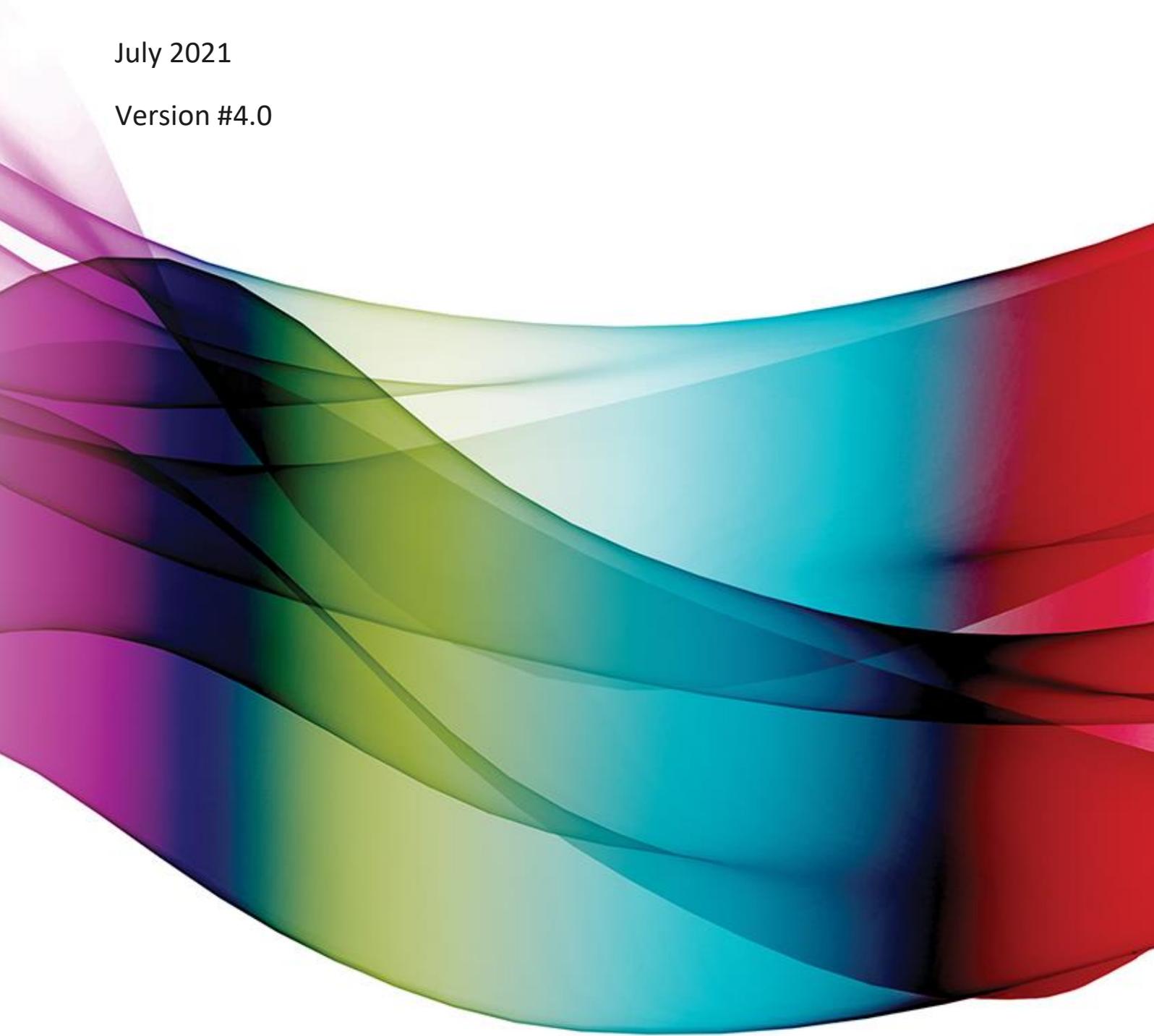


Privacy Policy

July 2021

Version #4.0

A decorative abstract graphic at the bottom of the page, consisting of overlapping, flowing, semi-transparent bands of color in shades of purple, blue, green, and red, creating a sense of movement and depth.

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1. Policy Overview

The fundamental objective of the Privacy Policy is to ensure that TasNetworks complies with its obligations under *The Privacy Act 1988* (Cth) (**Privacy Act**) and the *Personal Information Protection Act 2004* (TAS) (**PIP Act**).

This policy is a Level **2** policy, see the *Policy Framework* for further information.

Use of the term “personal information” in this policy is to personal information as defined in each of the Privacy Act and PIP Act. The definitions overlap, and can generally be considered to be information or an opinion about an identified individual or an individual who is reasonably identifiable.

2. Who does this Policy apply to?

This policy applies to all of TasNetworks’ leaders and team members. It also affects TasNetworks’ customers and service providers.

This policy also applies to companies within the TasNetworks Group, and a reference to TasNetworks in this policy includes a reference to group companies.

The TasNetworks Group means TasNetworks and its subsidiaries. TasNetworks’ subsidiaries as at July 2021 are TasNetworks Holdings Pty Ltd, Fortytwo24 Pty Ltd, Marinus Link Pty Ltd and Large Scale Renewables Pty Ltd.

3. The Policy

3.1. Purpose

TasNetworks (referred to in this document as **we, us** or **our**) recognises that the privacy of all people that we deal with (including employees and people external to the organisation, referred to in this document as **you** or **your**) is very important and we are committed to protecting the personal information we collect from you. TasNetworks is the custodian of any personal information you provide to us in the course of TasNetworks conducting its business.

The Privacy Act, the Australian Privacy Principles (APPS) and the PIP Act govern the way in which we manage our personal information and this policy sets out how we collect, use, disclose and otherwise manage personal information about you and your rights in relation to that information. Please do not send us any of your information if you do not want it to be used in the ways described in this Privacy Policy.



4. Scope

This Privacy Policy applies when we receive any personal information about you, including in the following circumstances:

- when you request information from us or provide information to us;
- when you or the organisation you work for engages our services;
- as a result of your employment or other relationship with one or more of our customers;
- when you apply for a role or work placement opportunity, open day or recruitment event with us;
- when we conduct open source searches on you in connection with our business acceptance or business development processes;
- when you visit our websites and online services (including our mobile apps or completing online application forms);
- when you are entered onto our mailing lists to receive publications and other marketing emails.

If you are an employee of TasNetworks, your employee records are not subject to the APPS and can be accessed or disclosed by us provided certain conditions are met

5. Policy Detail

5.1. Types of information collected

We may collect personal information directly from you, or your authorised representatives about you, that is relevant to providing you with the services you are seeking or our broader business operations. Related to this purpose, we may also collect your personal information from third parties such as regulatory authorities, your employer, other organisations with whom you have dealings, government agencies, credit reporting agencies, recruitment agencies, information or service providers, publicly available records and other third parties.

This information may include your name, date of birth, current and previous address details, telephone numbers, email addresses, occupation, employment and health details, interests in land, billing and financial information (such as billing address, bank account and payment information) and enquiry/complaint details and information relating to your contract with us to connect and supply electricity to your home or business.

When you use our online services, we may also collect the following:

- Information you provide by completing subscription, registration and application forms (including when you submit material or request further services);
- Information you provide to us if you contact us, for example to report a problem with our online services or raise a query or comment; and



- details of visits made to our online services such as the volume of traffic received, logs (including, the internet protocol (IP) address and location of the device connecting to the online services and other identifiers about the device and the nature of the visit) and the sub sites accessed.

If you apply for a job or work placement you may need to provide information about your education, employment, and state of health. Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out both recruitment analytics and any other activities which may be required of us under applicable law as an employer. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks).

Our offices are protected by CCTV and you may be recorded when you visit. We use CCTV to help provide a safe and secure environment for our visitors.

5.2. Purpose of collection

The personal information that we collect and hold about you depends on the type of interaction with us. Generally, we will collect, use and hold your personal information for the purposes of:

- a) verifying your identity;
- b) providing services to you or someone else;
- c) providing you with information about other services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- d) facilitating our internal business operations (including managing your employment, if relevant);
- e) operating, maintaining and upgrading our network (including maintaining the security of TasNetworks sites);
- f) complying with regulatory or legal requirements;
- g) maintaining a record of your power system safety training, authorisations and competencies; and
- h) analysing our services and customer needs with a view to developing new or improved services.

5.3. Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, via email, or through a telephone conversation with you.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected. We sometimes collect personal information from a third party or from a publicly available source, but only if:



- You have consented to such collection or would reasonably expect us to collect your personal information in this way, or
- If it is necessary for a specific purpose.

5.4. Failure to provide information

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else, with the services you, or they, are seeking.

5.5. Internet users

This privacy policy forms part of the website terms of use.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures. We recommend you review the privacy policy that applies to any linked website.

As you are aware, the transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services; any transmission remains at your own risk.

5.6. Use and disclosure

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- a) service providers, who assist us in operating our business, and these service providers may not be required to comply with our privacy policy;
- b) credit and fraud-checking agencies who assist us with our business;
- c) Government, regulatory or public sector bodies (as required or authorised by law, including for purposes other than the purposes for which it was collected, as permitted by the PIP Act and Privacy Act);
- d) other electricity providers (as required or authorised by law);
- e) law enforcement agencies (as required or authorised by law);
- f) your authorised representatives or professional advisors (when requested by you);
- g) our professional advisors; and
- h) other electricity entities for the purpose of confirming your power system safety training, authorisations and competencies.

When making any of the disclosures detailed above we are unlikely to disclose information to an overseas recipient, if however, this does occur we will take all reasonable steps to notify you.

We may also use or disclose information in other circumstances in accordance with the PIP Act and Privacy Act, including where you would reasonably expect us to do so for a purpose related to the purpose for which we collected the information (as set out above).



5.7. Security and location

We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us. We take all reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. Our information security policy is supported by a number of security standards, processes and procedures and we store information in access controlled premises or in electronic databases requiring logins and passwords. We require our third party data storage providers to comply with appropriate information security industry standards. All our employees and third party providers with access to confidential information are subject to strict confidentiality obligations.

Depending on the type of personal information that we hold, we may hold this information in, or may disclose this information to third party service providers located in one or more overseas countries. Where we use cloud service providers to store or manage your personal information, we will take all reasonable steps to ensure that the contract with such providers recognises that we are bound by the Australian Privacy Principles.

Where we disclose personal information to a third party which is located overseas or which will hold personal information overseas, we will take reasonable steps to ensure that the overseas recipient of such personal information handles it in accordance with the standards required under the Privacy Act.

If the personal information is not contained in a State record (as defined in the Archives Act 1983) and is no longer required, we destroy or delete it, in a secure manner in accordance with the Acts provisions.

5.8. Access and updates

The privacy laws in Australia give you the right to access, amend or erase your personal information or, in some circumstances, to restrict or object to the processing of your personal information

You may access the personal information we hold about you, upon making a written request. We will acknowledge your request within 14 days of its receipt, and provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request.

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

The Privacy Act or the PIP Act allow us to decline a request for access to personal information or to request a correction to it in certain circumstances.



5.9. Cookies

We use cookies on our online services. Cookies are small text files that are stored on your device by websites that you visit. They are widely used in order to make websites work to improve their efficiency, as well as to provide website usage information to us. Our website links to third party websites which may also use cookies over which we have no control. We recommend that you check the relevant third party's privacy policies for information about any cookies which may be used. Some cookies we use are strictly necessary to enable you to move around our website and allow its features to work correctly. Without these, functions such as navigating between pages cannot be provided.

5.10 Notifiable Data Breaches (NDB) from 22 February 2018

From 22 February 2018 we are required to notify any individual likely to be at risk of serious harm by a data breach. The Office of the Australian Information Commissioner must also be notified. A data breach occurs when personal information held by us is lost or subject to unauthorised access or disclosure. Exceptions to the NDB scheme will apply for some data breaches, meaning that notification to individuals or to the Commissioner may not be required. Examples of a data breach include when:

- a device containing a customers' personal information is lost or stolen;
- a database containing personal information is hacked; or
- personal information is mistakenly provided to the wrong person,

and may require mandatory notification if the breach causes serious harm to a person.

6. TasNetworks Group

On occasion, the sharing of private information within the TasNetworks Group may be required. This will be done only where you have consented, where you would reasonably expect us to do so for a purpose related to the purpose for which we collected the information, or otherwise as provided for under the Privacy Act or PIP Act.

7. Roles and responsibilities

All TasNetworks' Leaders and Team Members have a responsibility for advancing the Privacy Policy under these existing policies and principles.



8. References

- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- Personal Information Protection Act 2004 (Tas)

9. Compliance

All team members are responsible for complying with this policy, and any breaches of this policy will be treated seriously and may result in disciplinary action being undertaken.

Public Interest Disclosure Statement (“Whistleblowers”)

If an individual is concerned about consequences associated with reporting a serious breach of this Policy, that individual should refer to the Whistleblower Policy available on The Zone or talk to their Leader.

10. Need to know more or have a question?

10.1. Contact us

Complaints and enquiries about the treatment of personal information (including a possible breach of privacy) by us must be made in writing (a letter or email), addressed to the Privacy Officer. We will treat complaints confidentially. We will respond within a reasonable time after receipt of the complaint (usually 30 days).

If an individual is not satisfied with our response, they may make a further complaint to the Australian Information Commissioner. Details of how to make a complaint are available on the Office of the Australian Information Commissioner website.

Individuals can obtain further information in relation to this privacy policy, or provide any comments, by contacting our Privacy Officer as follows:

The Privacy Officer
Tasmanian Networks Pty Ltd.
1-7 Maria Street
Lenah Valley TAS 7008

Email: Privacyofficer@tasnetworks.com.au



11. Administration of this Policy

This policy is administered by Legal Services and will be reviewed and endorsed at least annually or when there is a significant change to the business that impacts this Policy.

Authorisations		
Action	Name	Date
Prepared by	Legal Services Leader / Corporate Counsel	June 2014
Reviewed by	Company Secretary and General Counsel	June 2014
Authorised by	Chief Executive Officer	June 2014

Document control				
Date	Version	Description	Author	Approved by
June 2014	0.1	Original version for approval by CEO	Legal Services Leader	
June 2014	1.0	Version for publication	Legal Services Leader	CEO
July 2017	2.0	Revised version for approval	Corporate Counsel	CEO
May 2018	3.0	Revised version for approval by CEO	Corporate Counsel	CEO
July 2021	3.1	Draft Revision for review	Corporate Counsel	Leader, Legal Services
July 2021	3.2	Draft Revision for review	Corporate Counsel	Company Secretary and General Counsel
July 2021	4.0	Revised version for approval	Corporate Counsel	A/CEO

