
Privacy Policy

The regulatory framework

The Australian Privacy Principles (Principles) contained in the Privacy Act 1988 (Privacy Act). The Principles are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is managed.

Smart Urban Properties Australia Pty Ltd and its subsidiaries (collectively referred to as SUPA) are committed to managing personal information in accordance with the Principles and Privacy Act. This document sets out our policies for managing personal information and is referred to as our Privacy Policy.

About SUPA

SUPA comprises a number of divisions and we offer services in embedded networks, energy, fiber networks, security, smart homes and property management platforms.

Collection of personal information

When you enquire about our services or when you become a client of SUPA, a record is made which includes your personal information.

The types of personal information that we collect will vary depending on the circumstances of collection.

The types of personal information that we collect may include information about:

- Customers full legal names, email, postal address and other contract details.
- Credit card details
- Pet and vehicle licence plate details
- Login details (username and password)
- App usage data
- Tracking and cookies data
- In relation to prospective employee or employees we collect personal details and contact information, qualifications, work history, tax file number and superannuation.
- personal contacts with other corporate clients or suppliers
- any other personal information you provide to us, or authorize us to collect as part of your interaction with SUPA.

The types of personal information (including historical information) we collect for account management include your name, contact details, identification information, organisation, positions held, information in forms you submit,

payment details and enquiry/complaint details. We also collect metering data and personal information about your interactions and transactions with us, including any contact we have with you by telephone, email or online.

We may collect your health information or organisational affiliation to determine your eligibility for specific discounts, services or treatment (e.g. concessions, life support or hardship). We will confirm that you have consented prior to collecting, using or disclosing your sensitive information, unless the collection of the information is required or authorised by law. Sensitive information is information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, genetics, biometrics or health.

Some personal information is collected under laws including a range of energy industry laws applicable to us. For example, we are required to record information we are provided about customers on life support as these customers have a special need for continuity in their power supply.

This information is collected in a variety of ways, including by way of personal contact such as business activities and events. Also mail, telephone, email and online. Except where indicated our websites do not provide systems for secure transmission across the internet. We may monitor and record your communications with us (including email and telephone).

We may also collect and use personal information available from other public sources such as telephone listings, and from other third-party sources including where it is necessary to identify customers. For example, builders and real estate agents may provide details of new occupants and tenants who are using gas and/or electricity.

Where you provide us with personal information about someone else you must have first obtained their consent to provide their personal information to us based on this Privacy Policy.

Recording and images

In some circumstances we may take images or audio-visual recordings which identify you. This usually occurs when you participate in an event we are managing or delivering.

Use and disclosure of personal information

SUPA collects personal information reasonably necessary to carry out our business, to assess and manage our client's needs, and provider services offered by SUPA. We may also collect information to fulfil administrative functions associated with these services .

For our normal business dealings, SUPA may use or disclose personal information for the following no exhaustive purposes:

- provide our products and services to customers including customer care and support and detecting, preventing and addressing technical issues;
- to understand you and meet any personal requirements.
- process payments and refunds;
- verify your identity and personal information;
- maintain and update our records and to carry out other administrative tasks;
- communicate and manage our relationship with you and your organisation;
- help manage and enhance our products and services, including monitoring usage of our products and services, conducting surveys and other research;

- deal with your applications, enquiries and concerns;
- prevent, detect, investigate and deal with unlawful activity and misconduct (whether actual or suspected); and
- comply with legal obligations and protect our lawful interests.

We may not be able to do these things without your personal information.

We may also use and disclose your personal information in connection with acquisitions or potential acquisitions of our business.

We also use your personal information to promote and market products and services to you, including through telephone and electronic methods such as email, SMS, websites and mobile apps. This is to keep you informed of products, services and special offers and may continue after you cease to acquire services from us.

We may exchange personal information with:

1. cloud services. Your login information to our platforms may be transferred to and maintained on third party cloud services which operate outside of Australia where data protection laws may differ.
2. service providers and specialist advisers who have been contracted to provide installation and maintenance, meter maintenance and reading, administrative, financial, research, archival, auditing, accounting, customer contact, sales, legal, business consulting, banking, payment, credit management, debt collection, delivery, data processing, data analysis, information broking, research, marketing, investigation, website, technology or other services;
3. other energy retailers for example in connection with migrating your services or where we are a service provider to them;
4. the Australian Energy Market Operator (AEMO) which manages energy supply, demand and capacity in accordance with applicable regulation;
5. the Australian Energy Regulator (AER) which manages auditing and compliance requirements for network exemption applications and approved holders with regard to customer informed consent in accordance with applicable regulation guidelines,
6. insurers, lawyers, courts, tribunals and regulatory authorities (including the Australian Tax Office) as required or authorised by law or in accordance with their reasonable information requests;
7. insurance investigators; or
8. any escalated dispute resolution body authorised on your behalf
9. your representatives and anyone else authorised by you, as specified by you or the contract.

Management of personal information

We understand that your personal information may change frequently with changes of address and any personal circumstances. You can help us to ensure that your personal information we hold about you is accurate and up-to-date. Please contact us promptly by a method set out in Section 7 of this Policy to inform us of any changes to that may occur to your personal information.

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We have implemented a range of measures to protect the security of that personal information. We are also required by law to take reasonable steps to destroy or de-identify personal information when no longer needed for any permitted purpose in our day to day business operations.

Accessing and correcting your personal information

Under the Principles, you may have the right to obtain access to personal information which we hold about you and to advise us of any perceived inaccuracy. We will consider any recommendation by you to change or correct information and advise you of the action taken.

You may also request to access your personal information by contacting us by a method set out in Section 7 of this Policy. Depending upon the personal information you seek, you may be asked:

- to complete an Information Request Form
- to verify your identity in writing, and/or
- if the inquiry involves extensive administration time or resources, to pay a fee. If this is the case, we will advise the likely cost in advance and can help refine your request if required.

Please note that in circumstances prescribed by the Privacy Act, you may be refused access to or correction of your personal information (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals). In these circumstances we are required to provide you our reasons and if you request, make a note of your requested correction with the relevant information.

Complaints about an interference with privacy

If you consider that any action taken by SUPA breaches this Privacy Policy or the Principles, you can make a complaint by contacting us by a method set out in Section 7 of this Policy. We will endeavour to act promptly in response to any complaint. More details about our complaints process generally are set out in the [Complaints and Dispute Resolution Policy](#). If your privacy concerns are not resolved to your satisfaction, you may contact your relevant energy industry ombudsman within your jurisdiction to handle privacy complaints, including:

- For energy related issues -[Energy and Water Ombudsman Victoria on 1800 500 509](#) ,[Energy and Water Ombudsman SA on 1800 665 565](#) , [Energy and Water Ombudsman NSW on 1800 246 545](#) , [Energy and Water Ombudsman Western Australia on 1800 754 004](#)
- For all other services , [The Office of the Australian Information Commissioner on 1300 363 992](#)

How to Contact us

You can contact SUPA about a privacy-related issue by emailing us at privacy@supau.au.

Version Control

This process will be reviewed and updated on an annual basis or when there are changes in the relevant laws and rules. The version control will be handled by the Legal Department, with a clear record of changes made, the reason for changes, and the date of changes.

Version: 1.0

Last Review: 23 July 2024

Next Review: 23 July 2025

Changes Made: N/A

Reason for Changes: N/A

Version	Amendment	Author and date
Version 1	Initial draftN/A	23 July 2024



SUPA acknowledges the Traditional Custodians of the Lands on which we operate throughout Australia, and recognise their continuing connection to the land, waters and culture. We pay our respects to them and to Elders, past, present and emerging.

