

PRIVACY POLICY AND CREDIT REPORTING POLICY

INTRODUCTION

Who we are: Circles Australia Pty Ltd, trading as Circles.Life

On this webpage, you can find

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

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

Circles is committed to protecting the privacy of our customers and ensuring your information is safe and secure. Our Privacy Policy is guided by the Privacy Act 1988 (Cth) and the associated Australian Privacy Principles, and other relevant laws, regulations and industry code applicable to the telecommunications industry.

Our Privacy Policy applies to all individuals who hold accounts with Circles or visit, access or use features on our website and Circles.Life app. This Policy is designed to assist you in understanding how Circles collects, use, disclose and/or process your personal data, and to help you make an informed decision before you provide your personal data to us.

By using our website, and providing your personal information to us, you consent to Circles collecting, using and disclosing your personal information as set out in this Privacy Policy.

Personal Information

Personal information refers to information about a living person who is identified or reasonably identifiable, regardless of whether the information or opinion is true or recorded in a material form.

Personal Information We Collect

We may collect and hold:

- personal details like your name and associated aliases, date of birth, sex, occupation and driver's licence number;
- contact details like physical, postal, work and email addresses and phone numbers (past and present);
- 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 complaint; and
- other details like specific financial and/or health information if you apply for priority assistance, and information about any authorised representative you appoint.

We will only collect personal information that is reasonably necessary to support our services, functions and activities. By providing your personal information to us, you hereby warrant and represent that you are authorised to disclose the personal data to us.

Collecting Personal Information

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

There may be instances where we may collect personal information from a third party. This happens when it is not reasonable or practicable to collect it from you; and you may not be aware of such collection. We may collect personal information from the following third party sources:

- 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;
- 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 your activity on it;
- various parties listed under Disclosing Personal Information in this Privacy Policy; and
- other telecommunication and information service providers that interact with us to facilitate the provision of services to you.

We may also be legally required under local law to collect your personal information.

Purpose Of Collection Of Personal Information

We collect and hold personal information for the following purposes:

- To operate our business, and comply with local laws; and
- To provide it to other parties in connection with our business. See how we use and disclose your personal information below.

If we are unable to obtain your personal information, we may not be able to supply the products and/or services advertised on our websites.

Holding Personal Information

Your personal information - whether in hard or soft copy - is secured 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 protect it from unauthorised access, use or alteration.

Using Personal Information

We may use your 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 provide you with the latest information about Circles and our products, and product offers;
- for direct marketing – see details in 'Direct Marketing' below;
- 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 local laws; and
- for purposes related to the operation of our business.

Disclosing Personal Information

We may disclose your 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' below 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; and
- 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, including in Singapore and the Philippines.

Direct Marketing

We may use and disclose your personal information to share products offered by us, our referrers, agents, and members of our corporate group, and our business partners. We may do so via:

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

Direct marketing may continue even if you are no longer our customer. You will need to opt-out of direct marketing and can do so by:

- Clicking on the unsubscribe functionality found in our emails or electronic messaging to you; or alternatively,
- Contact us by calling, emailing or leaving us a voice message. You can find our contact details above.

ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

You may make a request to access and/or correct your personal data in our possession or control by contacting us through our contact channels listed here: <https://www.circles.life/au/help>. You will need to provide the requisite information that will allow us to ascertain your identity, the nature of your request and any information needed to facilitate your request.

To request access to personal data, we will seek to provide you with the relevant personal data as soon as practicable. Please note that there may be situations where we may not be able to process your request in full. For example, we may not be able to provide you with access to personal data if the provision of such access reveals personal data about another person, or doing so would harm the life, safety and security of an individual or the public.

To request a correction of personal data, once we receive sufficient information for you to facilitate the correction, we will:

- Correct your personal data as soon as practicable. Where we may expect a delay, we will notify you of the soonest possible time we are able to facilitate the change.
- We may send the corrected personal data to third parties for legal or business purposes (or any of the purposes outlined above), unless the organisation does not need the corrected personal data.

We may where necessary also contact you to ensure that your personal information with us is up-to-date.

COMPLAINTS PROCESS

If you have any complaints regarding how we are handling your personal data, or how we are complying with the Australian Privacy Principles or relevant local laws, you may contact us at dpo@circles.asia. We are committed to dealing with your complaint in a reasonable and fair manner.

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 the Privacy Act 1988 (Cth) and our Privacy Policy.

Credit Information We Collect and Hold

We may collect and hold your credit information, such as:

- 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; and
- credit scores or risk assessments indicating an assessment of your credit worthiness.

We may collect this information directly from you, or from other credit providers (e.g. banks, other financial institutions, or other organisations that may provide you with credit in connection with their products or services).

Use and Disclosure of Credit Information

We may use your credit information to:

- develop our credit assessment and credit worthiness rating system;
- process credit-related applications and manage credit that we provide;
- assist you to avoid defaults;
- collect amounts you may owe us in relation to such credit and dealing with serious credit infringements;
- assign our debts;
- participate in the credit reporting system;
- deal with complaints or regulatory matters relating to credit or credit reporting; and
- when required or authorised by local laws.

We may disclose your credit information to:

- Credit reporting bodies. They may in turn include it in credit reporting information provided to other credit providers to assess your creditworthiness, or for the purposes outlined above; and
- other companies in our group for the purposes outlined above. Some of these parties may be based overseas, including in 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.

If you have any questions regarding your publicly held personal credit file, you may contact our credit reporting body at:

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 Circles, or to report 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 note that we will process and respond to your request in accordance with Australian Privacy Principles and the Privacy Act 1988 (Cth).

There is no charge for submitting a request, but you may incur an administrative charge, on a cost recovery basis, which may be payable before we facilitate access and/or correction.

Complaints

If you wish to complain about a breach of the Australian Privacy Principles and/or, the Privacy Act 1988 (Cth) or a registered credit reporting code, our contact details can be found in the section "Contacting Us" below. .

We are committed to:

- acknowledging your complaint within a reasonable time;
- providing you an estimated first response time;
- triaging your complaint to a suitably senior staff member; and
- responding 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 of our complaints review process within 7 days. We will provide a response within 30 days, or a time frame that we have agreed to with you in writing.

Contacting Us

You can contact us by telephone on 1300 863 004 or email us at happinessau@circles.asia.

Alternatively, you can reach us via live chat on our website during our business hours. Please see our ["Contact Us"](#) page for more information on our business hours.