



Privacy Policy 2020

Noosa Telecom, P.O. Box 562, Noosa Heads, QLD, 4567

Contact: (07) 5412 7321

Website: www.noosatelecom.com.au

Email: admin@noosatelecom.com.au



Table of Contents

Privacy Policy Foundation	1
1. Collection.....	2
2. Use	4
3. Disclosure.....	5
4. Information Quality	7
5. Information Security.....	8
6. Access and Correction.....	9
7. Transparency.....	10
8. Anonymous Transactions	11
9. Transferring Private Information Overseas	12
10. Glossary	13
11. Contacting Noosa Telecom	14



Privacy Policy Foundation

This policy has been drafted in accordance with the *Telecommunications Act 1997* (Cth) and the *Privacy Act 1988* (Cth), and Noosa Telecom's obligations thereunder.

This Policy sets out the approach that Noosa Telecom will take in relation to the treatment of private information, including how Noosa Telecom collects, uses, discloses and keeps secure, said private information. This Policy also covers how Noosa Telecom makes the private information it holds available to an organisation or individual customer for access and/or amendment.

This Policy is a public document pursuant to the Office of the Australian Information Commissioner's Australian Privacy Principles as contained in the *Privacy Act 1988* (Cth).



1. Collection

1.1 Noosa Telecom will only collect private information where the information is necessary for Noosa Telecom to perform one or more of its functions or activities. In this context, “*collect*” means gather, acquire or obtain by any means, information in circumstances where the individual is identifiable or identified.

1.2 Noosa Telecom collects private information primarily to supply customers with the services ordered from it. Noosa Telecom also collects and uses private information for secondary purposes including:

- i. invoicing;
- ii. account management;
- iii. business planning; and
- iv. services development.

1.3 Noosa Telecom will notify customers of the matters listed below before collecting any private information:

- i. the main reason for the collection (the primary purpose);
- ii. other possible use or disclosure of the information (secondary purpose);
- iii. our identity and how customers can contact us;
- iv. customer access to their information held by Noosa Telecom;
- v. that customers can contact Noosa Telecom to access, correct or inquire about their private information held by Noosa Telecom;
- vi. the organisations to whom Noosa Telecom may disclose the private information;
- vii. any law that requires the private information to be collected; and
- viii. any consequences for the customer if the required private information is not provided to Noosa Telecom.



1.4 Where it is not practicable for Noosa Telecom to notify customers before the collection of private information, Noosa Telecom will ensure that customers are notified of the collection as soon as possible after the collection.

1.5 Noosa Telecom will not collect sensitive information from customers except with consent and only where it is necessary for Noosa Telecom to collect such information in order to provide a service.

1.6 Noosa Telecom will not covertly or dishonestly collect private.



2. Use

2.1 Noosa Telecom will obtain a customer's consent for use of non-sensitive private information for secondary purposes at the time of collection, unless the use is a related secondary purpose that would be within the customer's reasonable expectations.

2.2 Noosa Telecom uses private information primarily for the purposes listed in 1.2, above.

2.3 If Noosa Telecom relies on the Direct Marketing Exception to direct market to customers it will ensure that:

- i. customers are clearly notified of their right to opt out from further direct marketing;
- ii. there is only one use of the information before the opt out right is given;
- iii. the customer is given an opt out in all further instances of direct marketing if they have not previously chosen to opt out; and
- iv. if the customer opts out of all direct marketing, the opt out will be respected by Noosa Telecom.

2.4 Noosa Telecom will not use sensitive information for direct marketing.

2.5 Noosa Telecom may use private information to avoid an imminent threat to a person's life or to public safety.

- i. It may also use private information for reasons related to law enforcement or internal investigations into unlawful activities.

2.6 Noosa Telecom will not use private information without taking reasonable steps to ensure that the information is accurate, complete and up to date.

2.7 Noosa Telecom will not attempt to match anonymous data with an individual.

3. Disclosure

3.1 Noosa Telecom may disclose private information to related or unrelated third parties if consent has been obtained from the customer. This will include obtaining the customer's consent for disclosures made under the credit reporting requirements of the *Privacy Act 1988* (Cth).

3.2 Noosa Telecom may disclose private information internally.

- i. Where information is so disclosed, to such a Related Body Corporate, Noosa Telecom is bound by the original primary purpose for which the information was collected.

3.3 Noosa Telecom may disclose private information to unrelated third parties to enable outsourcing of functions (such as invoicing), where that disclosure or use for a related secondary purpose has been notified to the customer or where such a disclosure is within the customer's reasonable expectations.

- i. Customers will be notified of Noosa Telecom's usual disclosures via the Collection of Information, as outlined in 1.3, above.

3.4 Noosa 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* (Cth).

3.5 Noosa Telecom may disclose private information to law enforcement agencies, government agencies, courts or external advisers where permitted or required by law.

3.6 Noosa Telecom may disclose private information to avoid an imminent threat to a person's life or to public safety.

3.7 Noosa Telecom may disclose private information to third parties involved in the sale or transfer of assets of the business, including unpaid debts.



3.8 If a disclosure is not for a primary purpose; is not for a related secondary purpose; or upfront consent has not been obtained, Noosa Telecom will not disclose private information otherwise than in accordance with the exceptions set out at 3.1 to 3.6, above.

3.9 Noosa Telecom does not sell or share its customer list on a commercial basis with third parties.



4. Information Quality

4.1 Noosa Telecom will review, on a regular and ongoing basis, its collection and storage practices to ascertain how improvements to accuracy can be achieved.

4.2 Noosa Telecom will take steps to destroy or de-identify private information after as short a time as possible and after a maximum of seven years, unless the law requires otherwise.



5. Information Security

5.1 Noosa Telecom requires employees and contractors to perform their duties in a manner that is consistent with Noosa Telecom's legal responsibilities in relation to privacy.

5.2 Noosa Telecom will take all reasonable steps to ensure that paper and electronic records containing private information are stored in facilities that are only accessible by people within Noosa Telecom who have a genuine "need to know" as well as "right to know".

5.3 Noosa Telecom will review, on a regular and ongoing basis, its information security practices so as to ascertain how ongoing responsibilities can be achieved and maintained.



6. Access and Correction

6.1 Noosa Telecom will allow its records containing private information to be accessed by the individual concerned in accordance with the *Privacy Act 1988* (Cth).

6.2 Noosa Telecom will correct its records containing private information as soon as practically possible, at the request of the customer concerned in accordance with the *Privacy Act 1988* (Cth).

6.3 Customers wishing to lodge a request to access and/or correct their private information should do so by contacting Noosa Telecom, per the details included in this document.

6.4 Noosa Telecom will not normally charge a fee for processing an access request unless the request is complex or is resource intensive.

6.5 Where Noosa Telecom offers on-line account management facilities, customers can use this capability to control aspects of their account, including amending or updating certain private information.



7. Transparency

7.1 Noosa Telecom’s representatives will be the point-of-contact for inquiries about privacy issues. Customers wishing to make an inquiry or complaint regarding privacy should do so by contacting Noosa Telecom per the details included in this document.

7.2 Privacy complaints will be managed in accordance with Noosa Telecom’s Complaint Handling Policy, which complies with the Telecommunications Consumer Protections Industry Code (as amended).

7.3 The Noosa Telecom website will contain a prominently displayed privacy statement and will include a copy of this Privacy Policy.



8. Anonymous Transactions

8.1 Noosa Telecom will not make it mandatory for visitors to its website to provide private information unless such private information is required to answer an inquiry or provide a service.

- ii. Noosa Telecom may, however, request visitors to provide private information voluntarily to Noosa Telecom as part of a competition or questionnaire.

8.2 Noosa Telecom will allow its customers to transact with it anonymously wherever that is reasonable and practicable.



9. Transferring Private Information Overseas

9.1 Noosa Telecom will take reasonable steps to limit the amount of private information it sends to unrelated organisations overseas.

9.2 If private information must be sent by Noosa Telecom overseas for sound business reasons, Noosa Telecom will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with the National Privacy Principles as contained in the *Privacy Act 1988* (Cth) and as an immutable element of the services contract.

10. Glossary

Collection Information: the information outlined in 1.3 notified to customers prior to, or as soon as practical after, the collection of their private information.

Direct Marketing: the marketing of goods or services through means of communication including written, verbal or electronic means.

Disclosure: the release of information outside Noosa Telecom, including under a contract to carry out an outsourced function.

Noosa Telecom: includes all potential future companies in the Noosa Telecom Group

Private Information: information or an opinion (including information or an opinion forming part of a database), whether true or not and whether recorded in a material form or not, about a customer whose identity is apparent, or can reasonably be ascertained from the information or opinion.

Primary Purpose: the dominant or fundamental reason for information being collected in a particular transaction.

Reasonable Expectation: an expectation that a customer's private information may be used or disclosed for a particular purpose during the regular course of business and with respect to the services invoiced to the customer.

Sensitive Information: information or an opinion about a customer's:

- a) racial or ethnic origin; or
- b) political opinions; or
- c) membership of a political association; or
- d) religious beliefs or affiliations; or
- e) philosophical beliefs; or
- f) membership of a professional or trade association; or
- g) membership of a trade union; or
- h) sexual preferences or practices; or
- i) criminal record.

Use: the handling of private information within Noosa Telecom.



11. Contacting Noosa Telecom

If you require further information regarding Noosa Telecom's Privacy Policy, you can contact us via:

Telephone

(07) 5412 7321

Web

www.noosatelecom.com.au

E-mail

admin@NoosaTelecom.com.au

Mail

P.O. Box 562, Noosa Heads, QLD, 4567

