

Privacy Policy

1. Policy Statement

At ElectraNet, we are serious about protecting Personal Information and are committed to our obligations under the *Privacy Act 1988* (Cth) and the Australian Privacy Principles. We acknowledge the importance of protecting Personal Information supplied by individuals or otherwise obtained by ElectraNet against unauthorised access, misuse and loss.

By providing your Personal Information to us, you agree to us collecting, holding, using and disclosing your Personal Information in accordance with this policy.

2. Purpose

The purpose of this policy is to outline the types of Personal Information that ElectraNet collects and how we collect, hold, use, disclose, store, secure and dispose of Personal Information in accordance with the Australian Privacy Principles. This policy also outlines the right of individuals to access and correct their Personal Information where this is held by ElectraNet.

3. Scope

This policy applies to all directors, executive, management, staff, contractors, consultants and any other party providing services to or on behalf of ElectraNet. The policy will apply to any Personal Information obtained by ElectraNet in the course of carrying out its business.

This policy is drafted in accordance with the Australian Privacy Principles, a copy of which may be obtained from the website of The Office of the Australian Information Commissioner at: <https://www.oaic.gov.au/>.

4. Terms and Acronyms

Term/Acronym	Definition
Australian Privacy Principles	means the Australian Privacy Principles contained in Schedule 1 to the Privacy Act (as amended or replaced from time to time).
Privacy Act	means the <i>Privacy Act 1988</i> (Cth) (as amended from time to time).
Personal Information	means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not, or as otherwise set out in section 6 of the Privacy Act (as amended from time to time).
Sensitive Information	means: (a) information or an opinion about an individual's: (i) racial or ethnic origin; (ii) political opinions;

Term/Acronym	Definition
	(iii) membership of a political association; (iv) religious beliefs or affiliations; (v) philosophical beliefs; (vi) membership of a professional or trade association; (vii) membership of a trade union; (viii) sexual orientation or practices; or (ix) criminal record, that is also Personal Information; or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or (e) biometric templates, or as otherwise set out in section 6 of the Privacy Act (as amended from time to time).

5. Policy Details

5.1 What Personal Information do we collect and hold?

We collect and hold Personal Information about you and your interactions with us, for example, when you use any of our services, contact us or visit our website.

Generally, the Personal Information we collect and hold may include your name, gender, date of birth, telephone number, address, email address and government-issued identifiers (e.g. Tax File Numbers or Australian Business Numbers). We may also collect other types of Personal Information. The types of Personal Information we collect will be dependent upon your interaction with us or the services we provide to you.

Some examples of the types of Personal Information that we collect include:

- contact details, bank details and licence numbers of customers and suppliers;
- contact details, bank details and property ownership / tenure details of landholders and relevant stakeholders where required in connection with the operation and maintenance of our transmission network assets, including access to land;
- contact details, education, employment and referee details, professional associations, residency status and bank details of current and prospective ElectraNet staff, contractors and consultants;
- information provided by regulators (such as the Energy and Water Ombudsman SA);
- information from responses to requests for public consultation or engagement;
- information from CCTV surveillance undertaken at our locations for security purposes; and
- information collected from publicly accessible pages on our website and social media, including information about how you access, use and interact with our website and social media. Examples of information collected are the location from which you have come to the site, the pages you have visited, and technical data (such as IP address, domain name, server address, the type of device you are using to access the website, device attributes, browser type, language and operating system).

We use cookies on our website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of our website.

Our website or social media may from time to time contain links to other sites that are controlled by third parties. You should consult the privacy policies for those other sites. Please be aware that ElectraNet does not accept responsibility for any collection or use of Personal Information by those other sites.

5.2 Why do we collect, hold and use Personal Information?

We collect, hold and use Personal Information that is reasonably necessary for the functions and activities of our business, which includes the operation of South Australia's transmission network and the provision of regulated and contracted services related to this.

We will use Personal Information for this primary purpose unless:

- you have consented to the use or disclosure of the information for another purpose;
- you would reasonably expect us to use or disclose the information for a related purpose;
- the use or disclosure is required or authorised by law or order of a court or tribunal; or
- we are otherwise permitted to use or disclose the information under the Privacy Act.

For example, we collect, hold and use your Personal Information so that we can:

- provide you with our services, and manage our relationship with you;
- identify and tell you about other products or services that we think may be of interest to you;
- contact you to respond to your queries or complaints, or if we need to tell you something important; or
- comply with our legal obligations and assist government and law enforcement agencies or regulators.

If you do not provide us with your Personal Information, we may not be able to provide you with our services, communicate with you or respond to your queries.

We may combine Personal Information we receive about you with other information we hold about you.

You may withdraw your consent to receive marketing materials from us at any time. You may do so by following the opt-out instructions provided in any electronic marketing communications from us or by contacting ElectraNet's Privacy Officer in writing (see contact details below).

5.3 How do we collect your Personal Information?

We may collect your Personal Information from you whenever you interact with us. This may be in person, through correspondence (e.g., email, letter or telephone) or through our website or social media.

We will generally collect your Personal Information from you. However, in some circumstances, we may collect your Personal Information from other sources, such as your agents or representatives,

third parties where you have asked them to provide your Personal Information to us (e.g. referees), regulatory or public bodies, publicly available databases and sources (e.g., Land Services SA) or other third parties such as our suppliers, contractors or consultants.

When we collect Personal Information, we will take such steps as are reasonable to make you aware of the purpose of collection, our usual practices with respect to the use and disclosure of that information, how you can access your information and any other legal requirements.

If you provide us with Personal Information relating to another individual, you commit to us that you have obtained that individual's consent to us collecting and using that Personal Information in accordance with this policy and the Privacy Act.

5.4 Collection of Sensitive Information

We will only collect Sensitive Information where:

- you consent to the collection and the information is reasonably necessary for the functions and activities of our business, for example, in connection with recruitment activities for ElectraNet;
- the collection is required or authorised by law or order of a court or tribunal; or
- we are otherwise permitted to collect the information under the Privacy Act.

5.5 Who do we disclose your Personal Information to, and why?

At times, we may disclose Personal Information to third parties for the purposes of our business, such as our related companies, third parties (such as our professional advisors, contractors and consultants) who assist us in providing services or who perform services for us or on our behalf, insurers, government agencies or regulators.

If we sell or buy any businesses or assets, we may disclose your Personal Information to the prospective buyer or seller of such businesses or assets to whom we assign or novate any of our rights and obligations.

We may also disclose your Personal Information where:

- we are required or authorised by law or order of a court or tribunal to do so;
- you have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to use or disclose the information under the Privacy Act.

5.6 Do we disclose your Personal Information to overseas recipients?

Your Personal Information may be disclosed, transferred and/or stored by us overseas, for example to our related bodies corporate or to cloud facilities provided by third parties. The countries in which these overseas recipients may be located may vary from time to time, and are likely to include the United States of America. When disclosing your Personal Information to overseas recipients, we take all steps that are reasonable in the circumstances to ensure that your Personal Information is treated in accordance with the Australian Privacy Principles.

When you communicate with us through a social network service, the social network provider and its partners, who may be located overseas, may collect and hold your Personal Information.

5.7 Integrity and security of Personal Information

It is important that the Personal Information held by ElectraNet is accurate, complete and up-to-date and we will take reasonable steps to ensure this. If you become aware that the Personal Information we have is not up-to-date or is inaccurate, please advise us as soon as practicable so that we can update our records.

We store most Personal Information about you in computer systems and databases operated either by us or our external service providers. Personal Information about you may also be stored in secured physical form by us or our external service providers.

We take reasonable steps to protect Personal Information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

We have in place procedures to deal with any suspected data breaches and will notify you and the applicable regulators of any breach where we are legally required to do so.

When Personal Information is no longer needed for the purpose for which it was obtained, for any secondary purposes permitted under the Australian Privacy Principles or as otherwise required by law or order of a court or tribunal, we will take reasonable steps to destroy or de-identify the information.

5.8 Access to and correction of Personal Information

You can access the Personal Information we hold about you, subject to certain exceptions contained in the Australian Privacy Principles, and can request us to update or correct it.

To request access to or the correction of your Personal Information, please contact ElectraNet's Privacy Officer in writing (see contact details below).

We will endeavour to respond to a request for access within a reasonable timeframe and provide access to the information in the manner that you request, if it is reasonable and practicable to do so. If not, we will take reasonable steps to provide access in a way that meets both of our needs.

In order to protect your Personal Information, we may require proof of identification from you before releasing the requested information. Access may be refused if permitted by law or pursuant to the Australian Privacy Principles. You will be advised of any refusal in writing.

We may also charge an administrative fee for locating, compiling or providing a copy of the relevant information.

5.9 Queries, complaints and reports

All ElectraNet directors, staff, contractors, consultants and others providing services to or on behalf of ElectraNet are obliged to:

- report any instances of suspected or actual breaches of this policy or the Australian Privacy Principles to ElectraNet (including any deliberate or inadvertent unauthorised access to, use or disclosure of Personal Information, or an 'eligible data breach' as defined in the Privacy Act); and
- comply with all reasonable directions of ElectraNet in relation to any actual or suspected breach.

If you have any questions about our management of Personal Information or would like to raise a complaint about our compliance with the Australian Privacy Principles or this policy, please contact the Privacy Officer at ElectraNet (see contact details below). We will acknowledge and consider your enquiry or complaint and use our reasonable efforts to address or respond to it promptly.

If you are not satisfied with the handling of a complaint, you can contact the Office of the Australian Information Commissioner via:

- Web: www.oaic.gov.au
- Email: enquiries@oaic.gov.au
- Phone: 1300 363 992

5.10 Contacting us

ElectraNet's Senior Legal Counsel(s) hold the role of Privacy Officer. The Privacy Officer can be contacted by:

- Phone: +61 8 8404 7966
- Email: privacyofficer@electranet.com.au
- Post: The Privacy Officer, ElectraNet Pty Limited, PO Box 7096, Hutt Street Post Office, Adelaide SA 5000.

5.11 Changes to this policy

From time to time, we may change our policy on how we handle Personal Information. Any changes to this policy will be published internally and on our website.

6. Appendices and References

Privacy Act 1998 (Cth) Schedule 1 – Australian Privacy Principles: [The Australian Privacy Principles \(oaic.gov.au\)](http://www.oaic.gov.au)

Office of the Australian Information Commissioner – Australian Privacy Principles Guidelines: [Australian Privacy Principles guidelines | OAIC](http://www.oaic.gov.au)