

This statement is the privacy policy of eSim Networks. It sets out how we manage your personal information and other information. Before we go into the detail, we need to define a few terms. This bit can get a bit technical, so please bear with us:

Your information: When we refer to your information, we are referring to both your personal information, as defined under the Privacy Act 1988 (Cth), and any customer information protected by Part 13 of the Telecommunications Act 1997 (Cth).

Sensitive information: The Privacy Act 1988 (Cth) defines some types of personal information as sensitive. We don't commonly collect sensitive information, which includes information about a person's race, ethnic origin, political opinions, health, religious or philosophical beliefs and criminal history. In the event we require any sensitive information we would only collect this with your permission, and we will only use it for the purpose for which you provided it.

Credit Reporting Policy: This sets out how we manage your credit information and credit eligibility information where this is relevant to you, and is our credit reporting policy for the purposes of Part IIIA of the Privacy Act.

The kinds of information we collect and hold

Depending on the particular circumstances, we may collect and hold a range of different information about you. This can include your name, date of birth, contact details (including address, email address, phone number or mobile telephone number), occupation, driver's licence number, username or password, financial information (such as credit card or bank account numbers) and information about how you use our products and services.

This is not an exhaustive list. For example, we may sometimes need to collect additional information as part of a user authentication process, such as when you want to speak to one of our customer service personnel who need to access your account. We may also need to collect additional information from you, such as limited health information to provide priority assistance services or a Centrelink customer reference number to provide you with a pensioner discount.

You might also need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them about this statement.

How we collect your information

We may collect your information in a number of ways, including:

- directly from you (such as where you provide information to us when you visit one of our stores or websites, complete an application form or agreement for one of our services, or contact us with a query or request)
- from third parties such as our related entities, business or commercial partners, credit reporting bodies (for more details see our Credit Reporting Policy below), wholesale or other customers, or your representatives
- from publicly available sources of information
- from our records of how you use your eSim Networks products or services
- when legally authorised or required to do so, for example, when we need to undertake identity checks for pre-paid public mobile telecommunications services under the Telecommunications (Service Provider — Identity Checks for Prepaid Mobile Carriage Services) Determination 2013

- from the third parties we list in the section of this Statement with the heading When we disclose your information
- as required under the data retention provisions of the Telecommunications (Interception and Access) Act 1979 (Cth)

If you choose not to provide certain information about you, we may not be able to provide you with the products or services you require, or the level of service on which we pride ourselves.

We may also collect information from you online.

How we hold your information

We may store your information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We take the privacy and security of your information seriously and we are committed to maintaining the security of your information under our control. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure.

While we take these steps to maintain the security of your information, you should be aware of the range of information security risks that exist today and take appropriate care to help safeguard your information. We encourage you to read some of our helpful tips and hints on how to protect your information through **digital safety**, available on our website.

How we use your information

We may use your information for a range of different purposes, including:

- to provide products and services to you, to provide you with information about those products and services, to assist you with enquiries or purchases, to enhance your experience of our products and services, and to provide you with better customer service
- to administer and manage the products and services we provide to you, to charge and bill you for them, and to collect any amounts you may owe us
- to gain an understanding of your information and communication needs, to improve or develop our products and services, or to perform research and analysis to monitor network use, quality and performance, and to operate, maintain, develop, test and upgrade our systems and infrastructure
- to verify your identity or to conduct appropriate checks for credit-worthiness and for fraud
- as required or authorised by law (including under the Telecommunications Act 1997 (Cth) and the Telecommunications (Interception and Access) Act 1979 (Cth)).
- to produce and distribute an alphabetical public number directory (known as the White Pages) in compliance with our Carrier Licence Conditions
- as required by or in accordance with any industry code or industry standard registered under the Telecommunications Act 1997 (Cth).

How we use your information for Direct Marketing

We may also use your information so that we, our related entities, dealers and other business or commercial partners can promote and market products, services and special offers that we think will be of interest to you (which may include products, services and offers provided by a third party). This marketing may be carried out in a variety of ways (including by email, SMS/MMS, or social media or by customising on-line content and displaying advertising on websites) and may continue after you cease acquiring any products or services from us until you opt-out. You may opt out by calling eSim Network support Ph: 1300 590 855 we will update your preference.

When we disclose your information

We may disclose your information to third parties who provide services to us, including organisations and contractors that assist us with the purposes for which we use your information. These services include:

- customer enquiries and support services
- installation, maintenance and repair services
- mailing operations, billing and debt-recovery functions
- information technology and network services
- market research, marketing, telemarketing and door-knocking services

We may also disclose your information:

- to your authorised representatives or advisers, or when you ask us to do so
- to credit-reporting bodies (for more details see our Credit Reporting Policy below) and fraud-checking agencies, and to credit providers for credit related purposes such as credit-worthiness, credit rating, default listing, credit provision and financing
- our dealers, our related entities or our business or commercial partners
- to other telecommunication and information service providers or to our wholesale and other customers from or through whom you may acquire products or services (for example, we may need to disclose your information for billing purposes)
- to the manager of the Integrated Public Number Database, and other organisations as required or authorised by law
- to the Government's National Document Verification Service, to verify the validity of any Government issued documentation you provide as proof of identity ie: to check a Drivers Licence, Medicare, Passport ect.
- as required or authorised by law, including to law enforcement and national security agencies, and other government and regulatory authorities
- to third parties who assist us to manage or develop our business and corporate strategies and functions, including our corporate risk or funding functions
- for the purposes of facilitating or implementing a transfer/sale of all or part of our assets or business
- to our contractor, Sensis, to enable us to meet our Carrier Licence Conditions to produce and distribute an alphabetical public number directory (known as the White Pages). Note, if you have requested a silent line number your number won't be published in the White Pages.

- to third parties as required by or in accordance with any industry code or industry standard registered under the Telecommunication Act 1997 (Cth).

In some cases, the organisations to who we may disclose your information may be based outside Australia. For example, we may disclose your information to our service providers in Canada, China, Hong Kong, countries within the European Union, India, Japan, Malaysia, New Zealand, Philippines, Russia, Singapore, South Africa, South Korea, Sri Lanka and the United States of America.

About this Statement

This Statement has been issued by eSim Networks, effective as at 31 July 2016. From time to time, we may need to change this Statement. If we do so, we will post the updated version on our **website** (www.esimnetworks.com) and it will apply to all of your information held by us at the time.

Credit Reporting Policy

This credit reporting policy relates to eSim Networks and to our related entities that are deemed to be credit providers or affected information recipients for the purposes of the Privacy Act 1988 (Cth).

We may provide credit as contemplated in the Privacy Act to our customers in connection with our products and services (for example, post-paid accounts) and, as a result, we may collect credit information and credit eligibility information about you as referred to in the Privacy Act. Our Credit Reporting Policy sets out how we manage that information.

How we collect and hold credit information and credit eligibility information about you

Credit information relates primarily to your credit related dealings with us and covers various types of information that can be collected by Credit Reporting Bodies (**CRBs**) that report on consumer credit worthiness.

Credit information includes:

- identification information
- basic information about your credit account (for example when it was opened)
- details about information requests we make about you to CRBs
- information about certain overdue payments, default listings and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these
- various publicly available information like bankruptcy and credit-related court judgements

We may collect credit information about you in any of the circumstances relating to other personal information described in our Privacy Statement under **How we collect your information**. Credit eligibility information is information equivalent to the kinds listed above that we generally collect from CRBs.

This information relates primarily to your dealings with other credit providers (for example, banks, other financial institutions, or other organisations that may provide you with credit in connection

with their products or services). It may also include certain credit worthiness information that we derive from the data that we receive from a CRB. Sometimes we may also collect credit eligibility information about you from other credit providers.

We store and safeguard your credit information and credit eligibility information in the ways described in our Privacy Statement under **How we hold your information.**

How we use and when we disclose your credit information and credit eligibility information

We may disclose your credit information to CRBs. Those CRBs may then include that information in credit reporting information that they provide to other credit providers to assist them to assess your credit worthiness.

We may also use and disclose your credit information for other purposes and in other circumstances as described in our Privacy Statement under **How we use your information** and **When we disclose your information**, when permitted to do so by the Privacy Act.

Our use and disclosure of credit eligibility information is regulated by Part IIIA of the Privacy Act and the Credit Reporting Privacy Code. We will only use or disclose such information for purposes permitted by these laws, such as:

- processing credit-related applications and managing credit that we provide
- assisting you to avoid defaults
- collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements
- assigning our debts
- participating in the credit reporting system
- dealing with complaints or regulatory matters relating to credit or credit reporting
- when required or authorised by another law.

In some cases, the people to whom we may disclose your credit information or credit eligibility information may be based outside Australia – for more information please see the details in our Privacy Statement under **When we disclose your information.**