
PRIVACY POLICY
FOR
ALLUME ENERGY PTY LTD
REVISION A1

1 PRIVACY POLICY

- 1.1 **Allume Energy Pty Ltd (ACN 605 671 494)** is a business registered in Australia (the **Company**) and is committed to keeping your information safe and secure in accordance with the *Privacy Act 1988* (Cth) (the **Privacy Act**) and the Australian Privacy Principles contained therein and any applicable State or Territory law governing your privacy. By engaging the Company's services, portal or website (the **Services**), you are giving consent to the Company for the use of your private information in the manner set out in this Privacy Policy.

2 COLLECTION OF PERSONAL INFORMATION

- 2.1 The Company may collect and use the following kinds of information:
- (a) information about your use of the website or Services (including your IP address; browser type; version and language; operating system; pages viewed while browsing the website or Services; page access times; "cookies"; and referring website address);
 - (b) energy usage, details about your living situation, and your home; and
 - (c) information about your personal details (including name; phone contact details; address information; email; and payment information).
- 2.2 Information about your personal information may be collected from you in a variety of ways, including but not limited to:
- (a) when you register for the Services;
 - (b) when you interact with the Company electronically or in person;
 - (c) when you access the Company's website or Services;
 - (d) when you apply for a job or provide us services (as an employee or contractor);
 - (e) access our office or systems; and
 - (f) when the Company provides products and/or Services to you.

3 USE AND DISCLOSURE OF PERSONAL INFORMATION

- 3.1 The Company may use your personal information to:
- (a) enable your access to the website;
 - (b) track usage and measure traffic statistics of the website;
 - (c) supply to you the products and/or Services that you purchase or request as a customer;
 - (d) receive and/or access information from third party providers for the provision of our products and/or Services to you;
 - (e) contact you regarding your use of the products and/or Services offered by the Company;
 - (f) contact you in relation to comments, complaints, enquiries or dispute resolution;
 - (g) collect payments from you;
 - (h) to administer rewards, surveys, competitions or other promotional activities or events conducted, sponsored or managed by us or our business partners;

- (i) to enable you to participate in any loyalty or incentive programs that we operate;
- (j) to improve our goods and services;
- (k) to verify your identity, address and age or eligibility to participate in a marketing activity;
- (l) to consider you for a job with us (whether as an employee or contractor) or in the context of other relationships with us;
- (m) to address any issues or complaints that we or you have regarding our relationship;
- (n) communicate with third party providers or associate parties with respect to the provision of the Services; and
- (o) send you marketing communications.

3.2 The Company will not disclose personal information about you, unless it is required, incidental or otherwise related to the primary purpose of providing Services to you or a third party for which you have consented to by engaging the Company's Services or by using the Company's Services. However, the Company may disclose your personal information to its business partners who can assist them to provide Services to you as a customer or to maintain its products or systems. This includes but is not limited to providing personal information to:

- (a) the housing provider, body corporate, or government body that manages or controls you building, and their representative and agents;
- (b) our employees and related bodies corporate;
- (c) our contractors and other third parties that provide goods and services to us (including website and data hosting providers, and other suppliers);
- (d) our accountants, insurers, lawyers, auditors and other professional advisers and agents
- (e) payment system operators;
- (f) if you are an individual contractor to us or a prospective employee, to our related companies and HR related service providers (e.g. for outsourced payroll processing);
- (g) any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees);
- (h) in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors;
- (i) third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- (j) otherwise as permitted or required by law.

3.3 The Company, in its sole discretion, may disclose your personal information if it is required to do so by law or legal process, including:

- (a) in order to establish, exercise or defend its legal rights (including but not limited to debt recovery, credit rating services, and employment related matters);

- (b) as required or authorised by law; or
 - (c) to the extent required to permit the Company to investigate suspected fraud, harassment or other violations of any law, rule or regulation, our policies, or the rights of third parties or any other suspected conduct the Company deem improper.
- 3.4 The Company may also use your personal information to protect the copyright, trademarks, or other intellectual property or legal rights, property or safety of the Company, the Website, and its customers or third parties.
- 3.5 If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. The Company uses reasonable effort to only disclose personal information in good faith and where required by any of the above circumstances.

4 SECURITY AND ACCURACY

- 4.1 It is important that you advise the Company of changes to your personal information that you have provided to the Company as it is essential that your personal information is accurate, complete, and up-to-date in order for the Company to provide Services to you.
- 4.2 The Company will take commercially reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification and disclosure. However, The Company is not liable for any unauthorised access to this information.
- 4.3 the Company will take commercially reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purposes of providing our Services to you and where the Company is not required to retain that information by law.

5 ACCESS AND CORRECTION

- 5.1 You are responsible to ensure that the information you provide to the Company is accurate, complete and up-to-date.
- 5.2 By request, you may contact the Company and ask to know what sort of personal information is held about you, for what purposes, and how it is collected, held, used and disclosed.
- 5.3 By request, you may access your personal information by contacting the Company at privacy@allumeenergy.com.au. The Company reserves the right to charge a reasonable administration fee for this access.
- 5.4 The Company in its sole discretion, may consider that there is a sound reason under the Privacy Act, Freedom of Information Act or other relevant law to withhold personal information, or not make the requested changes.

6 IDENTIFIERS AND ANONYMITY

- 6.1 You acknowledge that the Company retains, collects and maintains your personal information for statistical analysis purposes (whether for commercial or non-commercial purposes). You

agree that the Company may share, distribute and/or transfer information which you have provided to the Company to third parties, after that information has been de-identified.

7 SENSITIVE INFORMATION

- 7.1 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.
- 7.2 Sensitive information will be used by the Company only:
- (a) for the primary purpose for which it was obtained;
 - (b) for a secondary purpose that is directly related to the primary purpose;
 - (c) with your consent; or
 - (d) where required or authorised by law.

8 TRANS-BORDER DATA FLOWS

- 8.1 The Company may use cloud services, and as such, its servers may be located in Australia or overseas and you acknowledge, agree and understand that your personal information may be transferred and stored in Australia and other foreign jurisdictions which the cloud services may direct the data to be stored. You agree for us to transfer your information into foreign jurisdictions for the purposes of providing you with the Services.
- 8.2 In addition to the above, the Company will transfer personal information to someone who is in a foreign country where:
- (a) the Company reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Australian Privacy Principles;
 - (b) the individual consents to the transfer;
 - (c) the transfer is necessary for the performance of a contract between you and the Company, or for the implementation of pre-contractual measures taken in response to your request;
 - (d) the transfer is necessary for the conclusion or performance of a contract concluded in your interest between the Company and a third party;
 - (e) all of the following apply:
 - (i) the transfer is for your benefit;
 - (ii) it is impracticable to obtain your consent to that transfer; and
 - (iii) if it were practicable to obtain such consent, you would be likely to give it; or

- (f) the Company has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles.

9 COMPLAINTS

9.1 As a valuable customer, if you have any complaints in relation to this Privacy Policy or privacy practice, please feel free to contact the Company via privacy@allumeenergy.com.au.

9.2 A complaint should identify whether it is about:

- (a) the collection of personal information;
- (b) the use of personal information;
- (c) the disclosure of personal information;
- (d) the security or storage of personal information;
- (e) the accuracy of personal information;
- (f) a refusal to give access to or provide about their personal information; or
- (g) a refusal to change or delete personal information.

9.3 The Company values your opinions and takes complaints very seriously. Upon receiving written notice of your complaint about privacy, the Company will respond in a timely manner to advise you of the outcome following its enquiring into the same. You will also be invited to respond to its outcome. If a response is received, the Company will assess your response and advise if it has changed its view. If you are unsatisfied with the final outcome, the Company will advise further options including, if appropriate, making a complaint with the Office of the Australian Information Commissioner.

10 OPTING-OUT OF DIRECT MARKETING

10.1 The Company aims to give you a highly personalised experience when using the Website and the Services. In order to do so, the Company may use your personal information to send you advertisements to your email address. If you decide you do not want to receive these emails containing advertisements, you can request to unsubscribe from the mailing list by clicking 'Unsubscribe' at the bottom of the email.

11 COOKIES

11.1 The Company uses cookies, web beacons and measurement software (the **Cookies**) on the Website and the Services to:

- (a) store details about your use of the Website to provide you with a personalised experience tailored to you, for example remembering your preferences and greeting you by name;
- (b) analyse Website traffic, trends and reporting statistics to improve the Website and Services;

- (c) provide you with targeted marketing communications; and
- (d) provide you with relevant advertisements when you visit the Website through third party services, such as Google Ads.

11.2 You may reject or delete the use of Cookies through the settings on your browser or mobile settings.

12 THIRD PARTY SITES

12.1 The Website may from time to time have links to other websites not owned or controlled by the Company. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that the Company is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

13 MISCELLANEOUS

13.1 Waivers

- (a) In limited circumstances, the Company may allow you to waive application of this Privacy Policy. A waiver of this Privacy Policy must be in writing and signed by the Company. The Company anticipates that the waiver of this Privacy Policy would only be in exceptional circumstances, and the Company encourages that you consider the circumstances leading to the waiver request prior to submitting such a request.

13.2 Governing Law & Jurisdiction

- (a) This Privacy Policy is governed by the laws of Victoria, Australia. In the event of any dispute arising out of or in connection with this Privacy Policy, you agree that the exclusive venue for resolving any dispute shall be Melbourne, Victoria, Australia.

14 VARIATION TO THIS PRIVACY POLICY

14.1 This Privacy Policy is available online via www.allumeenergy.com.au.

14.2 The Company reserves the right to modify or amend this Privacy Policy at any time, for any reason, and without any notice, by posting a revised version on its website. Any changes to this Privacy Policy will become effective when the Company posts the revised Privacy Policy on the website. Your use of the website following these changes means that you accept the revised Privacy Policy.

14.3 This policy was last modified on 18 November 2020.

15 CONTACT

15.1 Please contact the Company if you have any questions regarding this Privacy Policy.

Email: privacy@allumeenergy.com.au