

## privacy policy

### Introduction

We have adopted and are committed to meeting the standards set out in the Privacy Act 1988 (Cth) and the Australian Privacy Principles, which together govern the way we collect, store, secure, use, disclose and dispose of personal information.

### What information we may collect

The following types of personal information about you - Information required to verify your identity, provide you with products and services and ongoing communication related to the products and services including:

- your name and contact details (such as address, email address, and telephone numbers);
- your age or birth date;
- your profession, occupation or job title;
- information about you and your business as part of our diligence process;
- details of the products and services that you have acquired from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- information about your usage of our services to access the internet, network usage and performance and the operation of equipment, applications or services on our network; financial and credit information;
- any additional information relating to you that you provide to us directly through our website, social media sites or indirectly through use of our website or online presence, through our representatives or otherwise;
- if you are a job applicant, information that you submit to us as part of the job application process;
- if you are an employee or contractor, information relating to your engagement with us; and
- information you provide to us through our websites, customer service team, customer surveys, promotions or visits by our representatives from time to time.

- We may collect information through your access and use of our social media sites, or when you call or email us;
- during conversations between you and our representatives;
- when you complete an application, form or purchase order; and
- audio recordings, call transcripts, interaction logs or summaries created when you contact our customer service team, including interactions handled by automated or AI-based systems;
- when you use our networks, products or services including our customer service call centre and online services.

We may also collect personal information from third parties including law enforcement agencies and other government entities credit reporting body; and third parties who you have referred us to (for example, referees or authorised representatives)

### How we maintain information security and data quality

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. To help protect the privacy of data and personal information that we collect and hold, we maintain physical, technical and administrative safeguards. Our systems and service providers may be located in Australia or overseas, including the United States. Where personal information is stored or processed outside Australia, we take reasonable steps to ensure that overseas recipients handle personal information in a manner consistent with the Australian Privacy Principles.

We may hold your information in either electronic or hard copy form. Personal information is destroyed or deidentified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

### How we use your information

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of service to you. We collect, hold, use and disclose your personal information for the following purposes: to provide our products and services to you and to send communications requested by you;

- to consider, assess and process communications (including requests for services or complaints) received from you;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- We may use automated systems and artificial intelligence (AI) tools to assist with customer support, particularly outside standard business hours. These systems may interact with you directly to respond to general service, billing or network enquiries, or to assist in routing or resolving requests.
- We do not use customer personal information or interaction content to train our AI agent. Our AI service providers have confirmed that customer data processed through our AI-assisted services is not used to train their underlying artificial intelligence models.
- Our AI-assisted services are designed to support, not replace, human decision-making. Customers may request to speak with a human representative where available.
- Our automated and AI-assisted services are limited to handling general service enquiries, billing enquiries and network outage information only. These services are not used to manage or resolve complaints, financial hardship matters, vulnerability or safety-related matters, or requests to change account ownership, access, authorities or services that require identity verification or the exercise of discretion.

- Our AI-assisted services do not make binding contractual or credit decisions. Where a request falls outside this scope, or requires human judgement, the interaction will be referred to a human representative.
- for the administrative, marketing (including direct marketing), planning, product or service development, research purposes of us and our related bodies corporate, contractors or service providers;
- quality assurance, training, dispute resolution, service improvement and compliance, including reviewing call recordings or transcripts generated by customer support interactions.
- to update our records and keep your contact details up to date;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority; and
- to maintain our website.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy statement or permitted by law.

### Domestic, family and sexual violence support

We recognise that some customers may be experiencing domestic, family or sexual violence and may be in vulnerable circumstances. We take additional care in the collection, use and handling of personal information for these customers, including providing access to alternative and safer contact arrangements where requested. Our automated and AI-assisted services are designed to support general enquiries only and are not intended to replace appropriate human handling of vulnerable customer situations. Where a customer indicates vulnerability or safety concerns, their matter will be referred to a trained human representative in accordance with our domestic and family violence policies and procedures.

### Disclosure of your information

We may disclose your personal information to our related bodies corporate, contractors or service providers for the purposes of operation of our business, our websites, to satisfy the terms of our Customer Service Agreement with you, fulfilling requests by you, and to otherwise provide products and services to you (including, without limitation IT systems and network administrators, mailing houses, couriers, payment processors, data entry service providers, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants);

comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority; service providers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes develop our credit assessment and credit worthiness rating system; and any

### organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate. We may also disclose your personal information to credit reporting bodies for identity checking and credit related purposes (such as credit rating or worthiness, default listing, credit provision and financing). For further details, please see the 'Credit Reporting' section below. We may, from time to time, disclose your personal information to an organisation that may be based outside the location where your personal information is collected. This may include disclosure to service providers located in the United States who support our customer support systems, artificial intelligence (AI) processing, call handling, data storage, analytics, or related IT services.

We take reasonable steps to ensure that overseas recipients handle personal information in a manner consistent with the Australian Privacy Principles.

### Access and correction of your personal information

It is an important part of providing our services to you that your personal information is up to date. You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). This includes personal information contained in call recordings, transcripts or other records generated through interactions with our customer support services, including AI-assisted services.

- We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you (we will let you know at the time of the request).
- We will not charge you for simply making the request and will not charge you for making any corrections to your personal information. As part of this request, we may need you to verify your identity and provide this in writing to us.
- There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal. • If you believe that personal information, we hold about you is incorrect, incomplete or inaccurate, you may request its amendment.

How you can make a privacy complaint If you believe that your privacy has been breached,

please contact us using the contact information below and provide details of the incident so that we can investigate it. We request that all complaints be made in writing, so that we can be sure about the details of the complaint. We will treat your complaint confidentially, investigate your complaint and aim to resolve your complaint within a reasonable time.

At any time if you believe we have not dealt with your concerns, you can contact the Telecommunications Industry Ombudsman (TIO) for assistance. The TIO is a free, independence service that helps with phone and internet complaints. The TIO may be able to assist you where you are unhappy with the information we have given you, the time it takes for us to respond, or the way we respond.

To find out more about how the TIO can assist you

- Phone: 1800 062 058
- Email: [tio@tio.com.au](mailto:tio@tio.com.au)
- Webpage: [www.tio.com.au](http://www.tio.com.au)

### Credit reporting

In providing our services to you, we may need to check your credit worthiness or assess your credit situation. This may require us to collect credit-related information from or provide personal and credit-related information to credit reporting bodies.

Credit-related 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), and can include:

- identification information;

- current and historical details about credit applications you have made, credit arrangements you have entered into, and information requests made about you;
- information about overdue payments, default listings and about serious credit infringements and information about

payments or subsequent arrangements in relation to either of these;

- publicly available information relating to your credit standing (for example, bankruptcy and credit related court judgments); and
- credit scores or risk assessments indicating an assessment of your credit worthiness.
- Credit-related information may also include certain creditworthiness information that we have derived from the data that we receive from a credit reporting body. Sometimes we may collect this information about you from other credit providers,
- We may disclose your credit information to credit reporting bodies, who in turn may include it in credit reporting information they provide to other credit providers to assist them to assess your credit worthiness.

We may use or disclose your credit information for other purposes such as developing our credit assessment and credit worthiness rating system;

- processing credit-related applications and managing credit that we provide, including 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 or acting in connection with any securitisation or other financing arrangement;
- participating in the credit reporting system;
- dealing with complaints or regulatory matters relating to credit or credit reporting; and when required or authorised by law.

The credit reporting bodies that we may disclose your information to are illion Australia ([www.illion.com.au](http://www.illion.com.au)). You can find their contact details and how they manage your credit

### information on their website

You have the right to request credit reporting bodies not to use your credit eligibility information to determine your eligibility to receive direct marketing from credit providers; and use or disclose your credit eligibility information if you have been or are likely to be a victim of fraud. You have a right to obtain a copy of the credit reporting policies of any credit reporting bodies that we disclose your credit-related information to. If you would like to obtain a copy of any of these policies, you should contact the relevant credit reporting body directly using the contact details set out above.

#### Cookies and website analytics

To improve your experience on our website, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website.

Our website may contain links to other websites. Please be aware that those other websites will have their own privacy practices over which has no control and have no responsibility.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. By using our website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

Our website may also interface with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

#### Contact us

If you have any questions about this document, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact us on 1300 219 728 or [helpdesk@yless4u.com.au](mailto:helpdesk@yless4u.com.au).