

## Why We Collect, Use and Disclose Personal Information

We collect personal information from you and in relation to your activities when it is reasonably necessary for a business purpose.

This means we collect it to supply you with the products and services you have asked for, and to provide you with the best possible service.

Other reasons we collect personal information are to:

- Understand you, and how we can meet your needs now and in the future.
- Develop or evaluate products.
- Manage our business.
- Comply with our legal obligations.
- Provide listings in third party directories.
- Analyse usage and commercialise statistical information.
- Providing the service or product that you have requested.
- Keeping you as a customer.
- Selling other Bunnji services or products to you.
- Handling complaints or dealing with concerns.

## The Type of Information We Collect

Bunnji collects personal information like your name, address, date of birth, gender, occupation, interests, location, contact details, payment details (incl. credit card and account details where relevant), financial information, information about how and where you purchase and use our products and information about comments that people make online. We may collect and use a government identifier issued to you (e.g. your driver's licence number) to verify your identity.

We also collect and generate additional personal information about you, your actual and possible interests and preferences, based on your activities with us (e.g. information related to SMSs, calls, internet browsing, your use of our websites and apps, location).

## How we collect and hold personal information

We collect (and create) personal information in a few different ways, namely:

- We collect it straight from you, such as when you interact with us on social media, online, in-store or over the phone.
- We collect it from your device, such as when you use our apps, our website or our chat service.
- We collect it from your use of our network, such as when you browse the internet, make calls, or send texts that are routed through the Bunnji network.
- We collect it from Third Parties.
- We generate it in the course of our analytics work.

## Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association,

religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information and financial information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

## Credit Related Information

Bunji collects and uses personal information to verify your identity and assess your credit situation when you apply for some products and services. We might ask you for information about yourself and things like your personal details and credit history, and then seek a credit report from a credit reporting agency.

We'll always tell you before we seek a credit report, and we won't get one if you're under 18.

The credit report provided by a credit reporting agency may include information like your employment history, previous credit checks, any problems you've had paying bills and whether those issues were resolved. Bunji uses this information to assess whether we're entering into an arrangement that is sensible for both you and us.

Bunji works with customer service partners inside and outside Australia on credit related matters. Where necessary, we give our partners access to the credit information they need to help manage credit and your services.

You can ask the credit reporting agencies not to use or disclose the information in their files if you think you have been or are likely to become a victim of fraud.

Bunji doesn't use credit related information to generate marketing lists. Sometimes, we might ask a credit reporting body to do that for us. You can ask the credit reporting body not to use your information for these purposes by getting in touch with them directly.

In some circumstances, we may need to refer or sell overdue debts to debt collectors or other companies. If we do this, we'll give them secure access to the personal information they need to handle the debt. We may also update credit reporting bodies about some types of payment defaults, although we'll always tell you before we do this. We'll also always update them once payment has been made.

## Outsourcing and third parties

We work with third parties to provide some types of sales, business and customer support. They may have access to systems that include your personal information. These companies are subject to strict controls that protect your information from unauthorised use or disclosure, and limit their access to your personal information to the extent necessary to do their job.

We may choose to engage other people or businesses to provide services or products on our behalf. For instance:

- We may need to disclose information about you to our contractors or suppliers to enable delivery, provision, or installation of your device or service.
- If you lease a product from us, we may need to provide other companies with the personal information that they need to administer the lease.
- We provide access to your personal information to our outsourced contact centres (both calls and chat), sales agents, network support and technical support.

## Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 2 years.

## Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Bunji will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

## Legal obligations and other privacy exceptions

We give access to personal information where we are permitted or obliged to do so by Australian law. For example, in some circumstances we will use or disclose personal information to react to unlawful activity, serious misconduct, or to reduce or prevent a serious threat to life, health or safety. We are obliged to cooperate with law enforcement bodies in some circumstances. We may disclose personal information when we receive an access request or warrant that is authorised under Australian law.

Every major Australian telco and internet service provider is required to capture and store customer's "metadata" for a minimum of two years under the Australian Federal Government's mandatory data scheme. The legislation passed Parliament in March 2015.

### **We are required to store the following information or "metadata"-**

- Your name, address, and billing information
- Your phone number or email, and the phone number or email of the person you're communicating with
- The time, date and duration of a communication
- Your IP address
- The location of the communication equipment you use; for example, the closest cell tower
- The type of communication; phone call, text, or email

- Bandwidth usage such as the amount of data uploaded and downloaded

### **Who can access this data?**

Government agencies involved in criminal law-enforcement have warrantless access to the data stored under the mandatory data retention scheme:

- Australian Federal Police
- A police force of a state
- Australian Commission for Law Enforcement Integrity
- Australian Criminal Intelligence Commission
- subject to subsection (1A), the Immigration and Border Protection Department
- Australian Securities and Investments Commission
- Australian Competition and Consumer Commission
- Independent Commission Against Corruption
- Police Integrity Commission
- Independent Broad-based Anti-corruption Commission
- Crime and Corruption Commission
- Corruption and Crime Commission
- Independent Commissioner Against Corruption
- Any authority or body for which a declaration is in force

## **Policy Updates**

This Policy may change from time to time and is available on our website.

## **Privacy Policy Complaints and Enquiries**

Bunnji

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## **Version**

This Policy was released on 1 July 2019