

Privacy and Credit Reporting Policy

Localvolts - Anyone can be an Energy Farmer

Version 1.2
6 August 2021



Privacy and Credit Reporting Policy

Introduction

This policy describes how Localvolts Pty Ltd and its related companies manage personal information and credit related information.

Personal information is information or an opinion about an identified or reasonably identifiable individual, whether the information or opinion is true and whether the information is recorded in a material form. Credit-related information is information about how you manage your credit, the credit that you have applied for or obtained, your payment history and creditworthiness and the information contained in your credit file.

We will review and update this policy from time to time as needed without notice. Therefore, you should review the terms of this policy periodically to make sure that you are aware of how we collect, hold, store and use personal information and credit related information.

Types of Information that we collect and hold

We collect and hold personal information and credit related information about individuals for the provision of our products and services and purposes connected to those products and services.

The information we collect can include:

- **Contact data:** your name, email address, postal address, phone number, date of birth and any other relevant information we need to contact or identify you;
- **Technical data:** internet protocol (IP) address, your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **Usage data:** information about how you use our website, products and services;
- **Energy supply data:** your usage and export data, expenditures and earnings and preferences. We also keep information about your facilities including details of generators and storage;
- **Credit related information:** your credit history, details of credit you have sought or obtained, credit rating or assessments, and details of credit related court proceedings; and
- **Other data:** concession data, if applicable.

We use cookies on our website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use 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 the website.

Where we need your sensitive information, such as information about your health or ethnicity (for example, to ensure continuous service to your property or to assist with translation services), we'll ask for your permission to collect this information — except where otherwise allowed by law.



If you don't provide us with personal information, we are unlikely able to provide you with our services.

How we collect and hold information

We will collect certain personal information and credit related information from you during your sign-up journey when you get in contact with us, use our website or phone/tablet App or as part of providing our services to you. We may monitor and record any communications we have with you, including phone calls, live chats and emails, to make sure we are providing you with the best service we can. We may also collect personal information and credit related information about you from third parties, including your authorised representative, our agents or other third parties.

We take steps to protect the personal information and credit related information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. For example, we have implemented technology controls and organisational processes to assist us to protect your personal information and credit related information, including having in place confidentiality obligations for employees and contractors, as well as implementing document storage security policies, systems and site access restrictions.

Our websites have security systems in place, including the use of firewalls and data encryption. We also take care to store your information in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

We keep the personal information and credit related information we collect for no longer than is necessary for the purposes for which we collected it. The length of time depends on the purpose for which we use it or otherwise meet our legal obligations. We will delete any information as soon as we no longer have a valid reason to hold it.

Use of Information

We will not use or disclose personal information for any secondary purpose, unless that secondary purpose is related to the primary purpose for which we have collected that information, and you would reasonably expect the disclosure in the circumstances, or unless you consent to that use or disclosure.

We are operating a transparent energy marketplace which involves disclosing customer details on the marketplace, with information such as names, facility names and locations (limited to state/town/postcode), offer/buy prices and volumes, etc.

We hold, use and disclose personal information and credit related information for a variety of purposes to effectively conduct our business, including to:

- operating our marketplace;
- supply our customers with products and services, including but not limited to energy products, use management tools, and to administer and manage the supply of products and services (including billing and collecting of debts);
- provide our customers and prospective customers with information about us, products and services, products and services offered by our related entities, including how use of our products or services can be improved;



- help us decide whether to provide or continue to provide products or services, assess applications you make for credit, collect payment that you owe us, and respond to any access or correction requests;
- understand and analyse our customers' energy needs, usage and consumption;
- to verify our customers' and prospective customers' identity and help ensure our customer records are current and accurate;
- identify customers that might be suitable candidates for certain pilot and trial programs;
- customise your user experience on our website and other online services;
- conduct research and development (including surveys) to improve our products and offerings;
- conduct appropriate checks for credit-worthiness and for fraud for customers who have credit with us;
- comply with our legal and regulatory obligations;
- manage our relationships with our suppliers and stakeholders; and
- to consider job applicants for current and future employment.

To help us carry out activities, from time to time we may disclose your personal information and credit related information to other persons including:

- our contractors, suppliers, agents, related entities and partners who assist us to provide products and services and to administer, manage and improve our business;;
- service providers who provide installation, maintenance, meter reading and other services related to metering;
- relevant loyalty and rewards program partners;
- consumer finance providers;
- corporate finance and banking providers;
- credit reporting bodies;
- organisations with whom we have commercial arrangements;
- government and regulatory authorities (as required or authorised by law);
- our professional advisors (such as auditors and lawyers); and
- organisations that assist us to conduct research or analyse data, including undertaking customer segmentation for marketing purposes.

We may use aggregated data that has been anonymised, to improve operations and ensure we are providing you with the best service possible. We also anonymise personal information in accordance with our domestic violence policy.

Overseas disclosure

We may disclose your personal information to recipients which are located outside Australia. Those recipients are likely to be located in Canada, the European Union, Singapore, the United Kingdom, and the United States of America.

Marketing

We may use your personal information to provide you with information on products, services and offers (from us, our related companies or companies that we have partnered with) that we believe may be relevant to you or that you would be interested in, but we will not do so if you tell us not to.



You can opt out of receiving marketing at any time. You consent to us sending you the information by direct mail, email, telephone, mobile apps, social media and SMS/MMS, unless and until you tell us not to contact you in these ways:

- SMS or email marketing – click on the unsubscribe link or follow the instructions in the message you receive from us;
- Call us on +61 2 8006 8052 between the hours of Monday to Friday 9am to 5pm
- Or writing at Localvolts, PO Box 380, Manly NSW 1655

Access and correction

We will take all reasonable steps to ensure any personal data or credit related information we collect, use or disclose is up to date and accurate. If you believe personal information or credit related information we hold about you is not up to date or accurate, you may ask us to correct it.

You may ask us to provide you with details of the information we hold about you, and copies of that information. We will respond to your request and attempt to provide you with the information within 30 days of receipt of your request.

If we provide you with copies of the information you have requested, we may charge you a reasonable fee to cover the administrative costs of providing you with that information.

Please direct all request for access and correction to info@localvolts.com

Credit reporting

We may disclose your personal information and credit related information to credit reporting bodies. The credit reporting bodies we use include:

Equifax Australia (formerly Veda)
Website: equifax.com.au
GPO Box 964, North Sydney NSW 2059
Phone: 13 83 32

Illion (formerly Dun & Bradstreet)
Website: illion.com.au
PO Box 7405, St Kilda Rd, Melbourne VIC 3004
Phone: 13 23 33

Experian Australia
Website: experian.com.au
GPO Box 1969, North Sydney NSW 2060
Phone: 1300 783 684

CreditorWatch
Website: creditorwatch.com.au
GPO Box 276, Sydney NSW 2001



Phone: 1300 501 312

You have the right to request credit reporting bodies not to:

- Use your credit-related information to determine your eligibility to receive direct marketing from credit providers; and
- Use or disclose your credit-related information if you have been or are likely to be a victim of fraud.

If, after reasonable follow-up, you do not pay any outstanding amounts owed by you to us, you commit fraud or try to, or commit a serious credit infringement we may supply credit reporting bodies with this information along with relevant personal information. This may include:

- Identification information about you;
- the fact that you have applied for credit and we are a credit provider to you;
- advice about payments more than 60 days overdue which are 'in collection' that we are permitted to report to the credit reporting body; and
- that credit provided to you has been paid or otherwise discharged.

If we refuse a credit application based on information from a credit reporting body, we tell you and give you the name and contact details of that body and any other information we are required to give you.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation. We may notify any credit provider and credit reporting body to which we have disclosed your information to that you have made a complaint and the outcome of that complaint unless it is unlawful to do so.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

You can also contact your local Ombudsman at any time for advice or to make a complaint. The Ombudsman is independent, and their services are free. Please contact us if you would like the relevant contact details.

Contact us

You can contact us using the details below:

- to arrange access to or correction of, personal information about you
- request a hardcopy of this policy
- enquire generally about privacy matters (including in relation to credit)
- discuss any issues relating to this policy (including in relation to credit).



Phone: +61 8006 8052 Monday to Friday 9am to 5pm

Email: info@localvolts.com.au

Mail: Localvolts PO Box 380, Manly NSW 1655