

## *TransACT Communications*

### **Privacy statement**

#### **Quality**

TransACT Capital Communications Pty Ltd ("TransACT") is committed to the protection of your personal information, which is why we have developed detailed policies and procedures on how we manage this information.

#### **Obligations**

We hold a telecommunications carrier licence granted under the *Telecommunications Act 1997* ("the *Telecommunications Act*"). With this, we are subject to a number of statutory obligations that regulate the collection, use and disclosure of customer information. As a private organisation with a turnover of more than \$3 million, we are also subject to the *National Privacy Principles* (NPPs) as specified under the *Privacy Act 1988* ("the *Privacy Act*").

#### **Types of information collected**

The majority of personal information TransACT holds relates to its customers. This usually includes your name, address, phone number, email address, date of birth and drivers licence number.

#### **Purpose of collecting personal information**

TransACT collects personal information for the purpose of providing services to its customers and communicating effectively in delivering that service.

If customers do not wish to disclose certain personal information they are free to do so. However, failure to disclose personal information may, in some circumstances, mean that TransACT is not able to provide the customer with the services they require.

#### **How TransACT collects personal information**

TransACT collects personal information directly from its customers. Customers may voluntarily supply information by phone, in person, on TransACT's website or in application forms.

TransACT also collects personal information from publicly available sources and from our own records of how customers use TransACT services.

#### **How TransACT uses personal information**

TransACT may use its customer's personal information to:

- confirm a customer's identity and respond to enquiries or complaints
- assist a customer to subscribe to TransACT's services
- provide, administer and manage services requested by a customer

- inform customers about services TransACT provides
- conduct credit and fraud checks
- research and develop TransACT's services
- maintain and develop internal systems and infrastructure.

As part of providing services to customers TransACT may use personal information to promote and market its services by way of direct mail, email and telemarketing.

Customers may opt-out of receiving promotional and marketing material by contacting TransACT's Customer Care team by phone on 13 30 61 or by email at [contactcentre@transact.com.au](mailto:contactcentre@transact.com.au)

### **External parties**

TransACT contracts out its residential sales to an external sales company and so personal information may be collected by a third party. TransACT also discloses its customer's personal information to third party content providers for the purpose of providing services. Personal information may also be disclosed to third party corporate service providers, such as printing houses credit agencies and billing service providers. You are able to obtain access to your personal information held by these entities by contacting them directly.

TransACT relies on third-party suppliers for product storage and to conduct activities such as mail-outs and market research. TransACT may disclose customer information to these third parties. The handling of information is covered by confidentiality agreements and TransACT ensures that these third parties understand their obligations under the *National Privacy Principles*.

TransACT may also provide personal information to mercantile agents for debt recovery purposes.

### **Security**

TransACT is required by law to protect the confidentiality of information that relates to individual's affairs or personal particulars. We will take reasonable steps to ensure that the personal information TransACT holds is protected from misuse, loss, unauthorised access or disclosure. Generally, we will not disclose personal information without consent, including consent given under the Customer Terms and Conditions. In the absence of consent, however, it should be noted that there are certain limited circumstances in which TransACT is authorised to disclose personal information, including as a result of exemptions and requirements specified by the *Telecommunications Act*. For example, employees of TransACT may disclose or use personal information of another person that has come to their knowledge as a result of their employment, if such use or disclosure is part of their duties at TransACT. Disclosure is also permitted to telecommunications authorities, such as the ACA, TIO or ACCC and to aid law enforcement. TransACT will also not disclose information to third party organisations without ensuring such third parties are subject to contractual obligations on the way they deal with such information.

TransACT also ensures that information which is no longer needed will be destroyed or permanently de-identified.

## **Location**

The majority of the personal information that TransACT holds is kept at our Canberra office under secure conditions.

## **Sensitive information**

TransACT will not collect sensitive information from you unless we gain your consent.

## **Identifiers and transborder transfer**

TransACT will not adopt as its own any identifiers assigned to you by any government agency. It will not use such identifiers unless authorised under the *Privacy Act* or other legislation. TransACT will also not send information overseas without ensuring such transfers are in accordance with the *Privacy Act*.

## **Anonymity**

While TransACT attempts to allow all individuals to deal with us anonymously, at times it will be impractical or unlawful for TransACT to give you this option.

## **Access**

If you wish to gain access to the personal information TransACT holds on you, please contact our Customer Care team on 13 30 61 or email us at [contactcentre@transact.com.au](mailto:contactcentre@transact.com.au). TransACT will provide copies of such personal information within 30 days of receipt of a request. In order to gain such access, identification must be provided in satisfaction of TransACT's security procedures. An administration fee of \$2 per A4 page requested will be charged for the provision of personal information.

## **Further information**

If you wish to gain more information on how TransACT manages the personal information it holds, or you wish to make a complaint regarding a breach of privacy by TransACT, please contact our Customer Care team on 13 30 61 or email us at [contactcentre@transact.com.au](mailto:contactcentre@transact.com.au).

TransACT takes its privacy obligations very seriously and has detailed privacy policies and procedures in place, which can be accessed by members of the public. Requests for information are first handled by our Customer Care team, before being referred to our Privacy Officer.