

Privacy Policy

This Privacy Policy applies to SGSP (Australia) Assets Pty Ltd (ABN 60 126 327 624) and its wholly owned subsidiaries other than the Ovida business or the Zinfra business which have separate privacy policies which are available on their websites (**Jemena**).

We are subject to the operation of the Privacy Act 1988 (Cth) (**Privacy Act**).

The purpose of this policy is to provide a clearly expressed and up to date policy about the management of personal information held by Jemena. In particular, this policy describes what kind of personal information Jemena collects, how it is held, the purposes for which it is collected and held, how an individual may access and correct that information and how an individual may complain about a breach of the Australian Privacy Principles in relation to information which it holds.

Terminology

In this policy the expressions "we", "us" and "our" are a reference to Jemena.

The expressions "you" and "your" refer to each and every individual whose personal information we may handle from time to time.

The expression "personal information" is used in this policy to refer to information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Any reference to us assuming an obligation under the Privacy Act or other privacy legislation is also a reference to us procuring our contractors to undertake a reciprocal obligation to the extent relevant.

Consent

By providing your personal information or electing to utilise our services, you will be deemed to consent to us using your personal information in a manner consistent with this privacy policy.

How we collect personal information

Our preference is to collect personal information about an individual direct from that individual unless it is unreasonable or impracticable for us to do so. We usually collect information directly from individuals when a customer registers to use our online portal.

However, the nature of our business is such that it is often impracticable for us to collect personal information directly from individuals and we generally collect personal information about customers indirectly from energy retailers who sell energy services directly to those customers.

Why we collect personal information

We collect certain personal information from customers to allow us to deliver one or more of our functions and services to those customers. The collection of this personal information also allows us to contact our customers in relation to their gas or electricity supply when necessary. If this personal information is not collected, we will be unable to provide services to customers. Our services and functions range from the supply, maintenance, construction and transportation of electricity and gas.

Other circumstances in which we may collect personal information about an individual are in the course of business dealings with them and during employee recruitment processes.

Type of personal information we collect

The personal information we collect will vary depending on the circumstances but, in all cases, we will only collect information about an individual that is relevant to our business relationship with them. For example, we may collect an individual's name, contact details, information about our interaction with them and other relevant details that will assist in our business dealings and associated business development.

If you or your energy retailer, registered electrical or gas contractor or other relevant party requests a service from us (e.g. to obtain a connection or supply of electricity or gas), we collect some or all of the following personal information:

- name;
- postal address;
- telephone number;
- credit reference information;

- address of premises at which our service is provided; and
- type of service requested.

In exceptional circumstances, we may also collect and maintain sensitive personal information where there are special health needs at the premises. This information regarding special electricity supply arrangements (such as dependence on a dialysis machine) will only be collected from you, or from your energy retailer, as per your request for special supply arrangements. Please note this information must be verified by and confirmed to us by your energy retailer.

At times, we may also collect records of a customer's electricity or gas consumption, and if applicable, a customer's load profile.

Customer telephone calls may be recorded for quality, security and compliance purposes. If you do not wish your call to be recorded, please inform the customer service advisor.

In some cases, we may be required by law to collect certain personal information. If we don't collect your personal information, we may not be able to fulfill your request, process your application or provide our services.

Use and disclosure of personal information

We only use your personal information in connection with the original reasons for collection, or in other ways which we believe you would reasonably expect. In this regard, we will generally use your personal information for one or more of the following purposes, to:

- identify our customers;
- provide and improve services to our customers including by way of data analytics;
- maintain services provided to our customers;
- consider applications for employment; and
- comply with our legal obligations.

Further to the above points, we may need to collect, use or disclose personal information to comply with our legal and regulatory obligations and in providing such products or services as may be offered by Jemena from time to time, including to:

- connect, or maintain supply of gas and/or electricity to you;
- notify you about emergencies, outages, faults or interruptions;

- respond to your enquiry, investigate and resolve a complaint;
- provide billing and account management services associated with our products or services; and
- provide access to any relevant electronic portal or application.

We might also disclose personal information to:

- other entities within the Jemena group of companies in Australia and to related bodies corporate offshore; and
- our maintenance personnel or other service providers or contractors (including outsourced and cloud service providers) who may be unable to avoid accessing personal information in the course of providing technical or other support services to our company.

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date when using or disclosing information, and having regard to the purpose of the use and disclosure.

Direct Marketing

We will not use or disclose personal information for the purposes of direct marketing unless:

- you have consented to receive direct marketing materials; or
- you would reasonably expect us to use your personal details for this purpose.

In every instance, we will ensure that our direct marketing material incorporates an option for you to elect to receive no further communications.

Also note that even if you have requested not to receive further direct marketing communications, we may nevertheless continue to provide you with information about changes to our terms and conditions for the supply of goods or services, questionnaires and other factual information.

Job Applicants

If you apply to work for us as an employee or seek to provide your services as a contractor we may require you to undergo a pre-placement health assessment which will involve the collection of sensitive information, including health information. We may also engage third parties to conduct background checks.

Please note that if you become our employee, in accordance with the Privacy Act, this policy does not apply to our acts and practices directly related to a current or former employment relationship between us and an employee, and any employee record held by us relating to the employee.

Nevertheless, if we transfer employee records to a related body corporate offshore for any reason, we will comply with cross-border restrictions set out in the Privacy Act which applies to the overseas transfer of personal information.

If a person applies for a job with us, we will collect some or all of the following personal information and health information from that person, such as:

- name and contact details;
- employment application;
- curriculum vitae, including employment history; and
- details of any relevant medical conditions.

Overseas Disclosure

Typically, we will store personal information on our information network within Australia.

Personal information may be sent offshore to related bodies corporate, as permitted by the Privacy Act, which are located in Singapore, Hong Kong and China. In addition, it is possible that we, or our contractors, will utilise cloud and other technologies in connection with the storage of personal information, and it is possible that this may result in offshore storage. It is not practicable for us to specify, in advance, which countries the personal information may be stored. All of our contractors, however, are required to comply with the Privacy Act in relation to the use, transfer or storage of personal information overseas.

Data Security

We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure. We do this by having physical and electronic security systems, limiting who can access your personal information and training our staff to keep your information safe and secure. We also have online and network security systems in place for our websites, so that the information you provide us online is protected and secure.

When using our website, you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect such information, we do not warrant the security of any information that you transmit to us over the Internet and you do so at your own risk.

Openness

From time to time, we may change this policy on how we handle personal information or the types of personal information which we hold. Any changes to this policy will be published on our website. You may obtain a copy of our current policy or contact our Privacy Officer on the details below. It is your responsibility to check the website from time to time in order to determine whether there have been any changes.

Access, Correction and Further Information

We will provide you with access to your personal information held by us as permitted under the Privacy Act.

Please contact us via the details below if you:

- wish to have access to the personal information which we hold about you;
- consider that the personal information which we hold about you is not accurate, complete or up to date; or
- require further information on our personal information handling practices.

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in actually providing you with access.

If you consider that the information which we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you may request that we correct that information using the “Application for Correction of Personal Information Form” available on the Jemena website. Upon receipt of such request we will take reasonable steps, consistent with our obligations under the Privacy Act, to correct that information if you so request.

We will respond to all requests for access and/or correction within a reasonable period.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, please

advise us via the contact details below using the “Privacy Complaint Form” available on the Jemena website.

Alternatively, please submit the information requested in this form in some other legible written format (for example, an email, fax or letter) to our Privacy Officer, using the contact details below.

We will respond to your complaint within a reasonable period.

If you are dissatisfied with the way in which we have handled a privacy issue, we suggest you approach an independent advisor or contact the Office of the Australian Information Commissioner for guidance on alternative courses of action which may be available. We will provide our full cooperation in the event that you elect to pursue this course of action.

Contact Details

Privacy Officer Jemena Limited
567 Collins Street,
MELBOURNE VIC 3000

Fax: 03 9173 7516

Phone: 03 9173 7000

Email: privacyenquiries@jemena.com.au

For further privacy information, please refer to the Privacy Commissioner’s website (www.privacy.gov.au).

Links

[Application for Access to Personal Information Form](#)

[Application for Correction of Personal Information Form](#)

[Privacy Complaint Form](#)

1. The Ovida business consists of Ovida Pty Ltd, Jemena Asset Management (5) Pty Ltd and Ovida Infrastructure Pty Ltd.
2. The Zinfra business consists of Zinfra Pty Ltd and its wholly owned subsidiaries.