



Privacy Policy

Redfox is required to comply with the Privacy Act 1988 (Cth) and is bound by the Australian Privacy Principles (APPs) set out in that Act. The APPs establish minimum standards for the collection, use, disclosure and handling of personal information. They apply to personal information in any form, including electronic and digital form. The APPs can be accessed at the website of the office of the Australian Information Commissioner: www.privacy.gov.au.

Redfox is also subject to privacy obligations under the Telecommunications Act 1997 (Cth), Telecommunications (Interception and Access) Act 1979 (known more commonly as Data Retention legislation) and the Spam Act 2010 (Cth) which governs our direct marketing activities.

Why Does Redfox Collect Personal Information?

Redfox collects personal information in order to:

- Manage and administer the products and services we provide, including for billing and credit control purposes;
- Required to operate our business;
- We may need to provide this to other parties in connection with our business;
- Inform customers about changes and improvements to Redfox products and services;
- Market Redfox products and services to current and prospective customers; and
- Comply with our legal obligations.

Redfox needs to be able to collect personal information for most of its business activities, although the information we require depends on the particular circumstances. If we are unable to collect the personal information we need, we may be unable to meet the expectations of our customers or provide the products and services they wish to receive.

What Personal Information Does Redfox Collect?

Redfox needs to collect basic identifying and contact information for all customers, including prospective customers. This will usually include name, date of birth, email address, telephone number(s) and residential address. For corporate and business customers, Redfox collects information about nominated contacts, including name and title or position, date of birth, telephone number(s) and email and business addresses.

For the purposes of the Data Retention Legislation, Personal Information also refers to information retained for the purposes of this, if it relates to an individual or a communication to which the individual is a party.

Broadly, we may collect and hold:

- **Proof of Identity** including name, date of birth, gender, occupation and driver licence number, passport, name change certificates or other official documentation.
- **Contact Details** such as physical, postal, work and email addresses and phone numbers.
- **Financial Details** like bank account, credit card numbers and your billing and payment history.
- **Service-related Details** such as your user name, encrypted password, service usage history, support incidents, enquiries and complaints.
- **Other Details** relating to special situations such as have animals at the property for safety reasons, and if requiring support, whom your designated authorised representative is.
- **Data Retention Laws Detail** (where the law applies) includes subscriber account details, service details, details about telecommunication devices, the source and destination of communications, the date and time of communications and connections to services, the type of a communication or service and location details.



In any case, we only collect personal information which is considered reasonable to support our functions and activities.

How Does Redfox Collect Personal Information?

We collect personal information by various means and via various media, depending on the particular business context. We collect information about prospective customers directly. We may collect this information:

- When you make an enquiry at our Redfox office or Redfox event;
- When you make a phone enquiry;
- Through our website; and
- Through social media platforms such as Twitter and Facebook.

When you become or apply to become a Redfox customer, we will ask you to consent to us collecting information from particular third parties. We will only collect personal information from those parties if you consent. If you do not consent, we may not be able to provide the service or product you require. We are authorised to collect some personal information from third parties under Privacy Law.

Redfox's Use and Disclosure of Personal Information

Where Redfox collects personal information for a particular purpose, it may use and disclose the information for that purpose or another purpose that is related to that purpose (or that is directly related to that purpose in the case of sensitive information). For example:

- Personal information collected from you for the purpose of establishing or managing an account may be used and disclosed for related purposes such as identity verification, credit checking, supplying and servicing a product, connecting and administering a service, billing and collection in relation to the service and investigating and rectifying complaints or faults.
- Personal information collected for the purpose of establishing or managing an account may also be used for the purpose of marketing other Redfox products and services. Redfox may contact prospective, current or past customers about products and services (including products not related to a product or service previously supplied).

Redfox may use personal information about prospective, current and past customers for the purpose of direct marketing of Redfox products and services. Direct marketing communications may be sent via post, email, telephone, door to door canvassing, social media sites or other means. However:

- Redfox will not use sensitive information for direct marketing purposes without your consent
- Whenever we communicate with you for direct marketing purposes, we will give you the opportunity to opt out of receiving further direct marketing communications from Redfox.
- You may opt out of receiving direct marketing communications from Redfox at any time by contacting us at internet@redfoxcorp.com.au or calling 07 4951 7777.

Redfox may disclose personal information about Redfox customers to a range of third parties. For example, Redfox may disclose customer information to a wholesaler or other third party who provides or assists with the provision of a service.

Redfox may provide customer information to the Telecommunications Industry Ombudsman for complaint management purposes for telecommunication services.

Personal information may also be disclosed to third party agents and service providers who Redfox engages to assist in the provision of products and services. These include:

- Organisations that process banking transactions;
- Organisations that process debt collection;
- Printers, mail distributors, couriers and dispatch centres;



- IT service providers and data managers;
- Legal, accounting, insurance and business advisory consultants services

Personal Information Redfox obtains in connection with the provision of telecommunications services may be disclosed in accordance with requirements of the *Telecommunications Act 1997 (Cth)* and the *Telecommunications (Interception and Access) Act 1979 (Cth)*. This includes disclosure:

- To the Telecommunications Industry Ombudsman for the purpose of complaint management;
- To comply with Data Retention obligations; and
- To law enforcement agencies for law enforcement or security purposes.

How Does Redfox Protect Your Personal Information?

Redfox recognises the importance of protecting your personal information and of ensuring that it is complete, accurate, up-to-date and relevant.

We have extensive processes in place to ensure that our information systems and files are kept secure from unauthorised access and interference. These include:

- System access is controlled by logins and different security levels. Access to customer information for all staff is centrally controlled.
- Access authorisation is layered and access authorisations are specific to the job function of each staff member. For example, staff with responsibility for fault management have no access to credit card information. Staff are only trained in areas of the system specific to the function of their job.
- Account and system access and modification is logged to enable access or modification of any customer record by any staff member to be identified. Audits of access logs are conducted periodically.
- Where required under Data Retention Legislation, it will be encrypted.

Can You Access or Correct Personal Information Redfox Holds About You?

You have a right to access personal information we hold about you. If your request is particularly complex or required detailed searching of our records, there may be a cost to you in order for us to provide you with this information.

If you believe there are errors in the information we hold about you, you have a right to ask us to correct the information.

However, we are not required to provide access where we believe doing so would:

- Prejudice law enforcement or crime prevention activities;
- Have an unreasonable impact on the privacy of other individuals;
- Prejudice Redfox in legal proceedings or negotiations with you;
- Reveal information connected with a commercially sensitive decision making process; or
- Be contract to law.

If you wish to have access to information Redfox holds about you, you should contact Redfox Customer Service.

Complaints and Further Information

If you believe your privacy has been interfered with and wish to make a complaint, please contact our office.

If you are dissatisfied with the outcome of your complaint, or you do not receive a response to your complaint within 30 days, you may make a complaint to the Office of the Australian Information Commissioner (OAIC). Complaints to the OAIC must be made in writing. Where possible, complaints to the OAIC must be made through the online Privacy Complaint form, available at www.oaic.gov.au/privacy/making-a-privacy-complaint.