



# PRIVACY POLICY

Last updated July 2023

## Introduction

This privacy policy explains what information we collect about you and how we use and share that information.

This privacy policy also contains our *credit reporting policy*, which explains how we manage credit information and credit eligibility information.

We may update this policy from time to time. Any changes to the policy will be effective on the date the updated policy is published on our website.

## Who we are

More Telecom Pty Ltd (ACN 165 518 589)

## Our contact details

- Phone: 1800 733 368
- Email: [privacyofficer@moretelecom.com](mailto:privacyofficer@moretelecom.com)
- Address: Level 6, 132-138 Albert Road, South Melbourne 325 Victoria
- Web site: [www.moretelecom.com.au](http://www.moretelecom.com.au)

## Credit notifiable matters

If there are any Credit Reporting Bodies (**CRB**) to which we are likely to disclose your credit information, our web site also contains information about credit reporting, including details of each CRB and a statement of 'notifiable matters' that explains:

- that the CRB may include the information in credit reports;
- that we may disclose certain credit defaults to the CRB;
- how to obtain the credit-related information management policies of us and the CRB;
- your right to access and seek correction of credit-related information about you, and make a complaint;
- your right to ask the CRB not to use credit reporting information to facilitate direct marketing;
- your right to ask the CRB not to use or disclose credit reporting information about you where there may have been fraud.

You can ask for the statement of notifiable matters in an alternative form, such as a hard copy.

## Personal information

“Personal information” refers to information or an opinion about a living person who is identified or reasonably identifiable, whether or not true and whether or not recorded in material form.

For the purposes of the *Telecommunications Act 1997* (Cth), “personal information” also refers to information retained for the purposes of

that law, if the information relates to an individual or a communication to which the individual is a party.

### Collecting personal information

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

In other cases, we may collect personal information about you from:

- publicly available sources like phone directories
- 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 providers when you use a roaming mobile service)
- credit reporting bodies, credit providers, fraud checking agencies
- 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*” section below.

### Collection under law

We may be required to collect personal information under the *Telecommunications Act 1997* (‘Telecommunications Act’) and other laws. For example, if we supply a pre-paid public mobile telecommunications service, we are required by law to carry out an identity check, and if your service is to be transferred to us from another service provider, additional identity check rules apply.

We must also collect information that verifies your identity when you request certain changes to your service or your account.

We may also be required to collect information, relating to an individual or a communication to which an individual is a party, under the ‘data retention’ provisions of the *Telecommunications (Interception and Access) Act 1979* (‘Data Retention Law’).

### Kinds of personal information we collect and hold

Broadly, 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 authorised representative you appoint
- *Data Retention Law details* (where that law applies) like subscriber and account details, service details, details about telecommunications devices, the source and destination of communications, the date and time of communications and connection to services, the type of a communication or service and location details.

In any case, we only collect personal information that is reasonably necessary to support our functions and activities.

### **Holding personal information**

We hold personal information in hard and/or soft copy at our offices and in other facilities that we own or license or access from third parties, like data centres. We take reasonable steps to keep it secure and to protect personal information from unauthorised access, use or alteration. Where required by the Data Retention Law, personal information will be encrypted.

### **Why we collect and hold personal information**

We collect and hold personal information because:

- we may need to use it to operate our business
- we may need to provide it to other parties in connection with our business
- we may need it for identity verification purposes when you seek to access your account online or by telephone or to make changes to your service or account
- we may need it to comply with the law, including the Data Retention Law.

### **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 or, in some cases, we may not be able to make requested changes to your service or account.

### **Using personal information**

We may use personal information:

- to identify you, including where we are required to verify your identity when activating a service, or accepting a transfer of a service from another service provider, or actioning requested changes to your service or account
- for credit checks
- 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 monitor, manage, test and improve our network and facilities
- to comply with various laws that apply to us, including the Telecommunications Act, the Data Retention Law and our obligations under any carrier licence that we hold
- for other 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, including where we are required to verify your identity when activating a service, or accepting a transfer of a service from another service provider, or actioning requested changes to your service or account
  - credit-related matters like credit rating, creditworthiness and credit provision
  - credit management
  - service provisioning
  - installation, maintenance and repairs
  - helpdesk and enquiries
  - support and complaint management
  - communications and mailing
  - billing, debt recovery and credit management
  - network and product design and maintenance
  - corporate strategy
  - legal and regulatory advice and compliance
  - accounting and financial planning
  - risk management
  - otherwise providing goods and services that we use to operate our business and provide products and support to you
- to your authorised representative/s
- if you ask us to do so
- to our agents, dealers and members of our corporate group
- to our business partners and wholesale suppliers
- to other telecommunication and information service providers that interact with us in providing products to you (eg overseas when you use a roaming mobile service)
- to the manager of the Integrated Public Number Database, the Australian Communications and Media Authority, the Telecommunications Industry Ombudsman, police, law

enforcement and national security agencies and other authorities when and as required by law

- to authorised agencies under the Telecommunications Act and the Data Retention Law
- 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 eg India, US and the Philippines and countries where you use roaming services while travelling.

Where you have told us that you are a Commonwealth Bank customer, we may also disclose your personal information to the Commonwealth Bank, who may send or provide you with information about our products, services and offers on our behalf.

The Commonwealth Bank will handle your personal information in accordance with its privacy policy available on its website. However, the Commonwealth Bank will not use of any of your personal information disclosed to it by us for the purposes of sending you direct marketing about its own products, services or offers.

## **Direct marketing**

Where you have opted-in to receive information about our products, services and offers, we may use and disclose your personal information for the purpose of sending such information to you. We may also engage our agents and business partners (such as CommBank) to send information about our products, services and offers to you. Information may be sent to you by:

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

You may unsubscribe from receiving information about our products, services and offers at any time by following the “unsubscribe” directions set out in our emails or SMS or by calling the number in the *Contacting us* section below).

To stop receiving information about our products, services and offers sent to you by our business partners (such as CommBank), you may need to unsubscribe from receiving such information directly with our business partners. Details on how to unsubscribe will be set out in the communications sent to you by our business partners.

## **Accessing and correcting personal information**

You have a right to request access to or correction of your personal information held by us. If you wish to access, correct or update any personal information we may hold about you, you can contact us by phone or email as set out in the “Contacting us” section below.

We may charge for providing access to this information and we may refuse access where the Privacy Act allows us to do so.

### Complaints

If you wish to complain about a breach of the Australian Privacy Principles, 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.

### Contacting us

Questions, requests and complaints regarding our Privacy Policy or our compliance with privacy laws should be directed to us by telephone on 1800 733 368 or email to [privacyofficer@moretelecom.com](mailto:privacyofficer@moretelecom.com).

## CREDIT REPORTING POLICY

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### Credit information

This refers to information such as:

- identification information
- basic details of a credit account (eg establishment date)
- details of enquiries we make to Credit Reporting Bodies (**CRBs**) about you
- details of some overdue payments and serious credit infringements and of payments or later arrangements in relation to either of these
- publicly available information like bankruptcy and court judgments for debts,

more fully defined in the Privacy Act.

### Credit eligibility information

This refers to credit information (together with other credit-related information that CRBs derive from it) we obtain from a CRB together with credit-related information that we derive from it, and is more fully defined in the Privacy Act.

### Dealing in credit-related information

If we provide credit, as defined in the Privacy Act, we may collect and deal in credit information, credit reporting information and credit eligibility information (eg if we supply equipment on credit terms or a post-paid product).

### Collecting credit information

We may collect credit information in the same way as other personal information. See *Collecting personal information* above for details.

### Collecting credit eligibility information

We may collect credit information from CRBs and other credit providers.

**Holding credit-related information**

We hold and protect credit information and credit eligibility information in the same way as other personal information. See *Holding personal information* above.

**Using credit information**

We use credit information in the same way as other personal information. See *Using personal information* above.

**Using credit eligibility information**

We use credit eligibility information in ways permitted by the Privacy Act and the Credit Reporting Privacy Code, such as:

- processing credit applications
- managing credit we provide
- helping you avoid defaults
- collecting credit-related debts you owe us
- dealing with serious credit infringements
- participating in the credit reporting system
- transferring our debts to third parties
- dealing with complaints relating to credit or credit reporting
- for regulatory compliance purposes
- in accordance with laws.

**Disclosing credit information**

We may disclose credit information:

- in the same way as other personal information. See *Disclosing personal information* above; and
- to CRBs, which may disclose it to other credit providers.

**Disclosing credit eligibility information**

We may disclose credit eligibility information for purposes permitted by the Privacy Act and the Credit Reporting Privacy Code, such as those detailed in *Using credit eligibility information* above.

Some of these disclosures may be to parties based overseas, including in India and the Philippines.

**Notifiable matters**

Under the Credit Reporting Privacy Code, there are several 'notifiable matters' that we are required to disclose to you at or before the time of collecting personal information that is likely to be disclosed to a credit reporting body. These matters are as follows:

- the credit reporting body may include the credit information we provide to it in reports, which it then provides to other credit providers to assist those other credit providers to assess your credit worthiness,
- if you commit a serious credit infringement, we may disclose this to a credit reporting body;
- you can request a copy of this Credit Reporting Policy by [contacting us](#), or obtain it directly from our website;
- you have the right to access credit information we hold about you, request that we correct the information, and make a complaint, as set out further in the remainder of this Credit Reporting Policy;
- you can request a credit reporting body not to use your credit

reporting information for the purposes of pre-screening of direct marketing by us; and

- you can request a credit reporting body not to use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud.

**Accessing and  
correcting credit  
information or credit  
eligibility information**

Please contact us for these purposes using the details in *Contacting us*. 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 about credit  
compliance**

If you wish to complain about a breach of Part IIIA of the Privacy Act or the Credit Reporting Privacy Code, please contact us using the details in *Contacting us*. We shall:

- acknowledge your complaint within seven days, and sooner if practicable
- try to investigate and resolve the matter within 30 days
- explain any delay if we need more time, and seek your agreement (but if you do not agree, we might be unable to finalise the matter)
- communicate, if necessary, with any other credit provider or CRB relevant to the matter.

If you are dissatisfied with the result of a complaint, you may escalate it to any external dispute resolution scheme (**EDR**) we are a member of, the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) or the Telecommunications Industry Ombudsman ([www.tio.com.au](http://www.tio.com.au)).