

PRIVACY POLICY

At Exetel, the protection of your personal information is a priority for us. Our Privacy Policy (this document) outlines how we collect, use, store and most importantly, how we protect your information, so please take the time to have read through and see what we are doing.

Exetel complies with Australian government laws and obligations towards your privacy under the Telecommunications Act 1997 (Cth), Telecommunications (Interception and Access) Amendment (Data Retention) Act 2015, the Do Not Call Register Act 2006 (Cth), the Spam Act 2010 (Cth) and Privacy Act 1988 (Cth), and is bound by the Australian Privacy Principles (APPs) set out in the Privacy Act 1988 (Cth). Further information about this can be found at the website of the Office of the Australian Information Commissioner; www.privacy.gov.au and Attorney-General's Department at cac@ag.gov.au.

Exetel will take reasonable steps to ensure you are aware we are collecting your personal information, who is collecting it (which area of Exetel), which laws authorise or require us to, the purpose of the collection, how it may be disclosed and to who, and whether the information will be transferred outside of Australia. We'll also tell you how to access our Privacy and Complaint handling policies and procedures.

Why Exetel collects your personal information

We collect your information only when it is reasonably necessary for the purposes of providing you services and products.

Some examples of this include:

- To verify who you are (your identity),
- To process your application for a service,
- To best answer your questions or concerns,
- To manage your services when you are with us,
- To carry out checks for credit-worthiness or fraud,
- To see if we can supply you a service in the first place,
- To understand how we can best serve you on an ongoing basis,
- To ensure we let you know in an appropriate manner about what we can offer you in the future,
- To best manage our own business, and
- To comply with all our legal and regulatory obligations.

In order for us to do this, Exetel collects and holds personal information about: prospective customers who have expressed an interest in learning more about, or obtaining our products and service; current customers who hold our services and products; and past customers who have had an Exetel service or product but do not currently have an active Exetel account.

The type of personal information we collect.

The type of information we collect relates directly to what is reasonably necessary for Exetel's business activities and can include a wide range of personal information. For example, Exetel collects personal information which includes or may include: your name or change of name (such as by deed poll or marriage certificate), address

and/or occupancy status, date of birth or death (death certificate), gender, occupation, contact details, payment information, credit information including financial and employment history, drivers' licence and/or other government identification numbers, usage information such as the calls you make or the data volumes you use, passwords and location. Exetel also collects information about purchasing patterns, consumer preferences or attitudes from prospective, current and past customers for the purposes of developing products and services and for marketing purposes.

You may not wish to provide us this information or remain anonymous, however we may not be able to provide you with the product or relevant services you've requested or give you the service you expect.

Generally, we don't need any sensitive information from you such as details about your race, ethnicity, political views, religious or philosophical beliefs, sexual preferences, health, genetics or criminal records as it has no bearing on the services we provide.

Sometimes our customers do choose to tell us about their health if this has a bearing on the communication services they expect from Exetel, and this information is collected and stored only with their permission and only for the purpose it was provided for.

How Exetel collects your personal information

Mostly, Exetel will collect most personal information directly from you. For example, when you fill in a form online on our website, call us and give it to us over the phone or email us, or contact us via social media platforms such as Facebook or Twitter.

We may also collect information indirectly through other sources. These include:

- When you use a product,
- A survey you completed,
- Responses you've made to an offer or promotion,
- When you pay your bill,
- When you use self-service channels,
- From our equipment,
- Through our employees, agents, contractors or suppliers,
- Third parties service providers, including, without limitation, commercial associates, credit reporting bodies and
- credit providers,
- From publicly available sources such as through the purchasing of marketing lists, database and data aggregation services,
- From our customers' authorised representatives, and
- When we are required by law to do so.

Sometimes other people will give us personal information about you such as your employer (if you are using a business product) or a parent, guardian or trustee. We may also collect personal information from third parties if they are able to disclose it to us, if it's not practicable to collect it from you. We may for instance, buy or obtain personal information from trusted sources to help us to identify people or businesses who may be interested in hearing about our services or products. Other ways we collect information include via online activity. These may include:

- Via your Internet Protocol (IP) address, for example, to help diagnose problems with our own internet access, to administer our website, or if required by law to do so,
- Through site performance identifier which gives us information about how our websites are being used, and
- Through analytic or advertising "cookies" or digital identifiers, which are usually small lines of text that are stored with your Web browser for record keeping purposes, and which we use to obtain statistical information and to understand what advertising may be relevant. Your browser has options in its

security settings to accept, reject or provide you with a notice when a cookie is sent, and you can clear these and disable future use of cookies and digital identifiers if you want to.

How Exetel holds your personal information

At Exetel we have a series of security measures in place to protect your personal information. We keep customer information in controlled systems that are protected with authorised access only and prevent copying of your personal information. We use secure server and closed network environments and encrypt data in transit. We manage and access privileges to ensure your personal information is limited to only those who require it. We also provide continuing training to our staff and regular security reviews and we have dedicated teams who monitor and maintain this. Most importantly, we remain attentive to protecting your personal information. The controls are the same and just as strict, irrespective of where your Exetel staff member is located.

Exetel protects your personal information by:

- Completing ID checks to verify your identity and to check the details we hold about you are correct and up-to-date,
- Regularly monitoring, training and quality assessing our staff in matters of privacy,
- Storing all data in secure centres in Australia only,
- Providing system access only via controlled logins and different security and authorisations levels that ensure access to information for all staff is related only to the job role they perform and have been trained for,
- Ensuring functional restrictions apply including remote access being applied to limited people specifically to perform their mandated job role,
- Securing our property and operational systems with authorised security access only,
- Ensuring system access and modification to customer records is logged under the specific staff member and conducting occasional audits to monitor this activity,
- Applying security restrictions to copying, printing and recording information and limiting access to such operations to authorised personnel only, and
- Implementing strict security protocols on the transfer of data within Exetel, including but not limited to access points in Sri Lanka.