

## **Privacy Policy**

Divine Telecom is committed to provide the consumer with the highest level of customer care which includes protecting your privacy. This Privacy Policy Statement sets out the approach that Divine Telecom takes in relation to the treatment of your Personal Information. It includes information on how Divine Telecom collects, uses, discloses and keeps secure, your Personal Information. It also covers how Divine Telecom makes the Personal Information it holds available for access to and correction by the individual.

As the privacy policy relates to your personal information that Divine Telecom collects we recommend that you keep a copy of this statement for future reference.

## **Your Personal Information**

Divine Telecom collects Personal Information primarily to supply customers with the products and services ordered from it. We will only collect Personal Information where the information is necessary for Divine Telecom to perform one or more of its functions or activities.

Personal Information held by Divine Telecom can include your name, date of birth, current and previous addresses, phone numbers including landline and mobile, email addresses, bank account details, credit card information, occupation, drivers licence number and any Divine Telecom login details and passwords. It is up to you whether you choose to supply personal information that we request from you however if you decide not to provide certain personal information we may not be able to provide you with the services you wish to ensue with Divine Telecom.

If you choose to elect an Authorised Representative as part of your service with Divine Telecom you may need to provide us with personal information about that person such as name, date of birth and the relationship that person has with you. If this is the case, we rely on you to inform that individual that you are providing their personal information to Divine Telecom and to advise them that if they have further questions they can contact Divine Telecom.

## **How Divine Telecom collects Personal Information**

Divine Telecom collects personal information in a number of ways, including:

- Directly from you, when you provide information by phone, email, application forms or when you submit your personal details through our website.
- From third parties such as our related companies, credit reporting agencies or your authorised representatives;
- From publicly available sources of information; and
- When legally required to do so, such as under relevant telecommunications legislative instruments.

Divine Telecom also collects and uses Personal Information for secondary purposes including:

- Billing and account management
- Business planning and product development
- To provide individuals with information about promotions, as well as the products and services of other Divine Telecom companies and other organisations.

Divine Telecom will notify individuals of the matters listed below before collecting any Personal Information:

- The main reason that we are collecting Personal Information;
- Other related uses or disclosures that we may make of the Personal Information;
- Our identity and how individuals can contact us;
- That individuals can access the Personal Information that Divine Telecom holds about them;
- Individuals should contact our customer service department if they wish to access, correct or alter Personal Information collected by Divine Telecom; and
- Organisations to which we disclose Personal Information to.

Where it is not practicable for Divine Telecom to notify individuals of all of the Collection Information before the collection of the Personal Information, Divine Telecom will ensure that individuals are notified of the Collection Information as soon as possible after the collection.

## **How Divine Telecom holds Personal Information**

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and we take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure.

For example, our IT Infrastructure features multiple layers of password protections, firewalls, intrusion detection and site monitoring functionalities. Further, our staff members receive regular training on our strict privacy and confidentiality procedures in relation to all personal information stored by us electronically and in printed form.

We will retain your personal information whilst it is required for our business functions or any other lawful purpose. We use secure methods to destroy or permanently de-identify your personal information when it is no longer needed.

## **How Divine Telecom uses your Personal Information**

Divine Telecom will obtain an individual's consent for use of non-sensitive Personal Information for Secondary Purposes at the time of collection. Divine Telecom will not use Personal Information without taking reasonable steps to ensure that the information is accurate, complete and up to date. Divine Telecom uses your Personal Information to:

- Verify your identity;
- Assist you to subscribe to our services;
- Provide the services you require;
- Administer and manage those services, including charging, billing and collecting debts;
- Inform you of ways the services provided to you could be improved;
- Conduct appropriate checks for credit-worthiness and for fraud;
- Research and develop our services; and
- Gain an understanding of your information and communication needs in order for us to provide you with a better service.

Also, your personal information is collected so that we can promote and market services to you (including by way of direct mail, telemarketing and email). This is to keep you informed of products, services and special offers and may continue after you cease acquiring services from us. If you do not wish us to contact you to promote and market products, services and special offers to you, please call Divine Telecom on 03 8725 2050.

## **When we disclose your personal information**

Divine Telecom may disclose your personal information to organisations outside of Divine Telecom. Divine Telecom may Disclose Personal Information to related or unrelated third parties if consent has been obtained from the individual. This will include obtaining the individual's consent for Disclosures made under the credit reporting requirements of the Privacy Act 1988. Your personal information is disclosed to these organisations only in relation to us providing our services to you. These organisations carry out our:

- Customer enquiries;
- Mailing operations;
- Billing and debt-recovery functions;
- Information technology services;
- Installation, maintenance and repair services;
- Marketing and telemarketing
- Market research; and
- Website usage analysis.

We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information. Divine Telecom will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with the Use and Disclosure requirements of the Privacy Act 1988 and ensure that these organisations are bound by confidentiality and privacy obligations.

In addition, Divine Telecom may disclose your Personal Information to:

- Your authorised representatives or your legal advisers;
- Credit-reporting and fraud-checking agencies;
- Credit providers;
- Our related companies;
- Our professional advisers, including our accountants, auditors and lawyers;
- Other telecommunication and information service providers (for example, if you obtain services from other providers, we may need to disclose your personal information for billing purposes);
- Government and regulatory authorities and other organisations, as required or authorised by law; and
- Organisations who manage our business and corporate strategies, including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our corporate risk and funding functions (e.g. securitisation).

If a Disclosure is not for a Primary Purpose; is not for a related Secondary Purpose; or upfront consent has not been obtained, Divine Telecom will not Disclose Personal Information otherwise than in accordance with the exceptions set out above.

## **How Divine Telecom handles your personal information internally**

Divine Telecom requires employees and contractors to perform their duties in a manner that is consistent with Divine Telecom's legal responsibilities in relation to privacy. Divine Telecom will take all reasonable steps to ensure that paper and electronic records containing Personal Information are stored in facilities that are only accessible by people within Divine Telecom who have a genuine "need to know" as well as "right to know" basis. Divine Telecom will review, on a regular and ongoing basis, its information and security practices to ascertain how ongoing responsibilities can be achieved and maintained.

How Divine Telecom transfers personal information overseas

If Personal Information must be sent by Divine Telecom overseas for sound business reasons, Divine Telecom ensures the overseas organisation sign a NDA (Non-Disclosure Agreement) before receiving the information and to provide a binding undertaking that it will handle that information in accordance with the Australian Privacy Principles, preferably as part of the services contract.

## **You can access your personal information**

Divine Telecom will allow its records containing Personal Information to be accessed by the individual concerned in accordance with the Privacy Act 1988. Divine Telecom will correct its records containing Personal Information as soon as practically possible, at the request of the individual concerned in accordance with the Privacy Act 1988.

Individuals wishing to lodge a request to access and/or correct their Personal Information should do so by contacting Divine Telecom in writing at the contact details listed below. Divine Telecom reserves the right to charge a fee for searching for and providing access to your information.

## **How to contact us**

If you have any questions in relation to privacy, please contact us on our Privacy Liaison as follows:

Phone: 03 8725 2080

Email: support@divinetel.com.au

Address: Ground Floor, 23 Milton Parade, Malvern VIC 3144

Please note that any calls may be made between 9.00am to 5.00pm, Monday to Friday. If you make a complaint about privacy, we will acknowledge receipt of your complaint, and try to investigate and respond to you within 30 days. If you are unhappy with the outcome, you may lodge a complaint with the Telecommunications Industry Ombudsman or the Office of the Australian Information Commissioner.

## **Changes to this document**

Similar to our other policies we regularly review and edit this document so as to ensure its effectiveness and accurateness. We do so at our discretion and may do so without notice. The latest version will be available on our website and when we do make changes to it the changes will be posted on our website.