

LevelUP Solutions

Privacy Policy

1. Introduction

This statement is the privacy policy of LevelUP Solutions Pty Ltd and its wholly owned Australian subsidiaries. It sets out how we manage your personal information and other information. Before we go into the detail, we need to define a few terms. This bit can get a bit technical, so please bear with us:

Your information: When we refer to your information, we are referring to both your personal information, as defined under the Privacy Act 1988 (Cth), and any customer information protected by Part 13 of the Telecommunications Act 1997 (Cth).

Sensitive information: The Privacy Act 1988 (Cth) defines some types of personal information as sensitive. We don't commonly collect sensitive information, which includes information about a person's race, ethnic origin, political opinions, health, religious or philosophical beliefs and criminal history. In the event we require any sensitive information we would only collect this with your permission, and we will only use it for the purpose for which you provided it.

Credit Reporting Policy: This sets out how we manage your credit information and credit eligibility information where this is relevant to you, and is our credit reporting policy for the purposes of Part IIIA of the Privacy Act.

2. Collection of your personal information

2.1 What kind of Information we collect and hold

Depending on the particular circumstances, we may collect and hold a range of different information about you. This can include your name, date of birth, contact details (including address, email address, phone number or mobile telephone number), occupation, driver's licence number, username or password, financial information (such as credit card or bank account numbers) and information about how you use our products and services.

This is not an exhaustive list. For example, we may sometimes need to collect additional information as part of a user authentication process, such as when you want to speak to one of our customer service personnel who need to access your account.

You might also need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them about this statement.

2.2 How we collect your information

We may collect your information in a number of ways, including:

- directly from you (such as where you provide information to us when you visit one of our stores or websites, complete an application form or agreement for one of our services, or contact us with a query or request)

- from third parties such as our related entities, business or commercial partners, credit reporting bodies (for more details see our Credit Reporting Policy below), wholesale or other customers, or your representatives
- from publicly available sources of information
- from our records of how you use your LevelUP Solutions products or services
- from the third parties we list in the section of this Statement with the heading When we disclose your information
- as required under the data retention provisions of the Telecommunications (Interception and Access) Act 1979 (Cth)

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, or the level of service on which we pride ourselves.

3. Storage of your Personal Information

We may store your information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We take the privacy and security of your information seriously and we are committed to maintaining the security of your information under our control. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure.

While we take these steps to maintain the security of your information, you should be aware of the range of information security risks that exist today and take appropriate care to help safeguard your information.

4. Use of your personal information

We may use your information for a range of different purposes, including:

- to provide products and services to you, to provide you with information about those products and services, to assist you with enquiries or purchases, to enhance your experience of our products and services, and to provide you with better customer service
- to administer and manage the products and services we provide to you, to charge and bill you for them, and to collect any amounts you may owe us
- to gain an understanding of your information and communication needs, to improve or develop our products and services, or to perform research and analysis
- to monitor network use, quality and performance, and to operate, maintain, develop, test and upgrade our systems and infrastructure
- to verify your identity or to conduct appropriate checks for credit-worthiness and for fraud
- as required or authorised by law (including under the Telecommunications Act 1997 (Cth) and the Telecommunications (Interception and Access) Act 1979 (Cth)).
- as required by or in accordance with any industry code or industry standard registered under the Telecommunications Act 1997 (Cth).

4.1 Marketing Usage of your Personal Information

We may also use your information so that we, our related entities, dealers and other business or commercial partners can promote and market products, services and special offers that we think will be of interest to you (which may include products, services and offers provided by a third party). This marketing may be carried out in a variety of ways (including by email, SMS/MMS, or social media or by customising on-line content and displaying advertising on websites) and may continue after you cease acquiring any products or services from us until you opt-out. You may opt out by calling us or updating your preference by logging into your account online.

5. When we disclose your Personal Information

We may disclose your information to third parties who provide services to us, including organisations and contractors that assist us with the purposes for which we use your information. These services include:

- customer enquiries and support services
- installation, maintenance and repair services
- mailing operations, billing and debt-recovery functions
- information technology and network services
- market research, marketing, telemarketing and door-knocking services

We may also disclose your information:

- to your authorised representatives or advisers, or when you ask us to do so
- to credit-reporting bodies and fraud-checking agencies, and to credit providers for credit related purposes such as credit-worthiness, credit rating, default listing, credit provision and financing
- our dealers, our related entities or our business or commercial partners
- to other telecommunication and information service providers or to our wholesale and other customers from or through whom you may acquire products or services (for example, we may need to disclose your information for billing purposes)
- to the Government's National Document Verification Service, to verify the validity of any Government issued documentation you provide as proof of identity ie: to check a Drivers Licence, Medicare, Passport ect.
- as required or authorised by law, including to law enforcement and national security agencies, and other government and regulatory authorities
- to third parties who assist us to manage or develop our business and corporate strategies and functions, including our corporate risk or funding functions
- for the purposes of facilitating or implementing a transfer/sale of all or part of our assets or business
- to third parties as required by or in accordance with any industry code or industry standard registered under the Telecommunication Act 1997 (Cth).

In some cases, the organisations to who we may disclose your information may be based outside Australia. For example, we may disclose your information to our service providers in Canada, China, Hong Kong, countries within the European Union, India, Japan, Malaysia, New Zealand, Philippines, Russia, Singapore, South Africa, South Korea, Sri Lanka and the United States of America.

6. Changes to this Privacy Policy

This Statement has been issued by LevelUP Solutions Pty Ltd and its wholly owned Australian subsidiaries, effective as at 6 Nov 2016. From time to time, we may need to change this Statement. If we do so, we will post the updated version on our website and it will apply to all of your information held by us at the time.

7. Accessing Your Personal Information

If you wish to access any of your personal information that we hold or would like to correct any errors in that information, please contact us using the contact details set out in the **Contacting Us** section of this Statement, so that we can consider and respond to your request. We may apply an administrative charge for providing access to your personal information in response to a request.

You may also use these contact details to notify us of any privacy complaint you have against us, including if you think that we have failed to comply with the Australian Privacy Principles (APP) or any binding APP code that has been registered under the Privacy Act. We are committed to acknowledging your complaint in a prompt manner and will give you an estimated timeframe for when we will respond to your complaint.

While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, you may also be able to lodge a complaint with a relevant regulator such as the Australian Information Commissioner (www.oaic.gov.au) or the Telecommunications Industry Ombudsman (www.tio.com.au).

8. Data ownership

We acknowledge that while data may reside on our physical infrastructure we are only guardians of any corporate and personal data. You remain the legal owner of all enterprise-wide tenanted data.

You retain the ability to create, edit, modify, share and restrict access to the corporate data and retain the ability to assign, share or surrender all of these privileges to a third party. You claim all possession and copyrights to such data and retain ability to take legal action if ownership is illegitimately breached by an internal or external entity.

9. Contacting us

LevelUP Solutions welcomes your comments regarding this Privacy Policy. If you have any questions about this Privacy Policy and would like further information, please contact us by any of the following means during business hours Monday to Friday.

Call: +61 (7) 3385 5237

E-mail: [contact-us \[at\] levelup.solutions](mailto:contact-us@levelup.solutions)