PURPOSE

The purpose of this policy is to ensure that Energy Queensland Limited and its related bodies corporate (referred to as members of the Energy Queensland Group) comply with their privacy obligations under the Privacy Act 1988 (Cth) (Privacy Act).

This policy also describes how the Energy Queensland Group handles credit-related information that is collected (set out at Annexure A to this policy).

POLICY STATEMENT

The members of the Energy Queensland Group will effectively manage the collection, storage, use and disclosure of personal information for the purpose of their business activities in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act.

This policy gives effect to the commitments set out in Energy Queensland Group's Privacy Statement at Annexure A to this policy and published on the website (www.energyq.com.au).

IMPLEMENTATION

This policy applies to all members of the Energy Queensland Group, their officers, employees, contractors (where applicable) and any other person notified that this policy applies to them.

This policy is intended to apply to a secondee to the Energy Queensland Group. However, if an equivalent policy of the seconded employee’s employer creates an enforceable right, this policy will apply to that employee only to the extent that it can operate consistently with the equivalent policy.

Every person within the Energy Queensland Group is required to comply with the Privacy Act. The key obligations that affect day to day business are summarised below. These obligations must always be considered in the context of Energy Queensland Group’s Privacy Statement which expresses the Energy Queensland Group’s commitment to its customers and other individuals. This policy and the Privacy Statement are high level summaries of Energy Queensland Group’s key privacy obligations.

Collection of personal information

Personal information should only be collected:

- if it is necessary for one or more of Energy Queensland Group’s business activities or functions;
- by lawful and fair means; and
- from the relevant individual, if reasonable and practicable to do so.

The Privacy Statement describes the types of personal information that may be collected by Energy Queensland Group, including the types of sensitive information (which is a subset of personal information).

Use and Disclosure

Personal information must only be used and disclosed:

- for the primary purpose for which it was collected or a related purpose if the individual would reasonably expect their information to be used or disclosed for such a related purpose; or
- if the person has consented to such use or disclosure; or
• in limited circumstances in relation to (i) direct marketing – individuals have a choice to opt-out of receiving direct marketing materials. If the individual does not wish to receive this information, they are advised to contact us to advise that they wish to opt out of receiving our marketing material; (ii) the health and safety of individuals and the public; (iii) to assist law enforcement agencies; (iv) to assist in locating missing persons; or (v) to assist in the establishment, exercise or defence of a legal or equitable claim; or

• where it is required or authorised by or under an Australian law or a court / tribunal order; or

• where there is reason to suspect an unlawful activity, or misconduct of a serious nature that relates to Energy Queensland Group’s business activities or functions has been, is being, or may be engaged in, and it is reasonably believed that it is necessary to take appropriate action in relation to the matter.

Cross-border disclosure of personal information

Personal information may only be disclosed to someone in a foreign country where reasonable steps have been taken to ensure that the overseas recipient does not breach the APPs.

There are exceptions, including:

• where the overseas recipient of the information is subject to a law or binding scheme that has the effect of protecting the information in a substantially similar way in which the APPs protect the information, and there are mechanisms that the individuals can access to take action to enforce the law or binding scheme;

• the disclosure is required or authorised by or under an Australian law or a court / tribunal order.

Protection of personal information

Reasonable steps must be taken to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

Reasonable steps must be taken to securely destroy or de-identify personal information where Energy Queensland Group no longer needs such information for any purpose and where it is not required by or under an Australian law, or court/tribunal order to retain that information.

Governance and accountability

This section outlines the key roles and responsibilities to ensure that Energy Queensland Group comply with their privacy obligations under the Privacy Act.

<table>
<thead>
<tr>
<th>Role / Position</th>
<th>Responsibilities</th>
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<tbody>
<tr>
<td>EQL Board</td>
<td>The responsibility of the Board is articulated in the EQL Board Charter.</td>
</tr>
<tr>
<td>Board Committees</td>
<td>The responsibilities of the Board Committees are articulated in the relevant Committee Charters.</td>
</tr>
</tbody>
</table>
| Executive Leadership Team (ELT) (Chief Executive Officer (CEO) & Executive General Managers (EGMs), (both individually and collectively) | Each executive is:  
  • Ultimately accountable for ensuring the collection, storage, use and disclosure of personal information under their control is managed in accordance with the Privacy Act.  
  • Accountable for establishing, implementing and maintaining privacy procedures and controls to |
### Role / Position | Responsibilities
--- | ---
|  | effectively manage personal information in accordance with the Privacy Act.
|  | • Responsible for promoting compliance with this policy and proactively assessing significant privacy risks.

**General Managers**

Each General Manager is:

- Responsible for ensuring significant privacy risks are identified, managed and escalated / referred to ELT / EGM's (as appropriate) within their teams.
- Responsible for promoting and ensuring compliance with this policy within their teams.

**Line Managers and Supervisors**

Each supervisor is:

- Responsible for ensuring significant privacy risks are identified, managed and escalated / referred to GM / EGM's (as appropriate) within their teams.
- Responsible for promoting and ensuring compliance with this policy within their teams.

**Employees, Agents, Contractors and Consultants**

As privacy matters to everyone, every person within the Energy Queensland Group must:

- comply with this policy and the Privacy Act at all times;
- not engage in behaviour, or ignore or allow behaviour by others, that breaches this policy and the Privacy Act;
- promptly raise issues or suspected breaches of this policy with the Company Secretary.

### REFERENCES

- P004. Energy Queensland’s Employee Code of Conduct Policy
- P015. Energy Queensland’s Compliance Management Policy
- R056. EQL Risk Appetite Statement and Risk Evaluation (Consequence and Likelihood) Matrix
- P043. EQL Risk Management and Resilience Policy
- EQL Data Breach Response Plan
- *Privacy Act 1988 (Cth)*
- *Public Records Act 2002 (Qld)*

### DEFINITIONS

**AAPs**

The Australian Privacy Principles set out in 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.
Sensitive information

Sensitive information’ is a subset of personal information and is defined as:

- information or an opinion (that is also personal information) about an individual’s:
  - racial or ethnic origin; or
  - political opinions; or
  - membership of a political association; or
  - religious beliefs or affiliations; or
  - philosophical beliefs; or
  - membership of a professional or trade association; or
  - membership of a trade union; or
  - sexual orientation or practices, or
  - criminal record;
- health information about an individual; or
- genetic information about an individual (that is not otherwise health information); or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

(Refer to section 6 Privacy Act)

This policy and any related documents.

ENFORCEMENT

A breach of this policy may also constitute a breach of the Privacy Act and incur penalties. Any non-compliance with this policy should be managed in accordance with Energy Queensland’s Compliance Management Policy.

VARIATION

This policy is not intended to detract from, or add to, any rights held by a person covered by this policy under a contract of employment or enterprise agreement. Subject to any consultation obligations, Energy Queensland Group may vary, add to, withdraw, or replace this policy, at its discretion, at any time.

CATEGORY

Governance
Privacy Statement

Energy Queensland
September 2019
Energy Queensland Limited and its related bodies corporate (referred to as members of the Energy Queensland Group) are committed to protecting your personal information. Our Privacy Statement explains how we collect, hold, use and disclose your personal information. Please refer to the section on credit reporting for information on our management of your credit-related information.

In this Privacy Statement, **we, us and our** means each member of the Energy Queensland Group.

**What kinds of personal information do we collect?**

We only collect and hold personal information so that we can provide you with the services and products that you have requested, and to carry out one or more of our activities. In this Privacy Statement, **personal information** has the meaning given to it in the **Privacy Act 1988** (Cth), and includes information or an opinion, whether true or not, about an identified individual or an individual who is reasonably identifiable.

The types of information we may collect about you include:

- **identity information**, such as your name, postal or email address, telephone numbers, and date of birth;
- **billing and credit information**, such as your credit history, your payment history or your credit rating from a credit reporting body (please refer to the section on credit reporting below for more information);
- **information about your dealings with us**, how you use the products and services, and technical information about your products and services;
- **details of your meter**, including location, type and consumption data;
- **property access information** for the supply of our services – for example, to supply electricity, we may need information about any dogs on the premises; and
- **other information** we consider necessary to provide our products or services to you.

We will only collect ‘sensitive information’ from you with your consent and where we reasonably need to do so, to provide you with products or services or carry out our activities (e.g. for the purposes of helping customers on life support). **Sensitive information** is personal information that includes information about things like your health, genetic or other confidential information (such as a person’s criminal record, personal preferences or beliefs).

We may also need you to provide personal information about other individuals (e.g. about your authorised representatives). If you do, it is your responsibility to inform these individuals that their personal information has been supplied to us and advise them about this statement.

**How we use and disclose personal information**

We collect your personal information to allow us to provide you with our products and services. This includes using your information to:

- provide you information about products and services;
- consider your request for products and services, including your eligibility – for example, for financial assistance payments;
- verify your identity (identifiers may be checked online with relevant issuing Government Departments or through our third parties such as credit reporting bodies or information service providers);
- process your application and provide you with products and services;
- check your previous payment history with us and undertake a credit check;
- consider your application/request to provide you with credit;
- connect and disconnect services;
- improve and develop existing and new products and services (including by conducting customer and market research);
- administer the products and services we provide you – including answer your queries and complaints, issue bills and seek payment;
• recover debt (this may include disclosure of any overdue accounts to external debt collection agencies and listing with credit reporting bodies);
• maintain our records and internal reports;
• if you are applying for employment with us, to assess your suitability;
• maintain our relationship with you;
• conduct marketing, promotions, competitions and surveys, and for community engagement matters;
• ensure safety and compliance at our sites and for life support and safety purposes;
• comply with our legal obligations, including under the Work Health and Safety Act 2011 (Qld);
• assist in the establishment, exercise or defence of a legal or equitable claim.

In addition, we may collect, hold, use and disclose your personal information to:

• supply you with electricity, including connections, disconnections, life support and other service requests or changes from you or your electricity retailer;
• respond to any safety or emergency issues such as power lines down;
• attend to network related requirements including maintenance, vegetation management, street lighting, meter readings and any other request you may have made to us or your electricity retailer;
• notify your electricity retailer of issues concerning your electricity service;
• address any query, feedback or complaint that you may raise with us or your electricity retailer;
• recover costs for damage to network assets.

We may also use and/or disclose your personal information for other purposes which you consent to or which are required or authorised to do so by law. This may include for a secondary purpose that is related to a purpose for which we collected it, and for which you would reasonably expect us to use or disclose your personal information.

Direct Marketing - We may use your information to contact you about new offers, products and services. You have a choice to opt-out of receiving direct marketing materials. If you do not wish to receive this information, please contact us.

How do we collect personal information?

We usually collect personal information directly from you unless this is unreasonable or impracticable. For example, we may collect your personal information when you complete a form, through use of our services available through our websites, applications or social media channels or when you contact us (including in writing, electronically or by telephone).

We use only lawful and fair means to collect your personal information and take reasonable steps to provide specific Privacy Notices at the time we collect your personal information. We will try to give you the Privacy Notice at that time, but sometimes we may need to provide it to you soon afterwards. We may provide the relevant Privacy Notice to you verbally, in a confirmation email to you, on the relevant form, in the terms that apply to your service or product, or by referring you to our website.

We will assume that, unless you tell us otherwise, you consent to us collecting the information that you provide to us (either directly or indirectly) for use and disclosure by us according to this Privacy Statement.

We may sometimes collect personal information about you from other people or third parties. This may include collecting your personal information from our related bodies corporate or our third parties that provide services to us in connection with our business.

Who do we disclose your personal information to?

We may disclose your personal information (including, in certain limited circumstances, your sensitive information) for purposes for which we collected it, and for which you would reasonably expect us to use or disclose your personal information (as described above) to:
a related body corporate or joint venture of the Energy Queensland Group or other organisations with whom Energy Queensland Group has affiliations so that those organisations may provide you with information about their services (except where we are precluded from doing so due to specific obligations in respect of confidentiality);

• our employees or contractors, agents, and external advisers, such as lawyers, auditors, accountants and financiers;

• organisations who provide services to us in connection with our business, such as mailing operations, billing and debt recovery functions and information technology services;

• credit-reporting bodies (please refer to credit reporting section below for more information) and agencies for identity checking and credit related purposes such as credit-worthiness, credit rating and default listing);

• law enforcement or government agencies, as required or authorised by law (for example, to the Australian Tax Office).

We take reasonable steps to ensure these organisations comply with confidentiality and privacy obligations concerning the protection of personal information.

Credit reporting

We collect your credit-related information to allow us to decide whether to provide you with any of our products and services on credit.

Sometimes we may receive credit eligibility information about you from credit reporting bodies. This information is used to enable us to assess your credit worthiness. The information we may provide to or receive from credit reporting bodies includes:

• identity information, such as your name, account number, last known premises or postal or email address, contact details, date of birth, driver licence numbers, passport numbers or Medicare numbers;

• statement of account information, such as receipt of payment, default status, outstanding debt at the time of referral, amounts that are overdue and for which debt collection action has started;

• advice that payments are no longer overdue;

• if relevant, information about serious credit infringements, such as fraud or intention not to comply with credit obligations;

• billing information, such as premises last read (date of final read), due date of bill, billing period of bills, type of bills request (e.g. moving in customer request, premise disconnection request).

The credit reporting bodies may also disclose your credit information as permitted by the Privacy Act 1988 (Cth), including to other credit providers for a consumer credit related purpose.

We may use or disclose such information for purposes such as:

• processing applications to provide products or services to you on credit;

• managing our credit relationship with you, including assisting you with debt repayments and dealing with your queries and complaints relating to credit or credit reporting;

• using your credit-related personal information to collect any money owing to us;

• referring any overdue accounts to other third parties that provide credit-related services to us, such as external debt collection agencies;

• providing your credit-related personal information when required or authorised by law.

The credit reporting bodies have their own policies on the management of credit information, including details on how to access your credit-related information they hold.
Third party websites

We may provide links to other websites operated by third parties. 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. If you visit a linked website, the use of a third party website will be governed by their own terms of use (including privacy policies).

How we protect personal information

We use a range of security mechanisms and procedures to protect your personal information and will take all reasonable measures to ensure that your personal information is stored securely both in electronic and physical forms.

We also take reasonable steps to securely destroy or de-identify personal information where we no longer need it for the purpose for which we collected it and where it is not required by or under an Australian law, or court/tribunal order to retain that information.

How personal information can be accessed and corrected

We take reasonable steps to ensure that the personal information that we collect and hold is accurate, complete, relevant, not misleading, timely and secure. We recommend that you promptly advise us:

- if there is any change to any of the details you have given us; or
- if it comes to your attention that we hold information about you that is not correct, accurate, complete, up-to-date or relevant,

so that we can continue to provide the products and services you require.

We will allow access or use all reasonable efforts to correct the information that we hold about you unless we consider that the law permits or requires us to withhold the information or not make the correction. We will do this within a reasonable time. We may first require proof of your identity. There is no charge for requesting access to, or correction of, personal information.

If we cannot provide you with access to your personal information, or cannot correct it if requested, we will provide a written notice of our reasons for refusal.

You can contact us at our contact page on our website for more information about how to do this.

Anonymity

You can ask to deal with us anonymously or using a pseudonym. We will generally allow this where lawful and practicable (for example, where you wish to make an anonymous complaint and we do not need your actual name to investigate that complaint). Depending on the products or services that we provide, we may require this information to be able to deliver of those services effectively to you (for example, when we are providing a service to you at your residential address).

Overseas transfer and storage of personal information

We may sometimes disclose your personal information to third parties overseas. If we use a cloud-based service to store and process personal information, such a service may use a server hosted overseas to store data including your personal information.

Cookies

Our website may use cookies to collect information about your use of the website (such as, date and time of visits, IP addresses) and to track advertising campaign data for advertising purposes. A 'cookie' is a small file that is sent to your computer when you visit our website. Cookies may store user preferences and other information. The cookies we use do not store any personal data or collect personally-identifiable information. You can set your browser to refuse cookies or to indicate when a cookie is being sent.
Complaints
You can make a privacy related complaint by contacting us at our contact page on our website. If you are not satisfied with the outcome of your complaint, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC) by calling 1300 363 992 or by visiting the website at www.oaic.gov.au.

How to contact us
If you have any queries about this Privacy Statement, please contact us at our website.

You can also write to us at:
PO Box 1090
Townsville QLD 4810

Changes to this Privacy Statement
This Privacy Statement may change from time to time. Please visit our website for the most current version or contact us at the contact page on our website for a copy.

Disclaimer
This Privacy Statement is subject to our Terms of Use. You should read that disclaimer before providing personal information to us.