

## **INTERFREE PTY LTD PRIVACY POLICY STATEMENT**

This Privacy Policy sets out the policy of Interfree Pty Ltd ('we' or 'us' or 'Interfree') with respect to the way we obtain, use and disclose information about you, including through our website at [www.interfree.com.au](http://www.interfree.com.au). We adopt and are bound by the Australian Privacy Principles ('APPs') contained in *Privacy Act 1988* (Cth) ('the Act').

We understand and appreciate that you are concerned about privacy, particularly in relation to the use and disclosure of Personal Information. We are committed to providing a high level of privacy in relation to all Personal that is collected by us.

This Privacy Policy covers Personal Information collected, used and disclosed by us about you, if you are one of the following:

- a customer;
- a supplier engaged by us;
- an independent contractor or an employment applicant; and
- an employee, except where the use or disclosure is directly related to the relationship between us as employer and you as the employee and relates to an "employee record" about you as a present or past employee.

### **What are Personal Information and Sensitive Information?**

"Personal Information" is information or an opinion about you as an identified individual or an individual who is reasonably identifiable, whether or not the information or opinion is true and whether or not it is recorded in a material form.

"Sensitive Information" is information about an individual's health (including predictive genetic information), racial or ethnic origin, political opinions, membership of a political association, professional or trade association or trade union, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices, criminal record, biometric information that is to be used for certain purposes and biometric templates.

### **What Personal or Sensitive Information do we collect from you?**

The types of Personal Information collected by us may differ, depending on whether you are, or would like to become, a customer, supplier, employee or independent contractor.

Generally, the Personal Information collected by us includes your name, address, telephone numbers, and email address. From our suppliers, we require bank account details.

If you are a customer, we collect your credit card details and information about your usage of household appliances and electricity.

From our employees and/or prospective employees, we collect several types of information, including, but not limited to, employment status, gender, bank account details, emergency contact details, qualifications, previous employment details, medical and health information, leave summaries, wages and salary information, date of birth, superannuation information, tax file numbers, where relevant visa and immigration information and information relating to performance and conduct.

We do not otherwise collect Sensitive Information.

In some circumstances, you may deal with us anonymously or using a pseudonym. However, in most circumstances it is impracticable to do so because if you do not provide us with the Personal

Information that we require or if you provide it in a way that does not identify you, we are likely to be unable to provide the services requested by you.

### **How do we collect your Personal Information?**

We collect Personal Information in a number of ways, including:

- from you when you make a general or specific telephone or online enquiry or purchase our goods and services;
- from you when you provide us with information, for example, via application forms, feedback forms, when you subscribe to our newsletter or other electronic direct mail, when you sign up for our App;
- by visiting any website or social media site established by us, including but not limited to Facebook, Twitter, Pinterest, Instagram, TikTok, Snap Chat, Youtube and Linked In ("Social Media Sites")
- from third parties;
- from publicly available sources of information; and
- from our own records.

When you look at our website, we may use tracking technologies such as cookies to make a record of your visit by logging your internet protocol address, the date and time of your visit to our site, the pages that you have accessed and the type of browser you were using. We use these for statistical purposes and for the purposes of marketing and advertising to you. This type of statistical information and cookies do not identify you. Most web browsers are set to accept tracking technologies such as cookies. If you do not wish to receive any cookies you may set your browser to refuse them. However, your use of our website may be affected.

### **How do we use your Personal Information?**

The primary purpose for which your Personal Information will be used is to enable us to provide you with the goods and services you have requested.

This includes:

- enabling us to provide install and monitor usage of products purchased by you including enabling us to report to you in relation to your usage of appliances and electricity;
- providing quality assurance for our goods and services;
- responding to your enquiries and feedback regarding our business, our goods and services;
- monitoring the performance of our business, our contractors and employees, our products;
- marketing including email marketing, promotional and educative activities;
- enforcing the terms and conditions of our engagement with you;
- for the management of our database; and
- ensuring compliance with statutory obligations.

We use and disclose information we hold about you as an employee of or incidental to our role as your employer and in accordance with applicable laws.

### **Direct Marketing**

We from time to time, communicate with you directly to promote our products or services. On each communication, we will advise how you may unsubscribe or opt out of receiving such communications. You may, at any time, request not to receive direct marketing communications from us and we will comply with that request.

### **How is your Personal Information disclosed?**

We do not and will not rent, sell or otherwise disclose your Personal Information to any other company or organisation, without your prior consent, where that consent is required by law.

You do, however, consent to our collection, use and disclosure of your Personal Information in the following ways:

- disclosure of your Personal Information including information regarding your usage of electrical appliances and electricity to third parties such as electricity providers and manufacturers or suppliers of electrical appliances;
- to third party consultants who may from time to time manage all or part of our database or computer systems or internet sites;
- to third parties where we outsource any of our functions, including but not limited to development, production and/or printing of advertising and marketing material and campaigns, including where such material contains photos or video of individuals; and customer satisfaction surveys;
- of or incidental to a sale of all or part of our business, to prospective purchasers and their legal and accounting representatives; and
- as required by law.

### **Cross Border Disclosure**

We do not actively disclose your Personal Information overseas. As our business grows, we may use some programs, software, online tools or Social Media Sites that may be based in and/or housed overseas. Our use of such products may involve disclosure of your Personal Information to such organisations overseas. In using such products, to the extent possible, we will take all reasonable steps to ensure all privacy settings are set to the highest possible level of confidentiality and privacy. However, use and disclosure of your Personal Information by such overseas organisations is generally in accordance with the terms and conditions and privacy policies of such organisations. The table below shows the main products we currently use (which may change from time to time).

<b>Product / website</b>	<b>Country of disclosure</b>	<b>Link to Privacy Policy</b>
Google or Google home	USA & other countries	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

Microsoft 365	USA, Ireland and other countries in which Microsoft or its affiliates operate	<a href="https://privacy.microsoft.com/en-US/privacystatement">https://privacy.microsoft.com/en-US/privacystatement</a>
Amazon	USA and other countries	<a href="https://www.amazon.com/b/?node=19149155011">https://www.amazon.com/b/?node=19149155011</a> ; <a href="https://www.amazon.com.au/gp/help/customer/display.html?nodeId=201374350">https://www.amazon.com.au/gp/help/customer/display.html?nodeId=201374350</a> <a href="https://www.alexa.com/help/privacy">https://www.alexa.com/help/privacy</a>
Apple - Siri	USA and other countries	<a href="https://support.apple.com/en-us/HT210657">https://support.apple.com/en-us/HT210657</a> ; <a href="https://www.apple.com/privacy/">https://www.apple.com/privacy/</a> <a href="https://www.apple.com/legal/privacy/en-ww/">https://www.apple.com/legal/privacy/en-ww/</a>
Home Assistant	Each country in which its employees, contractors and affiliates are located	<a href="https://www.home-assistant.io/privacy/">https://www.home-assistant.io/privacy/</a>

## Security

We are committed to ensuring the security of your Personal Information and we will take all reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure, including:

- having a robust physical security of our premises and databases/records;
- taking measures to restrict access to personnel who need that information in order for us to be able to provide our products and services; and
- technological measures, such as computer passwords, data back-up, anti-virus software and firewalls.

We will take all reasonable steps to ensure your Personal Information is accurate and kept up-to-date and complete and is relevant for the purposes for which it may be used pursuant to this Privacy Policy.

Please note that our website does not provide systems for secure transmission of Personal Information across the internet, except where otherwise indicated. When emailing or providing Personal Information to us via our website, please be aware that there are risks involved in transmitting Personal Information via the internet. Our website may contain links to other websites. We have no control over the privacy practices employed at other websites and we accept no responsibility for Personal Information provided via unsecured websites.

We cannot provide a guarantee with respect to the security of your Personal Information and we will not be liable for any breach of security or unintended loss or disclosure of information due to the website being linked to the internet.

## **How to check or change your details**

If you wish to view the Personal Information we hold about you, please send your request to our Privacy Officer by email or mail using the contact details at the end of this Privacy Policy. A fee may apply for such access. If we deny your request for access, we will let you know why.

If you wish to amend the Personal Information because it is inaccurate, out of date, incomplete, irrelevant or misleading, or if you wish your Personal Information to be deleted, please contact our Privacy Officer. If we refuse to comply with your request, we will let you know why.

## **Changes to our Privacy Policy**

From time to time we may decide to amend or update this Privacy Policy. When this occurs, we will post the new version of the Privacy Policy on our website. We encourage you to periodically review this Privacy Policy so that you remain informed as to how we are protecting your Personal Information.

## **Complaints**

If you believe that we have not complied with our obligations pursuant to the Act, or have a complaint about the use or disclosure of your Personal or Sensitive Information by us or any of our franchisees, please contact our Privacy Officer. We will discuss your concerns with you and take action as necessary to address such concerns which may include contacting us to take the matter further.

We will endeavour to resolve your complaint as soon as possible. However, the length of time will depend on the nature and complexity of the issues you have raised.

You will receive an acknowledgement of receipt of the complaint from us within 5 business days. We will give you an estimate of how long it may take us to deal with the matter but we will endeavour to finalise the matter within 30 days.

If we decide that your complaint is justified, we will then decide what action we should take in response. We will always try to match our response to the nature of your complaint and your desired outcome, but this may not always be possible.

Some of the things that we may decide to do include:

- take steps to rectify the problem or issue you have raised;
- provide you with additional information or advice so that you can understand what happened and how we have dealt with it;
- take steps to change our policies or procedures if your complaint identifies a problem in the way we are doing things.

It will not always be possible to resolve a complaint to everyone's satisfaction. In that case, you might want to escalate the matter to the Privacy Commissioner via an online privacy complaint form which can be found at: <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>. We welcome your questions and comments regarding this Privacy Policy.

## **Contact Details**

Interfree Pty Ltd  
Privacy Officer: Moe Chaudhry  
Address: 33 Glenvale Crescent, Mulgrave, Victoria, 3170  
Telephone: 03 9239 2099  
Email: [privacy@interfree.com.au](mailto:privacy@interfree.com.au)