



# Sorted Services Privacy Policy (including Credit Reporting Policy).

The following document is the Privacy Policy and Credit Reporting Policy for Sorted Services\*. References to "us", "we" and "our" in this Policy are references to Sorted Services.

Sorted Services is committed to the protection of your personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (Privacy Act) and the Privacy (Credit Reporting) Code 2014 (CR Code), which governs credit reporting in Australia. This Policy sets out how we collect, use, manage and store personal information, credit information and credit eligibility information.

## 1. What personal information we collect

"Personal information" means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Personal information we may collect or hold can include:

- (a) your name, date of birth and contact details including address, email address and phone number (including mobile telephone number);
- (b) your occupation;
- (c) your driver's licence number, passport number, Medicare number;
- (d) your username and password;
- (e) your financial information (including credit card, debit card or bank account numbers);
- (f) your service consumption history information and metering data;
- (g) your historical billing information;
- (h) your household details (including household size);
- (i) employment and rental references and details of rental payments;
- (j) limited health information about you such as your Centrelink customer reference number (to provide you with a pensioner discount); and

- (k) any other personal information you submit to us, as well as any other personal information that we consider is reasonably necessary to perform our functions and activities.
- (l) We may also collect non-personal information about you, including but not limited to, data relating to your activities when you using our software, system or application, including via cookies.

## 2. How we collect personal information

We collect personal information in a number of ways, including:

- (a) from you directly, when you provide information on a hard copy form, by email, by phone, in person, by live chat, or when you submit your personal details through our websites, online forms or app;
- (b) from third parties such as credit reporting agencies, our service providers, third parties to which we provide services, your previous service providers, distribution companies (e.g. to collect your metering data) or builders and real estate agents or people you authorise us to collect information from (referees or employers);
- (c) through marketing and business development events; and
- (d) from publicly available sources of information.

\*In this Policy, Sorted Services means:

- Sorted Lab Pty Ltd (ABN 68 616 153 738) ("Sorted Lab"); and
- Energy Locals Pty Ltd ABN 23 606 408 879 trading as Sorted Services Electricity ("Sorted Services Electricity"), to the extent that Sorted Lab as agent for Sorted Services Electricity has agreed with any customer to supply electricity services to that customer.

If you choose not to provide certain information about you, we may not be able to provide you with the products or services you require.

We do not generally collect sensitive information about individuals. Where we collect, use and disclose sensitive information about you, we will only do so where it is reasonably necessary to conduct our business and either we have obtained your consent or it is permitted by law. "Sensitive information" is information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, genetics, biometrics or health.

We collect some personal information under laws. For example, we may be required to collect information about customers on life support as these customers have a special need for continuity in their electricity supply.

### 3. Use and disclosure of personal information

We collect, use and disclose personal information for the primary purpose of conducting our business, which includes:

- (a) verifying your identity;
- (b) providing the services you require;
- (c) managing and administering those services, including charging, billing, processing payments and collecting debts;
- (d) monitoring network use, quality and performance;
- (e) operating, maintaining, developing, testing and upgrading our systems;
- (f) contacting you in any way (including mail, email, phone, visit, text or multimedia messages) about products and services offered by us;
- (g) informing you of ways the services provided to you could be improved;
- (h) fraud checking;
- (i) researching and developing our services;
- (j) responding to enquiries or requests;
- (k) direct marketing to you (see 10 below); and
- (l) to real estate agents or agencies and landlords for the purposes of providing our services to you and in turn these parties may disclose your personal information to other third parties (including service providers or property owners); and
- (m) as required by or in accordance with any industry code or industry standard registered under any law

including the Telecommunications Act 1997 (Cth), National Electricity Law, National Energy Retail Law or National Energy Retail Rules.

In conducting our operations, we may share some of your personal information with third parties such as:

- i. credit providers and credit reporting bodies (for credit related purposes such as credit-worthiness checking, credit rating, credit provision and financing);
- ii. real estate agents, agencies and landlords;
- iii. government and regulatory authorities and other organisations, as required or authorised by law;
- iv. our outsourced service providers and contractors;
- v. third parties who engage our services;
- vi. our principal or our agent (e.g. where Sorted Lab Pty Ltd sells electricity as agent for Sorted Services Electricity);
- vii. other retailers (e.g. to migrate your energy or telecommunication services) and distributors (e.g. your electricity distributor); and
- viii. the Australian Energy Market Operator which manages energy supply, demand and capacity in accordance with applicable laws.

We may use and disclose your personal information for secondary purposes as permitted by law.

### 4. What credit information we collect

"Credit information" refers to certain information relating to an individual's credit-related dealings with us, and "credit eligibility information" refers to certain information related to an individual's credit-related dealings with other credit providers (as provided by credit reporting bodies). We will only collect your credit information where you are making an application for credit facilities with us (for example post-paid services).

Credit information about you which we may collect or hold may include:

- (a) the above personal information;
- (b) information about your employer, position held and income;
- (c) your consumer credit liability information;
- (d) your repayment history information;
- (e) information request statements from credit providers, mortgage insurers or trade insurers;
- (f) default information, payment information, new credit arrangement information, court proceedings information and personal insolvency information about you; and

- (g) other publicly available information related to your credit-worthiness.

## 5. How we collect credit information

We may collect credit information from you, where lawfully permitted to do so, in various ways, including from:

- (a) credit application forms submitted to us;
- (b) credit reporting bodies; and
- (c) other credit providers.

## 6. Use and disclosure of credit information

We collect, use and disclose credit information for the primary purpose of conducting our business, which includes:

- (a) assessing applications for credit arrangements including checking your credit-worthiness;
- (b) establishing and maintaining customer accounts and managing such relationships;
- (c) dealing with the management, recovery, securitisation and assignment of debts;
- (d) assisting you to avoid defaulting on your credit obligations;
- (e) providing information to debt collection agencies for the purpose of recovering debts;
- (f) notifying other credit providers of a default by you;
- (g) assessing credit defaults reported by credit reporting bodies or debt collection agencies; and
- (h) for internal management purposes.

To enable us to assess an application by you for a credit arrangement we may:

- i. obtain from a credit reporting body a credit report containing credit information and personal information about you; and
- ii. obtain a report from a credit reporting body and other information in relation to the commercial credit activities of all individuals listed in the application for credit.

We may, where you have given consent, give to, and obtain from, any credit provider named in your application for a credit arrangement and any credit provider that may be named in a credit report issued by a credit reporting body, information about your credit arrangements.

We may also disclose your credit information and personal information to credit reporting bodies in relation to credit-related dealings, for example where you have failed to meet payment obligations or commit a serious credit

infringement. We may disclose your credit information to the following credit reporting bodies:

### Veda Advantage

Veda - Customer Resolutions  
PO Box 964, NORTH SYDNEY NSW 2059  
1300 762 207  
corrections@veda.com.au  
www.mycreditfile.com.au

### Dun and Bradstreet

Attn: Public Access Centre

PO Box 7405, ST KILDA RD VIC 3004  
1300 734 806  
pac.austral@dnb.com.au  
www.dnb.com.au

### Experian Australia

Attn: Credit Report  
PO Box 1969, NORTH SYDNEY NSW 2060  
1300 783 684  
creditreport@au.experian.com  
www.experian.com.au

The above credit reporting bodies are required to have a policy about how they manage credit-related personal information. This policy can be accessed on each credit reporting body's website or by contacting them directly.

You have the right to request that the above credit reporting bodies do not use your credit reporting information for the purposes of pre-screening of direct marketing. You also have the right to request that the above credit reporting bodies do not use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud (i.e. if you suspect someone may use your identity to apply for credit). You must contact the above credit reporting bodies directly if this is the case.

## 7. Overseas disclosure

From time to time, we may disclose your personal information to overseas recipients, such as third party contractors, if we consider it necessary or desirable in connection with operating our business, for example in the USA, India, New Zealand or the Philippines.

## 8. Storage and security of personal information

Where we hold your personal information or credit information, we will take reasonable steps to ensure that the information is secure and may only be accessed by authorised persons.

Although we take all reasonable measures, we cannot guarantee that there will be no third-party circumvention

of security measures on our electronic databases or at any of our premises.

Please note that third party recipients of personal information may have their own privacy policies and we are not responsible for their actions, including their handling of personal information.

If any personal information that we hold is no longer required for the purpose for which it was collected and no applicable law requires us to retain that information, we will take reasonable steps to de-identify or destroy the information.

#### 9. Access to and correction of personal information

We will use reasonable steps to ensure the personal information we hold is complete, up-to-date and accurate, so far as it is practicable for us to do so.

You may request access to the personal information we hold about you by contacting us using the details set out below. Additionally, you may contact us to obtain confirmation of whether or not we hold credit eligibility information about you, and to correct the personal information we hold about you in certain circumstances.

We may impose a reasonable charge for providing you with access to your personal information.

To protect your privacy and security, we will take reasonable steps to verify your identity before allowing you to access or make corrections to the personal information we hold about you.

#### 10. Direct marketing

From time to time, we may use your personal information for direct marketing purposes (for an indefinite period, including after you cease using our services). This includes sending you updates about new products and services we are offering. When we contact you, it may be by mail, telephone, email, SMS or through any other means. When we use or disclose your personal information for the purpose of direct marketing, we will:

- (a) allow you to 'opt out' or in other words, allow you to request not to receive further direct marketing communications of the relevant type; and
- (b) comply with a request by you to 'opt-out' of receiving further communications of that type within a reasonable timeframe.

You may ask to be removed from our marketing lists for any or all types of direct marketing at any time by contacting us using the details set out below.

#### 11. Cookies

On our website, "cookies" are generally used to record how people use our site. A cookie is small bits of information

that are stored on your computer's hard drive which records how you have used a website. It helps us improve and upgrade our website based on usage of the site. It also means that when you go back to our website, the site can give you customised options based on the information the cookie has stored about your last visit. You can generally modify the settings of your browser to prevent it from accepting cookies. While cookies do not personally identify you, they do identify your browser.

If you do not want us to use cookies in your browser, you can set your browser to disallow cookies or to let you know when a website attempts to put a cookie on your computer. However, you may not be able to use some aspects of our website without cookies.

#### 12. Questions and complaints

If you have any questions in relation to how we handle personal information, or wish to lodge a complaint about our management of personal information or a request for access to or correction of your personal information, please contact us using the contact details below:

- o via the Sorted App or our website at [www.sortedservices.com/contact-us/](http://www.sortedservices.com/contact-us/)
- o for general enquiries, sending us an email to [contact@sortedservices.com](mailto:contact@sortedservices.com)
- o for complaints, sending us an email to [complaints@sortedservices.com](mailto:complaints@sortedservices.com)
- o sending us a letter at Customer Relations and Complaints, Sorted Services, PO Box 4003, Richmond East 3121
- o calling 1300 484 141 at any time and leaving a message

Our Privacy Officer will co-ordinate the investigation of any complaint and any potential resolution of a complaint. We will aim to resolve all complaints as soon as practicable.

#### 13. Changes to this Policy

We may change this Policy at any time. If we make changes to this Policy we will notify you by publishing the revised version of this Policy on [www.sortedservices.com](http://www.sortedservices.com). The revised version of this Policy will be effective at the time we post it.

Last updated: July 2019