

HARBOUR ISP PRIVACY POLICY

February 2018



Our Commitment

This statement is our APP Privacy Policy which sets out how we manage your personal information and other information. Harbour ISP complies with the new Australian Privacy Principles (APPs), which came into effect on 12 March 2014. To meet the APPs, we have updated our:

- privacy policy, and it is now the APP Privacy Policy;
- collection notices (including contracts, application forms, and other documents where personal information is collected);
- external communications; and
- internal processes.

Harbour ISP recognises the importance of maintaining the confidentiality of our customers' personal information.

What is classified as personal information?

This includes: name, date of birth, current address, previous addresses, telephone numbers, e-mail address, occupation, driver's license number, credit reference reporting, bank account details, credit card details, logon identification numbers, pin numbers, passwords, security codes, geo-location or other electronic identifier. This is not an exhaustive list, for example we may require additional information to authenticate users, authorised representatives etc.

How we collect your information

Harbour ISP has various ways in which we collect information, including but not limited to:

- Information provided through the completion of application/registration forms for products/services we provide;
- Information you enter on our website;
- From third parties such as related companies; credit reporting agencies;
- Directly from you via phone/e-mail/letters;
- From our existing records on how you use our services;
- From publicly available sources of information (eg phone directories)
- Direct Marketing Companies.

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

How we use your personal information

We assure you we only collect personal information that is necessary for us to carry out the various functions and activities we undertake for the benefit of our customers. We take all possible steps to ensure that customer information is not disclosed or accessed by unauthorised parties.

Where information disclosure is necessary to fulfil our business commitments to you we may disclose information to persons involved in administering the services, our related entities and business partners.

Sensitive information is only disclosed as authorised or required by the Telecommunications Act 1997 (Cth) and other laws applicable to us.

We may also use your information so that we, our related entities and other business 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 contacting us as detailed in "How to contact us" below.

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

- When providing the products/services you request;
- To conduct credit-worthiness checks through credit reporting agencies;
- As detailed in the section "Credit Reporting" below
- For possible fraud investigations;
- For cross marketing by informing you of other services available to you within the range of Harbour ISP products;
- For the distribution of newsletters/flyers;
- To provide upgrades/maintenance to our products/services;
- To government and regulatory authorities and other organisations, as required or authorised by law;
- For financing products supplied by Harbour ISP.

- In some cases, the organisations that we disclose your information, including credit information, to may be based outside Australia, for example we may disclose your information to our service providers in the Philippines. All such information that is provided is used solely for of marketing and providing the group's products within Harbour ISP.

Re-marketing and tracking cookies

Harbour ISP also uses 3rd party vendor re-marketing tracking cookies, including the Google Adwords tracking cookie. This means we will continue to show ads to you across the internet, specifically on the Google Content Network (GCN) and Google Display Network (GDN). As always, we respect your privacy and are not collecting any identifiable information through Google's or any other 3rd party remarketing system.

The third-party vendors, including Google, whose services we use – will place cookies on web browsers to serve ads based on past visits to our website. Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

Credit reporting

We collect, hold and use, information related to your commercial and consumer creditworthiness from Dun & Bradstreet (internet: www.dnb.com.au, email: pac.austral@dnb.com.au, telephone: 1300 734 806), a credit reporting body, for all purposes permitted by law. We also disclose information to them. This activity is conducted for assessing your credit capacity, eligibility or history in connection with an application or an obligation as a guarantor, collecting payments from you, and managing our credit relationship. Creditworthiness information includes information that is both positive (like payment information) and negative (like defaults or serious credit infringements that we may disclose to credit reporting bodies if you fail to pay us).

Data security

Harbour ISP will take all reasonable steps to keep our customer's personal information secure. Staff are trained to respect privacy and confidentiality of customer information. You can also help us keep your personal information secure by ensuring that any passwords that you use on our web sites are kept strictly confidential, and by always logging off if you are using a shared computer. Please notify us immediately if there is any unauthorised use of your account.

Keeping the information we hold about you up to date

Harbour ISP take all reasonable steps to ensure the information we hold about you is accurate and up-to-date. For us to maintain up-to-date information, please assist us by notifying us if your details need updating (e.g. you have a new address or have changed your name). Harbour ISP shall, if requested by the individual, take all reasonable steps to update and correct all personal information held in our customer records. Please contact us as detailed in the Queries tab if you wish to correct or update our records.

How to contact us

If you would like to contact us about a Privacy issue, for example:

- you have any questions in relation to this statement or our management of your information,
- you would like to know what personal information we hold about you
- you would like to correct any information we hold about you
- you would like to stop receiving marketing material from us
- you would like us to send you a copy of our APP Privacy Policy
- you want to make a complaint relating to a Privacy issue

Then please contact us by phone, email or mail:

Harbour ISP
 Mail: 27 Craigmoor Rd, Mudgee NSW 2850
 Phone: 1300 366 169
 Email: customercare@harbourisp.com.au

We will respond as quickly as possible, generally within 3 business days.

There is no early termination charge (ETC) if you chose a No Contract option. If you are contracted to Harbour ISP on a 12 or 24-month contract and you cancel your service, you will be charged an ETC of up to \$350 or you will have to pay out the remainder of your contract, whichever is the lesser amount. The customer may request disconnection of the service at any time in writing, however, Harbour ISP require 30 days written notice to process the termination of the contract. A pro-rata invoice will be raised to cover any days in the 30-day period which falls after the end of the current billing period.

How to make a complaint regarding our compliance with the Privacy Act

If you think that we have not complied with the Privacy Act you can make a complaint by using the contact details as above.

We will acknowledge your complaint in writing as soon as practicable within 7 days. We will aim to investigate and resolve your complaint within 30 days of receiving it. If we need more time, we will notify you about the reasons for the delay and ask for your agreement to extend this 30-day period. While we aim to resolve all complaints without needing to involve third parties, if you are not satisfied with the outcome of your complaint you can make a complaint to the Australian Information Commissioner (www.oaic.gov.au).