



indigo

Privacy & Credit Reporting Policy

**AP Telecom Holdings Pty Ltd T/A
Indigo Internet**

Forward

This document outlines how AP Telecom Holdings Pty Ltd T/A indigo internet and its related bodies corporate handle the personal information they collect.

Personal Information

In the course of our normal business operations, we will collect personal information directly from you or from our systems. This information may include details about how you use our services. Sometimes we will collect personal information from a third party if you have consented, or via channels which you would reasonably expect us to, such as publicly available resources such as websites, telephone directories, social media or from third party providers such as nbn, Opticomm/Uniti or third party contractors or entities responsible for service delivery/service assurance.

We do not collect personal information about you by simply browsing our website, however if you choose to use one of our tools such as service qualifiers, service applications, contact forms etc, your personal information will be collected and stored in our systems for direct marketing purposes.

What kind of information do we collect?

If you are a customer, we will collect:

1. Contact information, such as names, email addresses, mailing addresses and telephone numbers.
2. Demographic information such as age and gender.
3. Billing and payment information.
4. Preferences about how you wish to be contacted.
5. Service assurance history, including troubleshooting/fault history.

If you are not our customer, we collect:

6. Contact information, such as names, email addresses, mailing addresses and telephone numbers.
7. Demographic information such as age and gender.

How do we use your personal information?

If you are a customer, we will use your personal information for:

1. Providing you with the service you have requested (for the purposes of filling orders, scheduling appointments, sending invoices etc.)
2. Sending marketing materials, newsletters or status updates.
3. Conducting research and analysis.
4. Complying with applicable laws, codes and standards.
5. Assisting law enforcement agencies and emergency services.

If you are not our customer, we will use your personal information for:

1. Sending marketing communications such as emails, or making telephone calls.
2. Other marketing communications via external (third party) marketing platforms.

You have the right to opt-out of receiving marketing communications from us at any time. You do not need to provide a reason for opting out and we will never request one.

From time to time, we may use non-identifiable or anonymised data in order to improve our services.

Sharing your information with third parties.

From time to time, we may be required to share your personal information with third parties in order to supply, improve or troubleshoot services, such as to install, maintain or manage your service, fix technical faults, track delivery of equipment or for customer research. Other than these instances, we will never share your personal information unless:

1. You have consented.
2. You would reasonably expect us to.
3. We are required to do by law.
4. It will prevent, abate or lessen a serious and imminent threat to someone's life, health or property.
5. The disclosure is reasonably necessary for law enforcement or for the protection of public safety.

AP Telecom Holdings holds the view that many components of the Telecommunications Act, including but not limited to metadata retention and lawful interception are overreaching and pose significant threat to freedom of expression.

Unfortunately, we are obligated by law to comply with the relevant legislation in this regard – we will, however, make every effort to ensure that any disclosure we are required to make is as limited in scope as possible whilst still complying with our legislative or regulatory obligations.

We use third party service providers which are located overseas and your personal information may therefore be disclosed to one of these overseas service providers. We use service providers located in the United States and European Union, which are subject to the respective privacy laws in those jurisdictions.

Information Security

When we collect personal information from you, we follow industry standards to prevent inadvertent disclosure or interception, both in transit and when it is stored in our systems.

Where we store your personal information, any staff who are able to access these systems are aware of their obligations to protect your privacy and may not disclose, use or view your personal information without a reasonable requirement to do so.

No method of storing or transmitting digital information is 100% secure and we cannot guarantee absolute security of your personal information. If you have any questions surrounding how your information is stored or transmitted, or any questions surrounding our privacy policy, please reach out to us at hello@indigointernet.com.au.

Controlling your personal information

At any time you can contact us to request information about what personal information we hold about you, either by calling us or emailing us.

You cannot opt-out of receiving operational correspondence (such as outage notifications or invoices), however you may choose to opt-out of non-operational correspondence by following the

unsubscribe instructions located on that correspondence.

Legislative Obligations

AP Telecom Holdings t/a indigo internet is bound by its obligations set forth in the *Privacy Act 1988* (Commonwealth).

This policy was last updated in March 2023.

Credit Reporting

We may collect information about you from and disclose your personal information to credit reporting bodies in connection with your application for products or service or in your other interactions with us.

Credit reporting bodies may include or disclose your personal information to us or to other third party entities in order to assist credit providers (such as AP Telecom Holdings) in assessing your credit worthiness. For example, if you fail to meet your payment obligations to us, or you commit a serious credit infringement in relation to credit for our products or services, we may be entitled to disclose this information to credit reporting bodies. We may collect information about your credit worthiness or to establish your eligibility for consumer credit from a credit reporting body.

We protect any information about your credit or credit eligibility with the same stringent controls we would use to protect your other personal information.

The information we collect, store and disclose surrounding your credit and credit eligibility can include:

1. Information about your identity
2. Information requests to credit reporting bodies.
3. Credit applications and arrangements.
4. Details about default listings, overdue payments or serious credit infringements and any subsequent payments or arrangements.
5. Bankruptcy or credit related court proceedings and other publicly available information.
6. Credit scores, risk assessments and credit worthiness.

We may use or disclose information about your credit to:

1. Process applications and manage credit
2. Develop our credit rating systems.
3. Assist you in avoiding default and to assess or manage a financial hardship application.
4. Collect debts from you.
5. Deal with serious credit infringements.
6. Deal with complaints.
7. Deal with regulatory matters where required or authorised by law.
8. Assign debts
9. Adhere to our credit reporting obligations.

You have a right to request credit reporting bodies to not use credit reporting information about you for pre-screening of direct marketing by a credit provider. You can also request credit reporting bodies to not use or disclose credit reporting information about you if you have a reason to believe you are a victim of fraud.

We use the following credit reporting agency for credit assessment and management:

Equifax Australian Group Pty Ltd

Telephone: 138 332

Address: Equifax Australian Group Pty Ltd
PO Box 964 North Sydney NSW 2059

Email: membership.query@veda.com.au

Website: www.mycreditfile.com.au/

A credit reporting body is required to have a policy which explains how they will manage your credit related personal information. You can view the policy credit at the link above.