



Power Club Limited

ACN 603 346 836

POWERCLUB

Privacy Policy

Version 2.1

powerclub



1. WHAT'S THE PURPOSE OF THIS POLICY?

Powerclub's privacy policy is designed to protect the private information you entrust to us. It covers all personal information provided by people including members and other stakeholders.

2. HOW WILL POWERCLUB ACHIEVE THIS?

Powerclub takes your privacy very seriously. We always operate in accordance with the Australian Privacy Principles (principles) as set out in the Privacy Act 1988 (Privacy Act). These principles are designed to protect your confidentiality and privacy by regulating the way your personal information is managed by us.

This document explains how Powerclub collects, holds, uses and disposes of your private records to give you confidence that we take your privacy seriously and manage your data securely.

3. WHY DOES POWERCLUB COLLECT PERSONAL INFORMATION?

Personal information includes details, information and opinions which can be used to help us identify you and your needs. Powerclub only collects information by lawful and fair means.

The main purpose of collecting and recording your information is to establish your membership and provide you with electricity. However, we also collect data from people who contact or engage with us, such as:

- a. members and potential members
- b. employees
- c. personal contacts at corporate clients or suppliers
- d. applicants for employment with Powerclub, and
- e. other individuals we connect with in the ordinary course of business.

The details we collect will depend on the way a person has interacted with us and help us to:

- verify identities and personal information
- deal with applications, enquiries or concerns
- register someone as a new member
- administer a member contract, transfer or relationship
- market or research products and services
- provide, maintain and improve products and services
- carry our credit checks on current and prospective members
- ensure we receive payments due and can make payments to members and others
- manage relationships with individuals and organisations
- consider applications for employment
- comply with legal and statutory obligations
- prevent, detect, investigate and deal with unlawful activity and misconduct (whether actual or suspected)



The types of personal details we ask for and record may include:

- your name
- your contact details
- identification information
- your organisation and the position you hold
- information in forms you submit
- payment details, and
- enquiry or complaint details
- historical information

To help us understand your personal preferences, Powerclub records how you have interacted with us including any contact we have with you by telephone, email or online. This will help us deliver the best service possible and communicate better to you in the future.

We understand that some information may be considered sensitive such as racial or ethnic origin, political opinions, political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, genetics, biometrics or health. Powerclub will always ask for your consent prior to collecting, using or disclosing sensitive information unless collection of that information is required or authorised by law.

Powerclub may need to collect details on your health or organisational affiliation to determine your eligibility for specific discounts, services or treatment (for example, hardship).

4. HOW DOES POWERCLUB COLLECT PERSONAL INFORMATION?

Powerclub can collect information about you through our business activities such as events, mail, telephone, email and online. We may monitor and record our interactions with you (including email and telephone conversations) and use video or audio recordings for security, record-keeping and training.

If you move into a house that was previously supplied by Powerclub, we will still be the responsible retailer for that electricity meter. Until you join as a member, you will be placed on a standing offer which is more expensive because it is a default contact. Powerclub will try to collect your contact information from public sources such as body corporates, telephone listings and third-party sources such as builders or real estate agents so that we can offer you membership and the cheaper market offer. Because Powerclub doesn't profit from your consumption, we have the freedom to be completely focused on what's best for you.

Where people provide us with contact details for someone else, our policy is that person must first give their consent to be contacted.

5. HOW DOES POWERCLUB USE PERSONAL INFORMATION?

Some of the reasons why we may need to record your personal details are stated above, under question three. Powerclub is different. We are member-owned and because you own the company, it works better for you. We value openness and innovation which would be difficult to achieve without rich data recorded from members and potential customers. The information you provide will help us deliver more of the services you want, communicate better, innovate to expand your options and disrupt an incumbent industry.



Powerclub will analyse your preferences so we can offer certain information, products, services and special offers we believe you might be interested in. We may contact you via telephone, email, SMS, websites and mobile apps to keep you updated. If you choose to exit the Powerclub offer, we may continue to communicate with you but only within the limits of associated legislation and rules.

If you do not wish to be contacted for promotional purposes, or if you no longer wish to receive Powerclub communications, you can choose to unsubscribe. If you need help doing this, you can contact one of our local agents on info@powerclub.com.au

Other ways we may use and disclose your personal information may be in connection with:

- a. acquisitions of our business
- b. service providers and specialist advisers who have been contracted to provide administrative, financial, research, archival, auditing, accounting, member contact, legal, business consulting, banking, payment, delivery, data processing, data analysis, information broking, research, marketing, investigation, website, technology or other services
- c. insurers, lawyers, courts, tribunals and regulatory authorities (including the Australian Tax Office) as required or authorised by law or in accordance with their reasonable information requests
- d. insurance investigators
- e. member representatives and anyone else you authorise to be contacted on your behalf

All third parties, as described above, will be located in Australia however the countries named in this policy may change from time to time. You can see an updated list of countries in the current version of this privacy policy, which is available on request or via www.powerclub.com.au

6. HOW WILL POWERCLUB ENSURE CONSISTENCY WITH OUTSOURCED SERVICE PROVIDERS?

Powerclub will ensure that the privacy policy of any outsourced service provider is supportive of the Powerclub privacy policy.

7. HOW WILL POWERCLUB MANAGE SENSITIVE INFORMATION?

Powerclub will not collect, use or disclose any of sensitive information without first obtaining your consent. The only objection to that rule is if it is required by law to collect, use or disclose that information. Sensitive information may include:

- Racial or ethnic origin
- Religious beliefs or philosophical opinions
- Political opinions or party associations
- Trade union membership
- Professional association membership
- Sexual preferences or practices
- Criminal record
- Health information



8. HOW DOES POWERCLUB MANAGE INFORMATION HELD?

8.1. General Information

Powerclub is subject to laws requiring us to protect the security of your personal information once it comes into our possession. However, Powerclub's online sites may contain links to third party websites or services. Powerclub is not responsible for the privacy practices or policies of those sites or services.

8.2. Members

Powerclub takes all reasonable steps to keep your details accurate, complete and up to date. The technology and organisational platforms we have in place help achieve this. Powerclub take all reasonable steps to avoid unauthorised access, modification or disclosure of personal information by employees, contractors and third parties. Our employees and contractors are expected to comply with the Privacy Act, and Powerclub will take appropriate steps to provide training and address any breaches.

We may disclose your information to service providers performing operational and service functions on our behalf. Powerclub will only disclose your information to these organisations when it is necessary for the services they provide. We will ensure your information is treated in accordance with the standards that apply in Australia.

Powerclub may exchange your details with debt buyers and any relevant loyalty program partners. Please see your contract terms and conditions for further terms relevant to member privacy. If you apply for or obtain services from Powerclub on credit, then the Credit Reporting Policy (available on request and via www.powerclub.com.au) may be relevant.

Powerclub is not likely to hold or collect personal information about vulnerable segments of the community (such as children).

8.3. Online

Powerclub operates a range of online services to provide information and services. These may include the website (www.powerclub.com.au), mobile apps, email and social media profiles.

Our social media platforms and website may use 'cookies' to help us identify and interact more effectively with you across your devices. The cookie helps maintain the continuity of your browsing sessions and will remember your details and preferences the next time you return. You can configure web browser software to reject cookies however some parts of Powerclub's website may not have full functionality in that case.

In some cases, third parties may use cookies and other technologies via Powerclub's social media platforms, website or apps for online services like banner advertising, traffic analytics and surveys. This may allow them to collect information about how you interact with Powerclub's online facilities including recording your computer's IP address. This information may be stored in the United States or other countries.

The use of these technologies allows Powerclub and third parties to deliver customised advertising content, measure the effectiveness of advertising, evaluate how you use interact online and record website activity and internet usage. Those third parties may also transfer



the information they collect to others if required to do so by law, or where those others process the information on their behalf.

The services Powerclub may use from time to time include Google Analytics, Google AdSense, DoubleClick, Yahoo, Adobe and Microsoft. You can find more details in the privacy policies for those services, including information on how to opt-out of certain conduct.

9. HOW DOES POWERCLUB ASSESS MY PERSONAL INFORMATION?

You have the right to access your personal information and can request to receive a copy by contacting us by email at info@powerclub.com.au. Depending on the information requested, we may ask you to complete an appropriate form, verify your identification, or pay a fee to cover our costs. Any fee will not be excessive.

Under some circumstances prescribed by the Privacy Act, you may be refused access to information. For instance, if providing access would be unlawful or have an unreasonable impact on the privacy of others.

If you want Powerclub to give other individuals access to your personal information, you need to provide written authorisation to Powerclub by emailing us at info@powerclub.com.au

10. HOW CAN I CORRECT MY PERSONAL INFORMATION?

Powerclub will work to ensure that any personal records we hold are correct and up to date. However, if your details have changed or are incorrect, we ask that they inform us by emailing info@powerclub.com.au

11. HOW OFTEN WILL THIS POLICY BE REVIEWED?

The privacy policy will be formally reviewed on an annual basis. The aim of this review will be to assess the success of the current policy and to determine potential improvements that will benefit you, members, employees or other individuals, as well as incorporating any change to statutory or market circumstances.

12. HOW WILL POWERCLUB COMMUNICATE THIS POLICY?

On appointment, Powerclub staff will be made aware of this policy through standard training modules.

Once Powerclub becomes operational and prior to making any energy offers to the public, the privacy policy will be available via:

- via the Powerclub website www.powerclub.com.au
- via email info@powerclub.com.au
- by calling one of our service team

13. HOW DO I MAKE A COMPLAINT?

If you would like further information about a privacy related issue, have a complaint about the collection, accuracy or disclosure of your personal information or wish to make a comment or



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suggestion on the effectiveness of Powerclub's privacy policy, please contact us in writing at info@powerclub.com.au.

You have the right to make a complaint anonymously where it is practicable and lawful to do so.

Powerclub will reply to any complaint within a reasonable time and no later than 30 days after receiving the complaint. If you're not happy with Powerclub's complaint handling process, you have the right to take the complaint to the office of the Australian Information Commissioner. You can obtain their contact details from their website at www.oaic.gov.au.

If you still feel that we have not resolved your complaint, you can also contact the Energy Ombudsman in your State:

State	Contact details
Energy and Water Ombudsman NSW	Telephone: 1800 246 545 Website: www.ewon.com.au
Energy and Water Ombudsman Victoria	Telephone: 1800 500 509 Website: www.ewov.com.au
Energy and Water Ombudsman SA	Telephone: 1800 665 565 Website: www.ewosa.com.au
Energy and Water Ombudsman QLD	Telephone: 1800 662 837 Website: www.ewoq.com.au
ACT Civil and Administrative Tribunal	Telephone: 02 6207 1740 Website: www.acat.act.gov.au
Energy Ombudsman Tasmania	Telephone: 1800 001 170 Website: www.energyombudsman.tas.gov.au

