or activities or for the purposes of providing services to you. Where we do so, we will take reasonable steps to ensure that the disclosure of, and access to, your Personal Information is secure, that appropriate controls are in place and that your Personal Information is handled in a manner consistent with the Privacy Act.

4.9. The entities we may share your information with may be located in, or have personnel that may access your information from, the following jurisdictions: the United Kingdom and the Philippines.

### Direct marketing

4.10. Alinta Energy and/or our business partners may send you direct marketing communications and information about products and services that we or third parties offer, including competitions that we think you might be interested in. This may take the form of emails, SMS, mail or other forms of communication.

4.11. These marketing communications may also be sent to you even if you are not, or no longer, a customer of Alinta Energy.

4.12. You may opt-out of receiving these marketing communications by clicking on the unsubscribe link in the electronic communication or by contacting us on 1300 781 651.

4.13. Even if you opt-out of receiving marketing communications, Alinta Energy may still contact you to send important administrative and safety messages, as well as to manage your account.

## 5. USING OUR WEBSITE AND COOKIES

- 5.1. Alinta Energy's website, [www.alintaenergy.com.au](http://www.alintaenergy.com.au), is hosted in Australia and there are a number of ways in which we collect information through our website.
- 5.2. Alinta Energy may collect Personal Information about you when you use and access our website (for example, when you submit an enquiry or online form, set up your account on the MyAccount platform, sign up to our newsletter, or enter a competition on our website).
- 5.3. Alinta Energy's 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. Although cookies are used to collect data about your browser type, the operating system you are using, the web page you visited, your internet service provider and your State location, Alinta Energy does not use this data to identify you personally.
- 5.4. Alinta Energy's website also uses Google Analytics, a web analytics service provided by Google, Inc. (Google). Google Analytics also uses cookies. Although these cookies do not identify you personally, they allow information about your use of our website (including your IP address and device ID) to be transmitted to Google. For more information, please see Google's site "How Google uses data when you use our partners' sites or apps", located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.
- 5.5. 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 access the full functionality of Alinta Energy's website. Please refer to your internet browser's instructions or help screens to learn more about these functions.
- 5.6. To assess the effectiveness of Alinta Energy's 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.
- 5.7. Alinta Energy's website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, Alinta Energy is not responsible for the privacy practices of, or any content on, those linked websites, and we have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from this Privacy Policy, so we encourage individuals to read them before using those websites.

## 6. SECURITY

- 6.1. Alinta Energy generally hold Personal Information in our electronic databases, but we may also store Personal Information in hard copy form and in various third party databases and platforms.
- 6.2. Alinta Energy is committed to the security of your Personal Information and takes reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

- 6.3. Alinta Energy uses a number of physical, administrative, personnel and technical measures to protect your Personal Information, which include, but are not limited to:
  - implementing internal processes and policies in relation to the collection, use and secure storage of Personal Information and educating our personnel in relation to these obligations;
  - storing Personal Information in secure, encrypted data centres;
  - using secure networks or encryption when transmitting electronic customer data and Personal Information;
  - using ID cards, cameras and sign in procedures to prevent unauthorised access to our offices and buildings;
  - requiring the third parties we engage to take adequate security measures and handle your Personal Information in a manner consistent with the Privacy Act;
  - complying with payment card industry security standards with respect to the storage and transmission of payment card details;
  - regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information;
  - taking measures to address those risks; and
  - having mandatory annual training for all our staff on our privacy obligations, with a focus on how to keep your information safe and secure.

## 7. REQUEST TO ACCESS PERSONAL INFORMATION

- 7.1. You can request access to the Personal Information that Alinta Energy holds about you at any time by contacting us using the details at the end of this Policy. We will ask you to verify your identity before we provide access to your information and we will try to make the process as simple as possible.
- 7.2. Alinta Energy will endeavour to respond within a reasonable period of receiving your request. Where reasonable, we will provide you with a copy or details of your Personal Information in the manner requested.
- 7.3. Sometimes Alinta Energy may be unable to provide you with access to some or all of your personal information (for example we reasonably believe that providing access would have an unreasonable impact on the privacy of other individuals, would pose a serious threat to the life, health or safety of any individual/to public health/public safety or would be unlawful/prejudicial). Where this is the case, we will tell you why.

## 8. REQUEST TO CORRECT PERSONAL INFORMATION

- 8.1. Alinta Energy takes reasonable steps to ensure that the Personal Information we collect, use and disclose is accurate, complete, up to date and relevant.
- 8.2. If you believe the Personal Information that we hold about you is inaccurate, incomplete or outdated, please contact us using the details at the end of this Policy. We will endeavour to respond within a reasonable period of receiving your request.
- 8.3. We will ask you to verify your identity before we make any corrections.
- 8.4. If we do not think that the information needs to be corrected, we will tell you why. If we do not correct your Personal Information, you can ask us to include a statement (that will be attached to that information) that you believe the information is incorrect and why.

## 9 DESTRUCTION/DE-IDENTIFYING OF PERSONAL INFORMATION

- 9.1. When Alinta Energy no longer needs the Personal Information collected for any purpose for which the Personal Information may be used or disclosed, Alinta Energy will destroy/de-identify the Personal Information in accordance with the Privacy Act requirements.

## 10 PRIVACY COMPLAINTS

- 10.1. If you believe that we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your Personal Information, we encourage you to contact us using the details at the end of this Policy.
- 10.2. Please include your name, email address and/or telephone number and clearly describe your complaint. We will respond within a reasonable period of receiving your complaint.
- 10.3. If we receive a complaint from you about how we have handled your Personal Information we will determine what (if any) action we should take to resolve the complaint.
- 10.4. If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior officer than the officer whose actions you are complaining about.
- 10.5. If you are not satisfied with Alinta Energy's handling of your complaint, you can lodge a complaint with the Office of the Australian Information Commissioner (OAIC). For further information regarding how to make a complaint to the OAIC, you can visit [oaic.gov.au/privacy/privacy-complaints](https://oaic.gov.au/privacy/privacy-complaints).

## 11 HOW TO CONTACT US

- 11.1. Alinta Energy welcomes your views about our Privacy Policy.
- 11.2. To ask us a question, access your Personal Information, request a correction to your Personal Information, make a complaint, or get a copy of this Policy, you can contact Alinta Energy either by post, phone or email as set out below:

### Postal Address:

Alinta Energy  
PO Box 16196  
Collins Street West VIC 8007

### Postal Address for Western Australian customers:

Alinta Energy  
PO Box 8348 Perth WA 6849  
Phone: 1300 113 800 click for more numbers

- For Credit Related Matters marked your correspondence Attention: Credit Team. The Credit Team's email is [ECDefaultListing@alintaenergy.com.au](mailto:ECDefaultListing@alintaenergy.com.au) or for Western Australian customers it is [DefaultListingSupport@alintaenergy.com.au](mailto:DefaultListingSupport@alintaenergy.com.au).
- For General Customer Enquiries marked your correspondence Attention: Customer Service Team. The Customer Service Team's email is [customer.service@alintaenergy.com.au](mailto:customer.service@alintaenergy.com.au).
- For Privacy Matters marked your correspondence Attention: Privacy Officer. The Privacy Officer's email is [privacy@alintaenergy.com.au](mailto:privacy@alintaenergy.com.au).

## 12 REVIEW OF POLICY

- 12.1. Alinta Energy's Privacy Policy will be reviewed by our Privacy Officer at least every two years or more frequently if changes are required, including when there are legislative changes or changes to our information handling practices. The next scheduled review will be July 2025.
- 12.2. When we change our Privacy Policy, we update it on our website. This Policy was last reviewed in July 2023.