

Click Group Privacy Policy

January 2021

This document sets out the Click group's policy on handling the personal and credit-related information that Click and its related companies collect about individuals including customers, potential customers.

If you are a customer of Click Energy, or On The Move, this Privacy Policy applies to you.

1. Protection of your privacy and personal information

- We take the protection of your privacy very seriously. This Privacy Policy sets out how we deal with your personal information.
- Each member of the Click group is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) ("Privacy Act").
- When you use our websites or provide any personal information to us, we will manage your personal information in accordance with this Privacy Policy.

2. What personal information do we collect?

In order for us to supply services and benefits to you, we need to collect certain personal information about you. This information may include your name, address, telephone number, date of birth, email address and other contact details; bank account, credit card details, credit history and other financial details; occupation; and details of your use of our products, services or benefits.

We also collect, hold and use, information related to your creditworthiness for the purposes of assessing your credit capacity, eligibility or history in connection with an application; collecting payments from you; and managing our credit relationship. This includes information such as payment defaults or serious credit infringements that we may disclose to credit reporting bodies if you fail to fulfil your payment obligations). From time to time, you may provide us, and we may collect from you, personal information of a third party. Where you provide the personal information of a third party, it is your responsibility to ensure that these persons are aware of this Privacy Policy, understand it, and agree to accept it.

You do not have to provide us with any personal information provide you with the products, services or benefits you have requested.

Under the Privacy Act, "sensitive information" includes but is not limited to information or an opinion about an individual's racial or ethnic origin, religious belief, or criminal record and also includes health information about an individual. Where we need this information for your account (for example, to ensure continuous service to your property or to assist with translation services), we'll ask for your permission — except where otherwise allowed by law.

3. How we collect personal information

We may collect personal information in a range of ways, including:

- when you provide it directly to us, for example, by submitting it to us via our websites, via any electronic or paper forms you submit to us, or by you providing information to our representatives by telephone, email, Live Chat or any social media networks through which you liaise with us;
- in the course of providing you with a requested product, service or benefit;

- from third party service providers, business partners, including, without limitation, commercial associates or credit reporting agencies;
- from publicly available sources;
- from electronic tagging mechanisms such as cookies;
- from our records of your use of the service; and
- when we are required to do so by law, or to meet the requirements of a government body or agency, for example, when we are required to verify your identity from certain documents before supplying a product, service or benefit to you.

4. Why we collect, use and disclose personal information

We collect, use and disclose personal information about you in order to supply our products, services or benefits to our customers, or for related purposes. We collect and use your information, so we can:

- confirm your identity
- provide you with the products and services that you have asked for, including customer support
- handle payments and refunds
- communicate with you about your account
- manage your credit arrangements with us
- manage accounts that are overdue, including where we sell debt
- participate in credit reporting systems
- respond to applications, questions, requests or complaints that you have made to us
- maintain and update our records and carry out other administrative tasks
- research the usage of, and to develop and improve the capabilities of, our services
- improve customer experience and do market research
- investigate possible fraud and illegal activity
- comply with laws, including assisting government agencies and law enforcement investigations, and manage our business and assets.

5. Who we may disclose your personal information to

We may share your personal and credit reporting information with our related bodies corporate and our service providers for the purposes set out in section 4. Our service providers may be based in Australia or overseas and include commercial associates, suppliers, business partners, agents, consultants, professional advisers and the organisations set out in 6 and 7 below.

6. Use and disclosure of your personal information for identity checking requirements

We may use and disclose your personal information when legally required to do so, including for the undertaking of identity checks via third party systems. Before checking your identity details, we will confirm that you are authorised to provide personal identity details to us so that we may match those details with information held by the issuer of Official Record Holder via third party systems.

7. Use of personal information by Google Analytics and Cookies

We use Google Analytics to record information about the number of and types of visitors to our websites.

We and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimise and serve ads based on someone's past visits to our websites. We explain what cookies are, and why we use them, at 9 below. You can find out more about cookies by taking a look at Google AdSense.

You can opt-out of Google Analytics for Display Advertising and customise Google Display Network ads using the Google Ads Preferences Manager.

You can also use the Google Analytics opt-out browser add-on to instruct the Google Analytics Java script not to send any information about the website visit to Google Analytics.

We may obtain information about your general internet usage by using cookies. A cookie is a text file, which is generated by your internet browser and stored on the hard drive of your computer. Cookies help us monitor how visitors are using our website and allow us to improve our site and to deliver a more personalised web experience. Some of the cookies we use are essential for the site to operate, whereas others are aimed at enhancing and personalising your user experience.

Information collected via cookies may also be used for providing you with marketing and promotional material when you use the internet. You can control your cookies in your internet browser's settings.

8. Direct marketing

We may also use and disclose your personal information to send direct marketing to you from us, our related bodies corporate, and/or from third parties including social networking sites, commercial associates, suppliers and business partners, agents, consultants, and professional advisers.

You may opt-out of receiving this direct marketing through the unsubscribe function that will be made available to you with each direct marketing communication. Alternatively you may opt-out of receiving direct marketing for each of the following brands as follows:

Click Energy customers, by emailing service@clickenergy.com.au or by using our live chat service, or calling our service hotline on 1800 775 929.

On The Move customers, by emailing sales@onthemove.com.au or calling our service hotline 1300 850 360.

Please note that we may still send you important administrative and safety messages even if you opt out of receiving marketing communications.

9. How we store and protect personal information

We store personal information in a combination of computer storage facilities, paper-based files and other records. In doing so, we have taken steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally, we take reasonable steps to destroy or de-identify personal information when we no longer need it.

10. Sending personal information overseas

We may disclose some of your personal information to organisations outside Australia including but not limited to Canada, China, Germany, Ireland, Pakistan, the Philippines, Poland and USA for the purposes described above.

11. How you can access and correct your personal information

We will take reasonable steps to keep the information we hold accurate and up to date.

You can ask us to correct or update any of your personal information or credit-related information that we hold. If we've given the information to another party, you can ask us to let them know it's incorrect.

If we don't think the information needs to be corrected, we'll let you know why. You can ask us to include a statement that says you believe our record about you is inaccurate, incomplete, misleading or out of date.

At your request, we will provide you with a copy of any personal or credit-related information which we hold about you, unless an exception under the Privacy Act applies. We may charge a fee for retrieving this information, in which case we will inform you of the fee and obtain your agreement to that fee before providing the information.

12. How to contact us or make a complaint

If you have any questions about this Privacy Policy, wish to access or update information we hold about you, or wish to make a complaint about how we've handled your personal or credit-related information, please contact:

Privacy Officer

Level 1, 90 Collins Street
Melbourne VIC 3000
Australia

or

privacy@clickenergy.com.au

Please advise which related Click group company you are a customer of.

We will endeavour to respond to complaints within 30 days. If it will take longer, we'll let you know.

We will:

- keep a record of your complaint
- respond to you about your complaint and let you know how we will try to resolve it and how long that may take..

Should you deem the resolution as unsatisfactory, or if there is failure to respond within the 30-day timeframe, a request to review the complaint and resolution can be made.

If you are unsatisfied you can visit the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au to lodge a further complaint.

About this policy

Any personal information we hold is governed by the most current Click group Privacy Policy. This policy is reviewed from time to time to take account of new laws and technology and changes to our operations and practices, and to make sure it remains appropriate to the changing environment. You can find the most up to date version on our website.

This policy applies to entities within the Click group operating in Australia. These include Click Energy Pty Ltd and On The Move Pty Ltd.