



# PROTECTING YOUR PRIVACY STATEMENT

As of 21 October 2019

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## **Our Privacy Commitment**

Privacy is an increasingly important thing in a world of telecommunications and technology. In order to provide our services to you, we need to collect, store, use and disclose a broad range of information. We are committed to protecting your privacy, keeping your information safe and ensuring the security of your data.

## **Our Privacy Statement**

Our Privacy Statement explains how we collect, use and protect your information. It extends to both our control and processing of personal information. This current policy came into effect at 21 October 2019.

## **What information do we collect?**

The types of information we collect depends on how you use our products and services as well as the relationship we have with you as a customer. This can include straightforward information like your name, date of birth, contact details (including address, email address, phone number or mobile telephone number), occupation, driver's licence or passport number, and financial information (such as credit card or bank account numbers).

We may also collect more in-depth information including:

- **Financial Information** related to your financial relationship with us, such as your payment history and service history.
- **Information about your products and services** including device-specific information such as your hardware model, operating system version, unique device and service identifiers, device status, serial numbers, settings, configuration and software and mobile network information.
- **Information about how you use your products and services** such as your network usage including time and duration of your communications as well as information about the operation of the equipment, services and applications you use on our networks
- **How you use our services to access the internet** such as information about websites visited, your location or the location of your devices when you are using our products and services.

We may collect some forms of sensitive information:

Sensitive information includes information about a person's race, ethnic origin, political opinions, health, religious or philosophical beliefs and criminal history. We are subject to strict requirements in relation to sensitive information including to only collect and use sensitive information with consent or otherwise in accordance with applicable law such as the Commonwealth Privacy Act 1988.

You might also need to provide personal information about other individuals to us (e.g. about your authorised representative). If so, we rely on you to have informed those individuals that you are giving their personal information to us and to have advised them about this statement.

It is important to be aware that if you access another party's website or application using one of our products, that other party will deal with your personal information in accordance with its own privacy policy.

### How do we collect your information?

There are three ways that we can collect your information.

1. **You give it to us** when you or your representative interacts with either us or one of our trusted partners. This might happen when you are setting up an account with us or using one of our products or services.
2. **We collect information** when you use our networks, products and services including our call centres and online services. For example, we may use network tools to collect your call records, collect wireless device locations from our networks and your devices or use cookies and other technologies to identify your unique web browser.
3. **We obtain information from outside sources** marketing mailing lists, and public information, (including public posts to social networking sites) and commercially available personal, identity, geographic and demographic information. This can also include information gained from our partners if you have interacted with them. These partners include our business and commercial partners, identity and fraud checking services, credit reporting bodies and wholesale and other customers.

We understand that you might not want to give us personal information. If so, that may mean we are not able to provide you with the products or services you need.

### How do we keep your information?

- We may store your information in hard copy or electronic format and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers.
- We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure.
- We endeavour to ensure that personal information is kept as current as possible and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. However, some personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

### How do we use your information?

We will only use your information if we have a lawful reason to do so such as when it's our legal duty or we have your consent and when it's in our legitimate interest to do so.

These include:

- **Administration** - To help us properly manage the products and services we provide to you and to maintain and update our records. For example, we need to be able to verify your identity to detect, prevent and address fraud. We also use your information for charging and billing and to identify breaches of our terms and conditions of service.
- **Network, security and fraud protection** – As part of our network protection activities, we monitor Domain Name Servers (DNS) for known malicious domains which can, amongst other things, lead to the downloading of malicious software on to devices. Where Flash Fibres' DNS services are used to connect to these known malicious domains, we may identify impacted customers for the purposes of notifying them so they can act to protect themselves.
- **Communication** – We need to be able to communicate with you in order to provide you with our products and services. We might do this on mediums such as email, SMS, social media, search engines and web pages you may visit.
- **Improvement** – We are constantly working to not only maintain and improve our products, services and processes but to develop new ones. We use information we hold to help us do this in several ways. For example, to monitor network use, quality and performance, and to operate, maintain, develop, test and upgrade our systems and infrastructure. We may also combine information from one service with

information from one of our partners' services to improve our credit assessment and debt recovery processes.

- **Development and analysis** – It's important we understand your information and communication needs. One of the ways we do this is through using analysis and business intelligence techniques. This gives us high level insights into things like usage patterns, network performance, demographic trends and other types of behavioural data. In many cases this information is aggregated and de-identified when analysed. We may share these anonymised insights with select business and commercial partners. In some cases, we may create insights with your information on an identified basis but would only do so in compliance with privacy laws (such as, with your consent).
- **Direct marketing** – We want to make sure that you know about all our products, services and special offers that are relevant and are of interest to you. We may use the information we hold to market and promote them directly to you. This also may include products, services and offers provided by our trusted partners. In some cases, this marketing activity can continue after you have stopped using our products or services, unless you opt-out. You can stop us using your information for direct marketing by responding to any marketing email or text message.
- **Compliance** – As required or authorised by legislation such as the Telecommunications Act 1997 (Cth) and the Telecommunications (Interception and Access) Act 1979 (Cth) including the data retention provisions)

#### **When do we share your information?**

We may share your information with other parties who provide services to us, including organisations, agents, partners and contractors that assist us with providing our business processes and products and services.

These services include:

- Providing, managing or administering your product or service including customer enquiries and support services
- Installation, maintenance and repair services
- Mailing operations, billing and debt-recovery functions
- Information technology and network services to develop our crime or misconduct identification
- Investigation and prevention services
- Market research, marketing development
- Analysis and business intelligence functions

#### **We may also disclose your information to:**

- Your authorised representatives or advisers, other parties when you ask us to do so or when you consent to that disclosure for the purposes of fraud, crime or misconduct identification, investigation and prevention services.
- Other telecommunication and information service providers or to our wholesale and other customer customers from whom you may acquire products or services
- Parties that assist us with fraud and identity checking including financial institutions and the Government's National Document Verification Service, to verify the validity of any Government issued documentation you provide as proof of identity, for example to check a Driver's License, Medicare, Passport etc.
- Law enforcement and national security agencies, and other government and regulatory authorities as required or authorised by law
- Other parties who assist us in managing or developing our business and corporate strategies and functions, including our corporate risk or funding functions
- Financiers, investors or other participants and parties (such as service providers and ratings agencies) and advisers involved in any sale of our debts, securitisation or other financing arrangement (for example, a sale of amounts payable by you to Flash Fibres)
- Other parties as required by or in accordance with any industry code or industry standard registered under the Telecommunications Act 1997 (Cth)
- For the purpose of facilitating or implementing a transfer/sale of all or part of our assets or business.

### **How can you access or correct your personal information?**

To ensure that we can provide you with the best products and services possible, it's important that you make sure the personal information we hold about you is accurate, up-to-date and complete. If any of your details change, you may contact us using the contact details below (find them in the how to contact us section) so that we can consider and respond to your request.

You also have the right to request a copy of your information that we hold about you. There is no charge to submit a request or to correct information, however we may apply an administrative charge for providing access to your personal information on request. To make this request email [admin@flashfibres.com.au](mailto:admin@flashfibres.com.au)

### **How can you make a privacy complaint?**

You can also use our contact details to notify us of any privacy complaint you have against us. We are committed to acknowledging your complaint in a prompt manner and will give you an estimated timeframe for when we will respond to your complaint.

We will aim to investigate and resolve your complaint within 30 days of receiving it. If we need more time, we will notify you about the reasons for the delay and indicate a new estimate time frame. While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, you may also be able to lodge a complaint with a relevant regulator such as the Australian Information Commissioner or the Telecommunications Industry Ombudsman.

### **How can you contact us?**

If you have any questions in relation to this Privacy Statement, our management of your information or you would like a copy of this statement sent to you, please call us on 07 5438 0003 or email us at [admin@flashfibres.com.au](mailto:admin@flashfibres.com.au)

