



Privacy Policy

(Including Credit Reporting Policy)

(Last updated 30 March 2022)

We understand that you place a high value on your privacy, and we are committed to ensuring that your personal information is protected and secure.

This policy sets out what personal information we collect about you, how we collect, store, use and share that information, as well as letting you know how you can manage and update, or correct, the information we hold about you. It incorporates our Credit Reporting Policy which explains how we handle your credit information.

This policy was last updated on 30 March 2022. We may need to update it from time to time and will let you know by posting an updated version on our website.

What information do we collect about you?

The information we collect varies depending on the services you acquire from us and the way you interact with us.

Personal information we collect about you

- Name, date of birth and gender.
- Contact details such as your residential (current and former) and postal address, email address and contact phone number(s).
- Employment status.
- Identity document details such as your driver's licence, passport, Medicare card or photo ID card.
- Your financial and credit information such as your credit card or bank account details or other information required to assess your application for credit.
- Your CMobile account number, password and porting pin, as well as your account number and porting pin with your former service provider where you are porting a service to CMobile.
- Information you provide directly to us about your use of the products and services we provide to you.
- Information you provide to us through surveys or competitions.
- Information you provide to us online, both directly and indirectly.

While we generally do not collect sensitive information, we may collect it in circumstances where you or an authorised representative provides it to us because you believe it is relevant to the product or service we are providing to you. In such cases, we will seek your consent before we collect and use that information unless we are permitted, or required by law, to do so.

We may also need to obtain details of other individuals such as authorised representatives or other individuals with a service on your account.

Information about how you use our products and services

We collect Information about how you use our products and services, such as:

- Phone numbers that you call or send messages to.
- The date, time and length of calls you make.
- The date and time of messages you send.
- Your location at the time of making calls or sending messages.
- Details of network faults that may affect our service to you.
- Date, time and length of your internet browsing and location at the time.
- Information related to the administration of your service such as account and payment information.
- Your device information.

How do we collect your information?

Directly from you

- When you apply for a service and complete our online form.
- When you contact us via email, phone or Messenger.

Automatically through our network or services

- When you visit our website or our online portal we may use cookies or similar technologies to collect information about you.
- When you interact with online communications.
- When you use our services.

From other sources

- Credit reporting agencies and law enforcement agencies.
- Regulators and the Telecommunications Industry Ombudsman when you submit a complaint.
- When you purchase a device from a supplier listed on our website.
- Publicly available sources of information.

How do we store your information?

We store the majority of your information electronically. In limited circumstances, such as when you send us hard copy communications, we store hard copy records in secure buildings.

We take all reasonable steps to ensure your information is stored securely and is protected from unauthorised use, access, amendment or disclosure.

We store your information in facilities that we own and operate ourselves or that are owned and operated by our third-party service providers. We ensure that all information is stored securely and that we maintain sufficient internal procedures and policies to ensure your personal information is at all times protected and secure.

We endeavour to ensure that the personal information we hold about you is as current and up-to-date as possible. We aim to delete or make anonymous any information that ceases to be relevant as soon as possible, however your personal information is retained for so long as



we are required to keep it pursuant to our legal and regulatory obligations and for our legitimate business requirements.

When we share your information

We may share your personal information to third parties who provide services to us. These services include:

- Billing and customer relationship management services;
- Information technology and network services, including fault restoration;
- Fraud and crime identification, investigation and prevention services;
- Credit reporting agencies for confirming your identity and reporting on your credit worthiness, including any default listings and financial history; and
- Law enforcement agencies and other governments and regulatory authorities where we are required to do so by law

We may also disclose your information:

- to your authorised representatives or advisers;
- where otherwise required or permitted by law; and
- to facilitate the transfer or sale of all or part of our business.

How we manage your credit information

When you apply for a service with us, we may assess your credit worthiness by requesting information from a credit reporting agency.

Information that we collect from a credit reporting agency will be sent to us and stored electronically and may include the following:

- Your personal information.
- Details of credit enquiries made by other creditors/service providers about you.
- Details about your current and former credit applications and arrangements.
- Information about any outstanding overdue payments, default listings or other serious credit infringements and the current status of those.
- Other publicly available information held by the credit reporting agency about your credit worthiness, such as any court proceedings you may be a party to and bankruptcy history.

We may conduct a credit assessment when you submit an application for a CMobile service and we are considering your application. We may also conduct a credit assessment when working with you to assist you to pay any debt owing to CMobile.

Any personal information we provide to a credit reporting agency will be stored by that agency and may be included in future credit reports provided to other creditors/service providers to assist them in assessing your credit worthiness. We may also disclose to credit reporting agencies your failure to make payments due to us or where you otherwise commit a serious credit infringement.

We may use or disclose your credit information to:

- Assess your credit worthiness for our services, including to verify your identity.
- Manage your account, including to perform debt recovery and management activities which may include the engagement of third parties to provide such services.



- Manage any complaints relating to your credit information.
- Respond to and defend any complaints made against us or our personnel.
- Prevent and protect against any fraud.
- Comply with any law or regulatory requirement.

The credit reporting agencies CMobile may work with include:

- Equifax Australian Group Pty Ltd (formerly Veda)
www.equifax.com.au
- Illion Australian (formerly Dunn and Bradstreet (Australia) Pty Ltd)
www.illion.com.au

We do not engage credit reporting agencies to provide credit information for any marketing purposes. However, you may request credit reporting agencies not use your credit eligibility information to determine where credit providers can send you marketing material.

The organisations that we disclose your information to may be based outside of Australia, or while based in Australia, they may operate parts of their business overseas. Your information may therefore be shared in the USA, Chile, the Philippines, India, Costa Rica, Ireland and New Zealand.

How we protect your information

The ongoing protection and security of your information is of paramount importance to us. Some of the measures we currently use to protect your information include:

- Providing you with an account number and requiring you to nominate a password which is required to access your account.
- Confirming your identity when you contact us.
- Ensuring our billing and payment gateway providers follow the Payment Card Industry Data Security Standard (PCI DSS) when handling your credit data.
- Using firewalls, virus scanning and encryption to protect against unauthorised access to your information.
- Ensuring access to your personal information is only provided to personnel who require it to perform their role.
- Conducting ongoing training and reviews of our systems.

How you can access and correct your information

To ensure that we can continue to provide you with the best service, it's important that you ensure the information we hold about you is complete and accurate and that you notify us of any changes to your information so that it remains current.

You also have the right to request a copy of the information that we hold about you at any time. There is no fee to request your information, but sometimes we may charge a fee to cover the time we spend gathering the information you have requested. We will let you know if there is a fee before we process the request so you can confirm you still wish to proceed with your request.

There may be cases where we can refuse to provide you with access to certain information or only provide you with access to certain information. For example, information relating to another person. In such cases, we will provide you with details for our decision in writing.



If we don't believe your information needs updating, we will let you know in writing.

If you would like to access or update your personal information, refer to the 'How to contact' us section below.

How to make a privacy complaint

If you have a concern or complaint about the way in which we have handled your information, including your credit information, please let us know and we will endeavour to resolve the issue quickly. If you are not satisfied with our response, you can lodge your complaint with the Office of the Australian Information Commissioner (www.oaic.gov.au) or The Telecommunications Industry Ombudsman (www.tio.org.au)

We will aim to acknowledge your complaint within 7 days and investigate and respond to it within 30 days. We will let you know if we believe our response will take longer than 30 days and provide you with reasons for that delay.

How to contact us

If you have any questions or a complaint about this policy or how we handle your information, or if you would like to request access to the information we hold about you, please contact us by:

- Calling us on 1300 545 000
- Emailing us at privacy@cmobile.com.au
- Sending us a letter to:
CMobile Privacy Officer
PO Box 234
BAULKHAM HILLS NSW 1755