

NATAN PTY LTD Privacy Policy

At NATAN Pty Ltd (NATAN), we aim to provide access to strong and consistent broadband internet and voice services to every member of the Australian population we can reach. We respect and protect the privacy of our customers and visitors to our website. This Privacy Policy describes how NATAN will collect and use personal information from customers in relation to the provision of our services to them.

NATAN have adopted and are committed to meeting the standards set out in the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, which together govern the way NATAN collects, stores, secures, uses, disclosures and disposes of personal information.

What is personal information and why does NATAN collect it?

The term "personal information" in this privacy policy has meaning given to it in the *Privacy Act 1988* (Cth). In general terms, it is any information from which your identity is apparent or can be reasonably ascertained. This may include your name, address, telephone number, email address, profession or occupation, credit card or bank details.

This personal information is obtained in many ways including application forms, correspondence, by telephone and/or facsimile, by email, via our website www.natan.com.au and from third parties.

What personal information does NATAN collect and hold?

NATAN may collect the following types of personal information about you:

- your name and contact details (such as address, email address, telephone and facsimile numbers);
- your age or birth date;
- your profession, occupation or job title;
- due diligence information about you and your business as part of our diligence process;
- details of the products and services that you have acquired from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website, social media sites or indirectly through use of our website or online presence, through our representatives or otherwise;
- if you are a job applicant, information that you submit to us as part of the job application process;
- if you are an employee or contractor, information relating to your engagement with us; and
- information you provide to us through our websites, customer service team, customer surveys, promotions or visits by our representatives from time to time.

We may also collect additional types of information from you, such as:

- information about your usage of our services to access the internet, network usage and performance and the operation of equipment, applications or services on our network;
- financial and credit information may also be collected from you, in relation to your financial relationship with us. Such information may include your income details, payment history, your credit history and your service history. For further details, please see the 'Credit Reporting' section below;
- information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website; and
- sensitive information (which includes information about things such 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). NATAN will use sensitive information 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 we are required or authorised by law to use or disclose that sensitive information.

If you need to provide personal information about other individuals to us (e.g. about your authorised representative), we will use that personal information in accordance with this Privacy Policy and will rely on you to have informed those individuals that you are giving their personal information to NATAN and to have advised them about this statement.

How does NATAN collect your personal information?

NATAN collects your personal information directly from you and from your use of our services. When collecting personal information from you, we may collect in ways including:

- through your access and use of our social media sites, or when you call or email us;
- during conversations between you and our representatives;
- when you complete an application, form or purchaser order; and
- when you use our networks, products or services including our customer service call centre and online services.

We may also collect personal information from third parties including:

- from third party companies such as law enforcement agencies and other government entities;
- from a credit reporting body; and
- from third parties who you have referred us to (for example, referees or authorised representatives).

What happens if NATAN can't collect your personal information?

If you do not provide us with particular personal information, we may not be able to provide you with the products or services you need.

For what purposes does NATAN collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of service to you. We collect, hold, use and disclose your personal information for the following purposes:

- to provide our products and services to you and to send communications requested by you;
- to consider, assess and process communications (including requests for services or complaints) received from you;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- to maintain our share register, manage share transactions and communicate with shareholders;
- for the administrative, marketing (including direct marketing), planning, product or service development, research purposes of us and our related bodies corporate, contractors or service providers;
- to update our records and keep your contact details up to date;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority; and
- to maintain our website.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy statement or permitted by law.

Who do NATAN disclose your information to?

We may disclose your personal information to:

- our employees, related bodies corporate, contractors or service providers for the purposes of operation of our business, our website, to satisfy the terms of our Customer Service Agreement with you, fulfilling requests by you, and to otherwise provide products and services to you (including, without limitation IT systems and network administrators, mailing houses, couriers, payment processors, data entry service providers, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants);
- comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority;
- service providers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- develop our credit assessment and credit worthiness rating system; and
- any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

We may also disclose your personal information to credit reporting bodies for identity checking and credit related purposes (such as credit rating or worthiness, default listing, credit provision and financing). For further details, please see the 'Credit Reporting' section below.

Does NATAN disclose your personal information to anyone outside Australia?

NATAN may, from time to time, disclose your personal information (in accordance with this Privacy Policy) to an organisation that may be based outside the location where your personal information is collected. For example, we may share your information with other parties in Australia, Canada, countries within the European Union, India, New Zealand, Philippines and the United States of America.

Where we do this, NATAN require these parties to take appropriate measures to protect that information and to restrict how they can use that information.

How can you access and correct your personal information?

It is an important part of providing our services to you that your personal information is up to date. You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you (we will let you know at the time of the request). We will not charge for simply making the request and will not charge for making any corrections to your personal information. As part of this request, we may need to verify your identity and provide this in writing to us.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We request that all complaints be made in writing, so that we can be sure about the details of the complaint. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Privacy Act 1988 (Cth), if applicable).

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

Credit Reporting

In providing our services to you, we may need to check your credit worthiness or assess your credit situation. This may require us to collect credit-related information from or provide personal and credit-related information to credit reporting bodies.

In this section, "credit-related information" means credit information, credit eligibility information and CRB derived information as those terms are defined in the Privacy Act 1988 (Cth). Credit-related information relates primarily to your dealings with other credit providers (for example, banks, other financial institutions, or other organisations that may provide you with credit in connection with their products or services), and can include:

- identification information;
- current and historical details about credit applications you have made, credit arrangements you have entered into and information requests made about you;
- information about overdue payments, default listings and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these;
- publicly available information relating to your credit standing (for example, bankruptcy and credit-related court judgments); and
- credit scores or risk assessments indicating an assessment of your credit worthiness.

Credit-related information may also include certain credit worthiness information that NATAN has derived from the data that we receive from a credit reporting body. Sometimes we may collect this information about you from other credit providers.

We may collect, use, hold and disclose credit-related information about you for the purposes of assessing your creditworthiness in connection with an application for credit that has been made to us. We may also obtain a credit

rating or credit assessment score about you from a credit reporting body and/or derive our own score, and then use this score in assessing your creditworthiness for the purposes listed in this policy.

We may collect credit-related information about you from the credit reporting bodies that we deal with (as specified below) and from other credit providers who have provided credit to you. We may use and hold this credit-related information in order to conduct a credit assessment on you and to decide whether to provide you with products and services on credit. We may disclose your credit information to credit reporting bodies, who in turn may include it in credit reporting information they provide to other credit providers to assist them to assess your credit worthiness.

We may disclose your credit-related information to our related companies and to third parties, including debt collectors, credit management agencies, other credit providers, credit reporting bodies and to government bodies and regulatory authorities (where required or authorised by law).

We may use or disclose your credit information for other purposes such as:

- developing our credit assessment and credit worthiness rating system;
- processing credit-related applications and managing credit that we provide, including assisting you to avoid defaults;
- collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements;
- assigning our debts or acting in connection with any securitisation or other financing arrangement;
- participating in the credit reporting system;
- dealing with complaints or regulatory matters relating to credit or credit reporting; and
- when required or authorised by another law.

The credit reporting bodies that we may disclose your information to are:

- Illion Australia (formerly trading as Dun and Bradstreet (Australia) Pty Ltd)

Telephone: 1300 734 806

Email: PACAustral@dnb.com.au

Website: www.checkyourcredit.com.au

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

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

You have a right to obtain a copy of the credit reporting policies of any credit reporting bodies that we disclose your credit-related information to. If you would like to obtain a copy of any of these policies, you should contact the relevant credit reporting body directly using the contact details set out above.

You also have a right to access the credit-related information that we hold about you, to correct that credit-related information and to make a complaint about our handling of your credit-related information. See the 'How can you access and correct your personal information?' section above, and the 'Contact us – Privacy Policy Enquiries' section below for information on how you can exercise these rights.

Direct marketing materials

NATAN may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We generally do not provide your personal information to other organisations for the purposes of their direct marketing.

Security and data quality

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

To help protect the privacy of data and personal information that we collect and hold, NATAN maintain physical, technical and administrative safeguards. NATAN's services are hosted in Australia in secure facilities that we own or operate, or are owned and operated by our service providers.

We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

Internet transmission

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk. We will, however, take reasonable steps to ensure your personal information that is collected by our website is protected from misuse and loss and from unauthorised access, modification or disclosure.

Cookies and Website Analytics

To improve your experience on NATAN's website, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of 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 this website.

Our website may contain links to other websites. Please be aware that those other websites will have their own privacy practices over which NATAN has no control and has no responsibility. When you go to other websites from NATAN's website, NATAN recommend that you read and be aware of their privacy policy. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

NATAN's website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. By using NATAN's website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

NATAN's website may also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

Contact us – Privacy Policy Enquiries

If you have any questions about his document, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Privacy Officer using the details set out below. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact us at:

NATAN Pty Ltd
512 / 36 King Street, Bowen Hills, QLD 4006
Phone: 07 3547 4877
Email: support@natan.com.au

Policy Updates

This privacy policy may change from time to time. Any updated versions will be published on www.natan.com.au