

PRIVACY POLICY AND CREDIT REPORTING POLICY



INTRODUCTION

This document includes:

- Our Privacy Policy, explaining how we collect, hold, use and disclose personal information
- Our Credit Reporting Policy, explaining how we manage credit information and credit eligibility information

Who we are: CIRCLES AUSTRALIA PTY LIMITED, ACN 630 647 264 trading as Circles.Life

Our contact details:

- Voicemail: **1300 863 004**
- Email: **happinessau@circles.asia**
- Website for Contact Us forms and Live Chat: <https://www.circles.life/au>

PRIVACY POLICY

Privacy Commitment

Privacy matters to us and we know it matters to you. We provide a wide range of products and services and to do this 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. We are bound by the Privacy Act 1988 (Cth) and the associated Australian Privacy Principles. As a supplier of telecommunications services, we also have obligations under other laws, regulations and industry codes.

By using our website, or by providing any personal information to us, you consent to the collection, use and disclosure of your personal information as set out in this Privacy Policy.

Personal Information

This refers to information about a living person who is identified or reasonably identifiable, whether or not true and whether or not recorded in material form.

Kinds of Personal Information We Collect and Hold

We may collect and hold:

- personal details like name, date of birth, gender, occupation and driver licence number
- contact details like physical, postal, work and email addresses and phone numbers
- financial details like bank account, credit card numbers and your billing and payment history with us
- service-related details like your user name, encrypted password and service usage history, support incidents, enquiries and complaints
- other details relating to special situations like specific health information if you apply for priority assistance and information about any authorized representative you appoint.

We only collect personal information that is reasonably necessary to support our functions and activities.

Collecting Personal Information

Unless it is not reasonable or practicable to do so, and in other cases allowed by law, we will collect personal information about you directly from you (e.g. when you contact us by phone or online, or at our premises).

Collection From Third Party Sources

In other cases, we may collect personal information from someone other than you, and you may not be aware of the collection, when it is not reasonable or practicable to collect it from you. We may collect personal information about you from:

- publicly available sources like phone books
- other companies in our group that you may have dealt with
- third parties like our business partners, your authorised representative/s and wholesalers
- information brokers
- other telecommunication and information service providers that interact with us in providing products to you (eg overseas when you use a roaming mobile service)
- fraud checking agencies
- credit reporting bodies - see our Credit Reporting Policy below for details
- our dealers, contractors and other representatives that you may deal with
- our websites and how you use them
- various parties listed under Disclosing personal information in this Privacy Policy.

Collection Under Law

We may be required to collect personal information by law.

Why We Collect and Hold Personal Information

We collect and hold personal information because:

- we may need to use it to operate our business, and comply with the law
- we may need to provide it to other parties in connection with our business. The uses and disclosures we may make of personal information are detailed in this Privacy Policy

How We Hold Personal Information

We hold personal information in hard and/or soft copy at our offices and in other facilities that we own or license from third parties, like data centers. We take reasonable steps to keep it secure and to protect it from unauthorised access, use or alteration.

Unavailability of Personal Information

If we cannot collect the information we need about you, we may not be able to supply the products or service you want.

Using Personal Information

We may use personal information:

- to identify you
- for credit checks - see our Credit Reporting Policy below for details
- to prevent fraud
- to supply products (including goods and/or services) to you
- to give you information about us and our products, and product offers
- for direct marketing – see Direct marketing for details
- to improve our products, our marketing and our website
- to answer your enquiries
- to give you customer support and service
- to better understand your needs and respond to them
- to manage and plan our products and business
- to charge and bill you for products you use
- to collect payment from you
- to comply with the law
- for purposes related to the operation of our business

Disclosing Personal Information

We may disclose personal information as reasonably required:

- to contractors and suppliers who supply or support us in:
- market research, sales and marketing
- direct marketing – see Direct Marketing for details
- identity and fraud checking
- credit management
- service provisioning
- installation, maintenance and repairs
- helpdesk and enquiries
- support and complaint management
- communications and mailing
- billing, debt recovery and credit management
- corporate strategy
- legal and regulatory advice and compliance
- accounting and financial planning
- risk management
- providing goods and services that we use to operate our business and provide products and support to you
- to your authorised representative/s and people who pay for your services
- if you ask us to do so
- to our referrers, agents, and members of our corporate group
- to our business partners and wholesale suppliers
- to organisations that provide credit or finance to us
- to persons who invest in or acquire all or part of our business or company, or are considering doing so

Some of these parties may be based overseas, e.g. Singapore and the Philippines

Direct Marketing

We may use and disclose personal information to directly market to you products offered by us, our referrers, agents, and members of our corporate group, and our business partners, where we think the offers will be of interest to you, using:

- post
- email
- electronic messaging
- social media
- targeted web content
- other direct marketing channels.

Direct marketing may continue even if you are no longer our customer until you opt-out by calling the number in the section “Contacting Us” below or by using the unsubscribe functionality included in the emails or electronic messaging we send to you.

CREDIT REPORTING POLICY

This Credit Reporting Policy sets out information about our collection, use and disclosure of credit information and credit eligibility information (together referred to as credit information in this policy) in accordance with Part IIIA (Credit reporting) of the Privacy Act 1988 (Cth) and applies in addition to our Privacy Policy in respect of credit information.

Kinds of Credit Information We Collect and Hold

Sometimes, such as when we are checking your credit worthiness or assessing your credit situation, we might collect credit information from or give information to credit reporting bodies. Credit information we may collect and hold can include:

- identification information
- details about information requests made about you to credit reporting bodies
- current and historical details about credit applications you have made and credit arrangements you have entered into
- information about credit liability, overdue payments, default listings and about serious credit infringements and information about court proceedings, payments or subsequent arrangements in relation to either of these
- various publicly available information such as bankruptcy and credit related court judgments
- credit scores or risk assessments indicating an assessment of your credit worthiness.

Credit information includes information about your dealings with other credit providers (for example, banks, other financial institutions, or other organizations that may provide you with credit in connection with their products or services).

It may also include certain creditworthiness information that we derive from the data that we receive from a credit reporting body that we may use in our decision about whether to provide credit to you. Sometimes we may collect this information about you from other credit providers.

Use and Disclosure of Credit Information

We may disclose your credit information to credit reporting bodies. They in turn may include it in credit reporting information they provide to other credit providers to assist them to assess your creditworthiness. We may use or disclose your credit information for purposes such as:

- developing our credit assessment and credit worthiness rating system
- processing credit-related applications and managing credit that we provide
- 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
- participating in the credit reporting system
- dealing with complaints or regulatory matters relating to credit or credit reporting
- when required or authorized by another law

We may disclose your credit information to other companies in our group. Some of these parties may be based overseas, e.g. Singapore and the Philippines.

Credit Reporting Bodies

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 may contact our credit reporting body by using the following information. If you have any questions regarding your publicly held personal credit file then please contact Equifax as follows:

Equifax

Address: **GPO Box 964, NORTH SYDNEY NSW 2059**

Telephone: **13 83 32**

Website: <https://www.mycreditfile.com.au/products/equifax-credit-report-formerly-known-my-credit-file>

For information on how you may access or correct credit information held by us or to complain about a failure to comply with our obligations in relation to the management of your credit information, please see the section headed "Contact for access, correction and complaints" below.

CONTACT FOR ACCESS, CORRECTION AND COMPLAINTS

Accessing and Correcting Personal Information and Credit Information

Please contact us for these purposes using the details in Contacting us below. We shall process and respond to your request in accordance with Australian Privacy Principle 12 (in relation to personal information) and Part IIIA (Credit reporting) of the Privacy Act 1988 (Cth) (in relation to credit information). There is no charge for making a request but a reasonable administrative charge, on a cost recovery basis, may be payable before we agree to provide access.

Complaints

If you wish to complain about a breach of the Australian Privacy Principles, Part IIIA (Credit reporting) of the Privacy Act 1988 (Cth) or a registered credit reporting code, then please contact us using the details in Contacting us below. We shall:

- acknowledge your complaint within a reasonable time
- give you an estimated first response time
- allocate your complaint to a suitably senior staff member
- process and respond to your complaint as soon as we reasonably can.

If your complaint relates to our handling of credit information, we will acknowledge your complaint and inform you how we will deal with the complaint within 7 days and provide a response within 30 days (or such longer time as we agree in writing).

Contacting Us

Questions, requests and complaints regarding our Privacy Policy, our Credit Reporting Policy or our compliance with privacy laws or management of your credit information should be directed to us by telephone on **1300 863 004** or email to **happinessau@circles.asia**. Alternatively, you can reach us via live chat on our website during the business hours advertised on our contact us page.