

Flipped Privacy Policy

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Privacy Policy

Introduction

This is the Privacy Policy of Flipped Energy Australia Pty Limited (ABN 73 653 445 740) and its subsidiaries. It describes how we manage your personal information and comply with our privacy obligations in the Privacy Act 1988 (Cth) (the "Privacy Act").

We may modify this Privacy Policy from time to time. If we do, we will post the updated Privacy Policy on our website.

This Privacy Policy should be read in conjunction with:

- any privacy or collection statement that we provide to you; and

Types of personal information we collect

If you are a customer or potential customer

If you are a customer or potential customer, we collect information about you to provide you with services and otherwise facilitate your dealings with us. This information may include:

- your contact details;
- identification information such as your date of birth, driver's licence, passport or Medicare number;
- payment information such as bank account details;
- information about your financial / personal circumstances (such as concession details and employment, income and credit information);
- details relating to the supply of energy to you (including meter details and data related to your energy consumption, connection and interruptions); and information you provide to us when participating in customer surveys or competitions.

Sometimes, we may collect health information that you provide to us (for example, if there is a need to administer life support at your premises, or you make a concession or hardship request).

We may also collect personal information about the people you live with (e.g. your spouse, partner or co-tenants). We rely on you to inform these individuals that their personal information is being provided to us and that they may contact us for further information.

We sometimes obtain credit reports about new or returning customers.

If you do business or have other dealings with us

If you, or your employer, does business with us or has other dealings with us, we collect information about you to facilitate those arrangements. This information may include your name, position, contact details, and any other information you provide. For security reasons, we may collect your contact details and take your photograph when you sign in to our office or site locations.

If you are an employee or applicant

If you are an employee or a job applicant, we collect information about you to administer your employment or process your application. This may include qualification and identification information, residency / visa status information, medical records and health information,

psychological testing results and results from records checks. If you are offered a position, we may also collect details such as your tax file number, bank account number, superannuation and union membership details.

How we collect personal information

Directly from you

In many instances, we collect personal information directly from you. For example, if you are a customer, we may collect your information from an application form you have completed, or when you contact us by phone, email, through our website or via social media sites. Your calls to our telephone customer contact centre may be recorded and monitored for training, verification and compliance purposes.

Some other examples are below:

- If you use our registration system to visit our offices and site locations.
- If you work with us or apply for a job with us.
- If you engage with us regarding our activities as a member of the public.

From our partners

If you are a customer or potential customer, we may collect information about you through our service providers who provide customer acquisition and onboarding services to us. These service providers may be companies who provide energy comparison or moving assistance services. They collect your information from you and then provide it to us for the purposes of assisting you become our customer.

From other third parties

We may also collection information about you from other third parties such as electricity and gas distributors, credit reporting bodies, market data research firms, contractors engaged to monitor metering and provide payment/billing services, government agencies and regulators and other third party service providers.

In addition, when you apply for a job or position with us, we may collect information about you from any recruitment consultant, your previous employers, referees, CV checking agencies or others who may be able to provide information to assist us with our decision.

Through other means

We may collect personal information about you through other means, for example:

- through our advanced metering infrastructure (e.g. through our monitoring of smart meter data);

- from your representatives (e.g. spouse, partner or co-tenant); and
- from publicly available sources.

Why we collect, use and disclose personal information

We collect, hold, use and share your personal information for our business operations and activities, for example:

- to facilitate the provision of energy and related services to your supply address;
- to communicate with you (by sending service, support and administrative messages, reminders and notices) and to keep you updated regarding our activities;
- to assess concession entitlements and hardship requests;
- to facilitate payments (issuing bills, setting up direct debits, processing payments and refunds, recovering debts and otherwise managing our financial activities);
- to respond to your enquiries and resolve complaints and disputes;
- to send you marketing and promotional messages and other information that may be of interest to you;
- to administer our Rewards Program, customer surveys, contests and other promotional activities or events;
- to improve and optimise our services and our customers' experience (for example, by performing analytics and conducting research for advertising and marketing); and
- to comply with our regulatory obligations, report to regulators and authorities and assess our legal compliance (including through external audits).

Who we disclose personal information to

We may disclose your personal information for the purposes described in this Policy to:

- our employees and related bodies corporate;
- the operator of the network through which energy is supplied to you, and the operators of other electrical networks;
- our service providers who assist us by, for example, providing IT services, back-office management services or customer acquisition and onboarding services (e.g. energy comparison or moving assistance providers);
- CV checking agencies (if you have applied for a position with us);
- third persons you have authorised us to provide your information to (such as additional account holders or your authorised representatives);
- our Rewards Program partner, Neat Tickets Pty Ltd, trading as Neat Ideas (if you participate in our Rewards Program);
- financial institutions and payment system operators (including merchants);
- our insurance brokers, providers and consultants;
- our professional advisers, dealers and agents (including independent auditors, legal and tax advisers);
- debt collection agencies and others that assist us with debt recovery;
- the sponsors or promoters of any competitions that we conduct;
- credit reporting bodies;

- state and federal government agencies (e.g. Centrelink to administer concession entitlements);
- regulatory bodies and law enforcement agencies (e.g. the Energy Ombudsman and the Australian Energy Market Operator); and
- other persons as required or permitted by law.
- We take reasonable measures to ensure that the parties we share your information with are bound by confidentiality and privacy obligations.

Overseas disclosure

Flipped Energy may disclose your information to entities outside of Australia. We use service providers located outside of Australia to perform functions on our behalf. The entities we may share your information with may be located in, or have personnel that may access your information from, the following jurisdictions: the United Kingdom, the United States of America, Canada, New Zealand, Indonesia, Malaysia, Singapore, India, Pakistan, the Philippines, South Africa and Belarus. We only disclose your information to entities outside of Australia for our business functions or for the purposes of providing services to you. Where we do so, we ensure that the disclosure of and access to that information is secure and appropriate controls are in place, and we take reasonable steps to ensure that any overseas recipients of your personal information handle it in a manner consistent with the Privacy Act.

Direct marketing

We and/or our business partners may send you direct marketing communications and information about products and services that we or third parties offer, including competitions that we think you might be interested in. This may occur even after you cease being our customer and may take the form of emails, SMS, mail or other forms of communication. You may opt-out of receiving these marketing communications by contacting us using the details set out below:

0401 057 949

info@flipped.energy

Even if you opt-out of receiving marketing communications, we may still contact you to send important administrative and safety messages.

Using our website and cookies

We may collect personal information about you when you use and access our website (for example, when you submit an enquiry or online form, access your account online, sign up to our newsletter, or enter a competition on our website).

Our website includes pages that use cookies which are small amounts of data sent by our website and other third parties and stored on your computer's hard drive. This allows our servers to recognise your computer when you visit our website in the future. Although cookies are used to collect data about your browser type, the operating system you are using, the web page you visited,

your internet service provider and your State location, Flipped Energy does not use this data to identify you personally.

Our website also uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics also uses cookies. Although these cookies do not identify you personally, they allow information about your use of our website (including your IP address and device ID) to be transmitted to Google. For more information, please see Google's site "How Google uses data when you use our partners' sites or apps", located at www.google.com/policies/privacy/partners/. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. If you refuse the use of cookies in this way you may not be able to access the full functionality of our website. Please refer to your internet browser's instructions or help screens to learn more about these functions.

To assess the effectiveness of our website design and layout, as well as monitor traffic to the website, we may contract with third parties to collect statistical data. However no personal information is collected during this process.

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from this Policy, so we encourage individuals to read them before using those websites.

Security

We generally hold personal information in our electronic databases but also store personal information in hard copy form and in various third party databases and platforms.

We are committed to the security of your personal information and take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to protect your personal information. Examples of the measures we have implemented to protect your personal information include:

- implementing internal processes and policies in relation to the collection, use and secure storage of personal information and educating our personnel in relation to these obligations;
- storing personal information in secure, encrypted data centres;
- using secure networks or encryption when transmitting electronic customer data and personal information;

- using ID cards, cameras and sign in procedures to prevent unauthorised access to our offices and buildings;
- requiring the third parties we engage to take adequate security measures and handle your personal information in a manner consistent with the Privacy Act;
- complying with payment card industry security standards with respect to the storage and transmission of payment card details; and
- destroying and de-identifying information when the data is no longer required for our business or required to comply with the law.

Requests to access personal information

You can request access to the personal information that we hold about you at any time by contacting us using the details at the end of this Policy.

We will respond within a reasonable period of receiving your request. Where possible, we will provide you with a copy or details of your personal information in the manner requested.

Sometimes we may be unable to provide you with access to all of your personal information. Where this is the case, we will tell you why.

Requests to correct personal information

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete, up to date and relevant. If you believe the personal information that we hold about you is inaccurate, incomplete or outdated, please contact us using the details at the end of this Policy.

We will respond within a reasonable period of receiving your request.

If we refuse your correction request, we will tell you why.

Privacy complaints

If you believe that we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, we encourage you to contact us using the details at the end of this Policy.

Please include your name, email address and/or telephone number and clearly describe your complaint. We will respond within a reasonable period of receiving your complaint.

If you are dissatisfied with the handling of your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). For further information regarding how to make a complaint to the OAIC, you can visit [oaic.gov.au/privacy/making-a-privacy-complaint](https://www.oaic.gov.au/privacy/making-a-privacy-complaint).

How to contact us

Please send us an email for any queries at:

info@flipped.energy

Alternatively, you can contact us by phone on:

0401 057 949