

Pooled Energy Privacy Policy

Pooled Energy Pty Ltd (Pooled Energy) is an electricity retailer in the National Electricity Market, authorised to sell retail electricity in NSW, Queensland, ACT, South Australia and Tasmania. We are a specialist Energy and Pool Management Company, selling only to swimming pool owners where we provide energy and install water chemistry sensors and control systems on the pool and optimize for these.

Pooled Energy is an integrated electricity retailer and pool automation system and services provider. We supply and sell electricity and related services together with pool services, to households and businesses, and therefore collect, hold, use and disclose information for this purpose.

Pooled Energy is committed to protecting the privacy of our customers, our business contacts and our employees. During the collation and handling of personal information, we are bounded by the Australian Privacy Principles (APPs) contained within Schedule 1 of the Privacy Act (1998). This is an Australian law which regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information, and access to and correction of that information. All references to 'we', 'us', and 'our' in this Privacy Policy refer to Pooled Energy Ltd.

Collection of Personal Information

We collect and hold a range of personal information that is reasonably necessary for the purpose of supply customers with our services and products. Personal information is information or an opinion in any form (whether true or not), about an identified individual or an individual who is reasonably identifiable.

The kinds of personal information we collect and hold about you will depend on the circumstances of collection, including whether we collect the information from you as a customer, supplier, stakeholder, or in some other capacity.

The kind of personal information we collect for this purpose may include your:

- Name
- Date of Birth
- Contact information - Including your address and telephone numbers for our services and products.
- Whether you are a residential or business customer - in the case of business customers, Pooled Energy Ltd may also collect the name, title and contact details of a contact person in your business.
- National Meter Identifier (NMI) – A NMI is an identification number that helps us to identify your electricity meter.

- NMI address - the meter location which may be the same as your personal address.
- Drivers License details
- Information about your property so can safely undertake any maintenance that needs to occur such as a dog or access requirements.
- Wi-Fi details
- Bank account details for direct debit

We are committed to doing all things reasonably necessary so that your information we hold is accurate, up-to-date, complete and relevant. It is necessary for us to collect your personal details so that we can provide you with our services or products. However, if it is practicable and lawful for us to do so, we will give you the option of dealing with us anonymously or through the use of a pseudonym (this could be in the case of making an anonymous complaint where we do not require your details to investigate however if it is a specific complaint based around your account we will need further details to investigate further). Generally, we will not collect sensitive information about you, such as details of your race, political beliefs, religion or health. We may however, collect some health information in certain circumstances. For instance, we may need to collect your health information if you use particular health-related appliances in your household such as life support equipment. We will only collect and use health information for these purposes where you have provided your consent. Occasionally, we also collect, use and disclose personal credit information about our customers. We may also collect information directly from you and/or from other data providers about what, how and when you buy products or services and your stated or likely preferences, such as whether you are interested in certain products or promotions. By providing us with your personal information (including your sensitive information), you consent to the collection, use, disclosure and storage of that personal information as set out in this Privacy Policy. If we're unable to collect your personal information, we may not be able to provide you with our products or services or do business with you or the organisation with which you are connected. For more information about how we handle this information, refer to our Credit Reporting Policy which forms part of our Privacy Policy.

How does Pooled Energy collect personal information?

Direct

We generally collect your personal information directly from you. For example, we may collect personal information about you when you deal with us over the telephone, send us correspondence (whether by letter or email or social media) or when you complete a form on our website. If we do not obtain the information requested, we may not be able to provide you with the products or services requested.

Indirect

There may be occasions when we need to obtain personal information about you from a third party. This may include obtaining information relating to you from a credit reporting agency or from a publicly maintained report, builders and real estate agents for notification of new occupants and tenants who are using energy, through promotional means (i.e. our website or events you may have attended) or

directly from your energy distributor. If we collect information from you by any of the above means, including where a third party provided us with the information we have not asked for, we will destroy or de-identify the information unless we would have collated the information under the APPs. If you provide personal information to us about someone else (such as one of your employees, service providers, or members of your household) you must be entitled to disclose that information to us and make sure that we are entitled to collect it. You should let the person know that they can access this Privacy Policy on our website or by calling us using the contact details set out below. If the information you are providing to us is sensitive, you will need to obtain the consent of the person to whom it relates to before you provide it to us.

Online Collection

Please be aware that information transmitted over the internet is not secure, particularly where no encryption is used (e.g. email, standard HTTP web pages). We are only required to protect the security of personal information once it is in our possession. If you are concerned about transmitting your personal information over the internet, you can contact us by telephone or post. However, during our business activities, we may send information within our company, to and within our related companies, or to third parties, including over the internet. Our website or online services may provide links to third party websites or services. We are not responsible for the privacy policies or practices of those sites or services, and suggest you obtain a copy of their published policies for your reference.

We or a third party engaged by us may use 'cookies' when you visit our website. 'Cookies' are small files which identify your computer and will occasionally log your IP address when you visit the website. This allows us to review traffic patterns on our website, review customer interest in our advertising and manage our website. If you do not wish for 'cookies' to take note of your website visitation you can set your browser or mobile device to opt out.

Use and Disclosure of Personal Information

How do we use your personal information?

We use your personal information to effectively conduct our business, including to:

- Verify current customer's and potential customer's identity and personal information to ensure our records are correct and up to date
- Supply our customers with our products and services
- Safely access and work at a customer site
- Provide regular, detailed bills
- Process payments, collect debts, and provide any refunds due
- Understand our customers' energy and pool usage and their future needs of these
- Analyse energy use, system performance and reliability
- Manage and provide maintenance of our system
- Test and develop upgrades and improvements to our system

- Improve and optimise our products and services
- Maintain and update our records, and complete administrative tasks
- Communicate with our customers
- Inform you of other products and services available
- Manage our relationships with our suppliers and other stakeholders
- Assess your application for potential employment, conduct background checks, and consider and contact you regarding current, future or other positions
- Comply with our legal obligations
- Use your information to assist in the maintenance of your electricity meter
- For research to develop and improve our customer products and services
- We may also use your information for other purposes required or authorised by or under law including scenarios where you have provided us with your consent

How does Pooled Energy store your personal information?

We will take all practicable measures so that personal information held by us is secure from such risks as loss and interference, unauthorised access, destruction, use, modification or disclosure. Our IT systems are password protected and we use firewalls and encryptions (security measures for the internet). We also maintain physical security over our paper files, data stores and premises. Access to personal information is restricted to our authorised personnel, who need to access those records as part of their job. We will take all practicable measures to destroy or de-identify personal information that we no longer need. In some instances, your personal information will be stored on secure computer servers in the United States.

Who do we disclose your personal information to?

We collect, hold, use and disclose personal information for the purpose of providing you with services and products you have requested. To carry out those services, we may need to use and disclose personal information to establish and maintain any necessary records, credit checks, invoicing and billing systems, debt recovery or to assist our organisation in the development of new and better services. We will use your personal information only for the purpose for which it was collected, unless we have your consent or the different use is permitted under the APPs To enable us to conduct our business activities, we may disclose your personal information to others, specifically our:

- Our contractors, suppliers, agents, related entities and partners who assist us to provide products and services and to administer, manage and improve our business, including companies that provide products and services based on smart meter data and companies who manage the distribution of energy

- Service providers who provide installation, maintenance, meter reading and other services related to metering
 - Billing services provider
 - Corporate finance and banking providers
 - Your energy distributor, and/or previous energy distributor and/or previous retailer
 - Suppliers of potential employment related services (e.g. background check providers, law enforcement agencies, professional and trade associations)
 - Government and regulatory authorities (as required or authorised by law)
 - Credit providers and agencies
 - Our professional advisors (such as auditors and lawyers)
 - Organisations that assist us to conduct research or analyse data, including undertaking customer segmentation for marketing purposes
 - Collections Agencies
 - Organisations with whom we have commercial arrangements
- service providers who provide installation, maintenance, meter reading and other services related to metering

We take all practicable measures to ensure that these third parties are bound by privacy obligations in relation to your personal information. We may also use and disclose your personal information where required or permitted by law (e.g. to a law enforcement agency, government and regulatory authorities, or an industry ombudsman). We may share your aggregated and anonymous information in a variety of ways, including to publish trends about energy use and conservation, to help utilities provide demand-response services, to provide data to Government and industry bodies, and to improve our integrated pool system. We have taken steps to ensure that the information is not personally identifiable, and we require any individual or business we share this information with to keep all information in its anonymous form. Your personal information may be sent to authorised personnel in the United States who are bound by this privacy policy. Some of our contractors and suppliers to whom your personal information may be disclosed are located in the United States.

Recorded Phone Calls

We do record and monitor phone calls for training, compliance and service purposes. The recorded phone calls are stored in our third-party data base with only authorised staff members being able to access them.

Integrity, Access to and Correction of Personal Information

We endeavour to ensure that the personal information we hold about you is correct. If you believe that personal information about you is inaccurate, incomplete, out of date, irrelevant or misleading, please provide us with your request for correction. Under the Privacy Act, you have a right to seek access to information which we hold about you. If you wish to access the personal information that we hold about you, please contact us so we can explain how we will handle your access request. Once we have verified your identity, we would generally provide you with a summary of the information held about you. For legal and administrative reasons, we may also store records containing personal information in our archives. Please note that in some circumstances we may need to limit your access, particularly if that access would disclose personal information about another person, would disclose commercially sensitive information, or be unlawful. You can tell us if you do not consent to receive Pooled Energy products and services marketing offers by contacting us at the. Our contact details are in this Policy in the 'How to Contact Us' section.

Complaints with regard to Privacy

Should you have any concerns or complaints about the way we have handled your personal information, please write to us at the postal address below providing details of the situation or incident. We will investigate your concern or complaint, endeavour to resolve it, and respond to you in writing within 30 days. If you are dissatisfied with the outcome of our investigation, you may take your privacy-related complaint to the Energy and Water Ombudsman (EWON and EWOQ) and/or the Office of the Australian Information Commissioner (OAIC). EWON offers a free dispute resolution service for NSW electricity customers and EWOQ offers a free dispute resolution service for QLD electricity customers.

You can contact EWON by phone on 1800 246 545 or by submitting a complaint [online](#).

You can contact EWOQ by phone on 1800 662 837 or by submitting a complaint [online](#).

For information on making a complaint to OAIC, please submit a complaint [online](#) or phone 1300 363 992

Credit Reporting Policy

From time to time, we may request credit reports from credit reporting bodies. These reports contain information which help us assess your application for credit with us, including information about your credit history with other credit providers. Credit reports are designed to assist credit providers to accurately assess an individual's ability to repay credit. Pooled Energy may request a report from a credit reporting body, by providing information to the credit agency that identifies you.

We disclose information to the following body: **Equifax Australia Information Services and Solutions Pty Limited** (formerly known as Veda Advantage Information Services & Solutions Limited) This agency are required to have a policy detailing how they will manage your personal information. You can contact them directly on the details above to find out more about how they manage your information.

Phone: 138 332

Mail: Attention: Public Access Division

Equifax Australia

PO Box 964

North Sydney NSW 2059

Email: membership.queryau@equifax.com (<mailto:membership.queryau@equifax.com>)

Web: www.equifax.com.au

Changes to this Privacy Policy

From time to time this Privacy Policy may be updated, and you should refer to our website for the most up to date version. A downloadable PDF copy of our Privacy Policy is located on our website and can be viewed at <https://pooledenergy.com.au/privacy-policy/>

How to Contact Us

If you have any questions about how we handle your personal information, would like a copy of this Privacy Policy sent to you, would like to change your contact preferences, or need any further information, please contact us by:

Telephone: 1300 364 703

Post: 110 Pacific Highway St Leonard's NSW 2065

Email: info@pooledenergy.com.au

Website: pooledenergy.com.au

