

United Energy complies with the Privacy Act and the Australian Privacy Principles under the Privacy Act, and any other applicable laws that protect your privacy. The Australian Privacy Principles regulate United Energy's handling of Personal Information.

This Privacy Policy sets out United Energy's Personal Information handling practices.

1. Definitions

In this Privacy Policy:

Australian Privacy Principles refers to the principles contained in Schedule 1 of the Privacy Act.

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Primary Purpose means the purpose of carrying out United Energy's core functions and activities, which includes:

- (a) connection, disconnection or maintenance of the supply of electricity; and
- (b) provision of metering services or any other services which are offered or provided by United Energy.

Privacy Act means the *Privacy Act 1988* (Cth).

Secondary Purpose means a purpose other than the Primary Purpose of collection. This may include: insurance, marketing, investigations, managing network issues, business planning and notifying customers of United Energy's services.

Sensitive Information means:

- (a) Personal Information which comprises information or an opinion about an individual's:
 - i. racial or ethnic origin;
 - ii. political opinions;
 - iii. membership of a political association;
 - iv. religious beliefs or affiliations;
 - v. philosophical beliefs;
 - vi. membership of a professional or trade association;
 - vii. membership of a trade union;
 - viii. sexual orientation or practices;
 - ix. criminal record;
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

United Energy means United Energy Distribution Pty Ltd, its related bodies corporate within the meaning of the *Corporations Act 2001* (Cth) and UE & Multinet Pty Ltd.

2. Purpose, kinds and collection of Personal Information

The types of Personal Information we collect may include:

- **name;**
- **postal address and service address;**
- **phone number;**
- **email address;**
- **metering data and/or service information;**
- **transactional information (including any related financial details);**
- **details and information in relation to complaints;**
- **medical details in relation to the need for and use of electricity supply.**

United Energy will only collect Personal Information if the information is reasonably necessary for one or more of its functions and activities.

Where it is reasonable and practicable to do so, United Energy will collect Personal Information directly from you. We may collect Personal Information from you through our website, and when you communicate with us (either by email, telephone, in writing or in person).

Where United Energy collects Personal Information directly from you, United Energy will take steps which are reasonable in the circumstances to ensure that you are aware of:

- our corporate and contact details;
- your ability to gain access to the information;
- the purposes for which the information is collected;
- the organisations (or types of organisations) to which United Energy usually discloses information of that kind;
- any law that requires the particular information to be collected; and
- the main consequences (if any) for you if all or part of the information is not provided.

You are not required to provide Personal Information to us. However if you do not provide us with all the Personal Information we request, we may not be able to supply services to you or the services we provide to you may be detrimentally affected.

There are situations in which we may collect Personal Information about you from a third party, for example, your energy retailer. We handle all Personal Information (including Sensitive Information) collected from third parties about you in accordance with this Privacy Policy.

In certain circumstances, United Energy may collect Sensitive Information where it is necessary to achieve a Primary Purpose, or a Secondary Purpose which is directly related to the Primary Purpose. For example, we may collect certain health information to assist in meeting your special requirements in supplying electricity to you.

3. Use and disclosure of Personal Information

United Energy will only use and disclose your Personal Information for either:

- (a) the Primary Purpose; or
- (b) a Secondary Purpose where either you have expressly consented to such use or disclosure, or it is related to the Primary Purpose of collection and you would reasonably expect such use or disclosure.

United Energy may use or disclose Personal Information to related or unrelated third parties for such purposes, including the following:

- our service providers who assist us in providing our services; and
- electricity retailers and other electricity market participants (such as the Australian Energy Market Operator (AEMO)) to ensure they have sufficient information for billing customers.

We may use or disclose your Personal Information where required or authorised by law, which may include emergency situations and assisting law enforcement agencies.

We will not use your Personal Information for marketing purposes where you have requested that you do not wish it to be used in this way.

We may use your Personal Information to promote and market products and services to you, including through telephone and electronic methods such as email, SMS and websites. This is to keep you informed of products, services and special offers and may continue after you cease to acquire services from us.

Unless you have opted out, we may provide marketing communications to you. If you do not wish us to contact you to promote and market products, services and special offers (whether it be through electronic methods or otherwise), or if you have subscribed to any of our newsletters or subscriptions and no longer wish to receive such communications, please contact us using the "Contact Details" set out in Section 11 below.

In circumstances where United Energy receives unsolicited Personal Information, and the information is not contained in a Commonwealth record, United Energy will as soon as practicable destroy or de-identify the information.

4. Storage, information quality and security

United Energy may store some Personal Information with a third party data storage provider. We will take reasonable steps to protect the Personal Information it holds from misuse, interference, loss and from unauthorised access, modification or disclosure. To the extent required by the Privacy Act reasonable steps will be taken to make sure that Personal Information we collect, use and disclose is accurate, complete and up to date.

5. Destruction or de-identification

We will take reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for a Primary Purpose or Secondary Purpose in accordance with the Privacy Act.

6. Anonymity

United Energy will generally provide individuals with the option of not identifying themselves when entering transactions when it is lawful and practicable to do so. However, on many occasions we will not be able to do this. For example, we will need your name and address in order to provide you with electricity connection.

7. Accessing and updating your Personal Information

If you need to access or update any Personal Information we hold about you, please contact us using the "Contact Details" set out in Section 11 below. We request that you provide us with as much detail as you can about the particular Personal Information you seek to access or update, in order to help us retrieve it. An administration fee may be charged to cover our costs of providing access to that Personal Information to you.

In certain circumstances, we may not be able to provide you with access to your Personal Information. For example, where providing access would be unlawful, pose a serious and imminent threat to the life or health of any individual, would have an unreasonable impact upon the privacy of other individuals or where the request for access is frivolous or vexatious. If we do not provide you access to your Personal Information, we will give you our reasons for that decision.

8. Cross-border disclosure of Personal Information

United Energy will only disclose Personal Information about an individual to a third party in a foreign country in accordance with the Privacy Act. Some of the countries that our third parties operate in may include India, the Philippines, Singapore, Hong Kong, China, the United Kingdom, Bermuda and the USA. These third parties may have obligations under foreign laws that differ from Australian privacy laws however, we will take reasonable steps in the circumstances to ensure that the third party does not breach the Australian Privacy Principles unless we are not required to do so under the Privacy Act (such as where you have consented to the disclosure).

9. Smart Meters

Smart meters provide two-way communication between customers' electricity meters and United Energy (or its appointed data provider). Electricity meter readings will be recorded at regular intervals and will assist customers to better manage their energy consumption through greater visibility of usage patterns.

Information from smart meters may be disclosed to the occupier of the relevant premises or to a third party at the occupier's request. As set out above, United Energy may need to disclose your Personal Information to retailers and other market participants, such as AEMO.

United Energy has robust operational safeguards in place to ensure that any Personal Information in the context of smart meters is dealt with in accordance with the Australian Privacy Principles.

For example:

- all wireless links are encrypted and cannot be disabled;
- access to data from smart meters will be restricted, with security settings such as password protection;
- varying levels of encryption of data have been incorporated as well as digital certificates and intruder detection to make sure that only authorised users can gain access to the meters;
- mandatory security processes are in place, such as regular review of audit trails in line with meter data provider accreditation and regular audits undertaken by AEMO; and
- in home display devices are securely bound to the meter so that information can only flow to that device.

10. Complaint Process

If you have any concerns or wish to make a complaint about the way in which we have handled your Personal Information, please contact us at:

Privacy Officer
United Energy
43-45 Centreway, Mt Waverley, Vic 3149
(03) 8846 9900
privacy@ue.com.au

All complaints will be handled in line with our Customer complaint process available at

<https://www.unitedenergy.com.au/wp-content/uploads/2015/09/Detailed-UEMG-complaints-and-claims-procedure-20151.pdf>

Should your privacy concerns not be resolved to your satisfaction you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

11. Contact Details

If you have any questions in relation to privacy, or require any further information about United Energy's Privacy Policy, please contact us at:

Privacy Officer
United Energy
43-45 Centreway, Mt Waverley, Vic 3149
(03) 8846 9900
privacy@ue.com.au

12. Policy updates

We may amend this Privacy Policy from time to time. We will post the updated Privacy Policy to our website, and may include it in certain notices to you. Please check our website regularly for changes to this Privacy Policy.

Last updated: January 2018