



Privacy Policy

1. About us

Circular Energy is a trading name of Maximum Energy Retail Pty Ltd (MER) which provides a wide range of energy and other products and services. This policy describes how we handle your personal information and credit related information.

You can find out more about Circular Energy on our website.

2. Your privacy

We keep your information safe. We aim to be clear and open about what we do with it.

We understand that your privacy is important to you, and we value your trust. That's why we protect your information and aim to be clear and open about what we do with it.

This policy describes how we handle your personal information and credit-related information.

Personal Information is information that identifies you or can be reasonably linked to your identity.

Credit-related information is information about how you manage your credit, the credit that you have applied for or obtained, your payment history and creditworthiness and the information contained in your credit file.

When we collect this information, we follow the obligations set out in the Privacy Act 1988 (Cth).

We update our privacy policy when our practices change. You can always find the most up-to-date version on our website.

3. What information do we collect?

We collect information about you when you interact with us. We may also collect information about you from other people and organisations.

We only collect your personal information when we need it to provide our products and services or to comply with the law. The kinds of information that we collect depends on how you interact with us. Here are some examples.

Information we collect from you

We collect the name and contact details (landline, mobile, email) of our customers and their authorised representatives as well as shareholders, business contacts, job applicants and contractors and others. We may also collect:



- If you are a customer: Your date of birth, address (supply and mailing if different), address history (where relevant), concession details (where applicable), other forms of identification (such as driver's licence or passport), payment details, ABN (if applicable) and information about your property that you tell us and your use of our products and services including energy usage and consumption information. For example, how much energy you use and when you use it. We may also collect information about appliances used and the timing and efficiency of use where you have sensors or other technology installed.
- If you are an authorised representative on another person's account: first name, last name, date of birth, telephone number, address and the relationship with our customer.
- If you are a shareholder: Your tax file number, if you provide it.
- If you apply for a job with us: Information that you provide about your right to work, employment history, qualifications and ability.
- We collect information when you interact with us using the channels we make available to you - online, through our app, direct contact with our contact centre, social media, and using voice tools (including Amazon Alexa and Google Home).
- If you give us personal information about other people, we will assume that they have agreed that you can do this.

Information we collect from others

When you get a quote to apply to open an account with us: Your credit history information.

We collect credit-related information from credit reporting bodies about you when you set up an account with us or when your account is in default. This information can be found on your credit file, including the fact that you have applied for credit, the amount and type of credit, details of your current and previous credit providers, start and end dates of credit arrangements, and information about listings on your credit file including defaults and court judgments.

We collect credit-related information from other Maximum Energy Group companies, from public sources, and from other third parties including government agencies such as the Australian Financial Security Authority which manages the National Personal Insolvency Index.

When you use our websites, mobile apps and platforms: Your IP address, device identifiers and information about how you use our websites such as session information and login attempts. We use web analytics services to do this. These services include: Google Analytics, Google AdSense, DoubleClick, Adobe or Microsoft.

When you participate in market research: Information about you and your responses from the service provider that conducted the research.

When you engage with our sales partners: Your name, address and contact details, so we can contact you about products you may be interested in.



If you are a business contact for our customers or service providers: Your name, job title and contact details.

If you are a shareholder: To comply with the law and manage your shares in MER, we may collect details about your investment from our shareholder register service provider. You can find more information on our Shareholder Services page on our website.

If you apply for a job with us: Professional background, qualifications and memberships, and references from your former employers. Where it is relevant to the role, we may also collect screening check information (such as background, medical, drugs and alcohol, criminal records, bankruptcy, directorship and company checks), and abilities testing, including psychometric testing.

Sensitive information

The Privacy Act protects your sensitive information, such as information about your health or ethnicity. Where we need this information for your account (for example, to ensure continuous service to your property or to assist with translation services), we'll ask for your permission - except where otherwise allowed by law.

4. How do we use your information?

We use your information to deliver our products and services, manage our business and comply with the law. We also use your information for other reasons, such as to better understand you and your needs.

We collect and use your information, so we can:

- confirm your identity
- provide you with the products and services that you have asked for
- handle payments and refunds
- communicate with you about your account
- manage your credit arrangements with us
- manage accounts that are overdue, including where we sell debt
- respond to applications, questions, requests or complaints that you have made to us
- maintain and update our records and carry out other administrative tasks
- improve customer experience and do market research
- if you are a shareholder, manage your shareholding
- if you have applied to work with us, assess your application
- investigate possible fraud and illegal activity
- comply with laws, including assisting government agencies and law enforcement investigations, and
- manage our business.



If we don't have your personal information, we may not be able to do these things. For example, we may not be able to deliver the products or services you have asked for or respond to your questions.

Direct marketing

We may also use your personal information to tell you about products or services that we think you might be interested in. We may send you marketing messages in various ways, including by mail, email, telephone, SMS, and digital marketing including advertising through our apps, websites, social media or third-party websites.

If you tell us how you would prefer to be contacted, we will contact you in that way where we can.

If you don't want to receive direct marketing messages, you can opt out by:

- filling out a Do Not Contact form on our website
- contacting our Customer Solutions Team (call 131 245, or see section 9 below), or
- following the instructions in any marketing communication you receive from us (for example, using the 'unsubscribe' link in an email or responding to an SMS as instructed)

Please note that we may still send you important administrative and safety messages even if you opt out of receiving marketing communications.

The way we use data

We're always working to develop and improve our products and services, and improve our processes to ensure that they and we better meet your needs.

New technologies let us combine information we have about our customers and users with data from other sources, such as third-party websites or the Australian Bureau of Statistics.

We also collect information about people that does not identify them such as website and advertising analytics, and data from service providers.

We analyse this data to help us learn more about our customers and improve our products and services. Where we work with partners or service providers to do this, we do not pass on personal information about you.

5. Who do we share your information with?

We share your information for the purposes set out in section 4, with our service providers, and to comply with the law. When we do this, we take steps to keep your information safe.

We share your personal information with other people and companies where we need to for the purposes set out in section 4. This includes sharing:



- with our installation, maintenance and fulfilment partners, so they can make installations and maintain products and services that we offer
- with other energy companies and other companies (like those that own or operate poles and wires) that help us deliver our products and services, or to migrate your service if you change energy providers
- with credit reporting agencies to process new applications, assess and manage applications for credit, manage overdue accounts, and review your creditworthiness
- with insurance investigators
- with people that you have asked us to give your information to, such as your authorised representatives or legal advisors
- if you have applied to work with us, with your previous employers to confirm your work history
- to comply with laws and assist government agencies and law enforcement.

We also share personal information with people and organisations that help us with our business, such as professional advisors, IT support, and corporate and administrative services including mercantile agents (including debt collectors) and debt buyers. We only do this where it's needed for those services to be provided to us. When we do this, we take steps that require our service providers to protect your information.

The credit reporting bodies we use include:

Equifax Australia (formerly Veda)

GPO Box 964

North Sydney NSW 2059

Phone: 13 83 32

Website: www.equifax.com.au

Illion (credit reporting & default listing)

(formerly Dun & Bradstreet)

PO Box 7405, St Kilda Rd

Melbourne VIC 3004 Online contact form

Phone: 13 23 33

Email: chc-au@illion.com.au



Website: www.illion.com.au

Experian Australia

GPO Box 1969

North Sydney NSW 2060

Phone: 1300 783 684

Email: creditreport@au.experian.com

Website: www.experian.com.au

CreditorWatch

GPO Box 276

Sydney NSW 2001

Phone: 1300 501 312

Website: www.creditorwatch.com.au

You can contact those credit reporting bodies or visit their websites to see their policies on the management of credit-related information, including details of how to access your credit-related information they hold. You have the right to request credit reporting bodies not to:

- use your credit-related information to determine your eligibility to receive direct marketing from credit providers; and
- use or disclose your credit-related information, if you have been or are likely to be a victim of fraud.

Circular Energy's website links to a number of third-party websites. We are not responsible for the privacy practices of these other sites. We recommend that individual's review the Privacy Policy and Credit Reporting Policy on these websites.

Sending personal information overseas

Some of our service providers are located or operate outside of Australia. Where we need to, we send them information so that they can provide us services. The countries where our service providers may be located are India, Indonesia, Fiji, New Zealand, the Philippines, South Africa, the USA, the UK and some member states within the European Union.



6. Keeping your information safe

We train our staff in how to keep your information safe and secure. We use secure systems and environments to hold your information. We only keep your information for as long as we need it.

We take steps in accordance with the Guide to Securing Personal Information published by the Office of the Information Commissioner, to secure our systems and the personal information we collect.

Here are some examples of the things we do to protect your information:

- Staff obligations and training
- We train our staff in how to keep your information safe and secure.
- Our staff are required to keep your information secure at all times, and are bound by internal processes and policies that confirm this.
- Access to personal information is controlled through access and identity management systems.
- We have security professionals who monitor and respond to (potential) security events across our network.

System security

We store your information in secured systems which are in protected and resilient data centres.

We have technology that prevents malicious software or viruses and unauthorised persons from accessing our systems.

We also share non-personal information about how people use our websites with security service providers to ensure that our websites are protected.

Services providers and overseas transfers

When we send information overseas or use service providers that handle or store data, we require them to take steps to keep your information safe and use it appropriately.

We control where information is stored and who has access to it.

Building security

We use a mix of ID cards, alarms, cameras, guards and other controls to protect our offices and buildings.

Our websites and apps

When you log into our websites or app, we encrypt data sent from your computer or device to our system so no-one else can access it.



We partner with some well-known third parties as alternative ways to access your online account.

Destroying or de-identifying data when no longer required We aim to keep personal information only for as long as we need for our business or to comply with the law.

When we no longer need personal information, we take reasonable steps to destroy or de-identify it.

7. Accessing, updating and correcting your information

You can ask to see a copy of the personal information or credit-related information that we hold about you or ask us to update or correct it.

You can ask us for a copy of the personal information or credit-related information that we hold about you by contacting us. Before we give you your information, we will need to confirm your identity.

If you use “My Account” Online, you can also log in to access your billing information and update your contact and payment details. To access other information, you may need to contact us.

How can you contact us?

See below for contact details

How long will it take?

We try to make your information available within 30 days after you ask us for it. If it will take longer, we'll let you know.

Can we refuse to give you access?

In some cases, we can refuse access or only give you access to certain information. For example, we're not able to let you see information that is commercially sensitive. If we do this, we'll write to you explaining our decision.

Can you correct or update your information?

You can ask us to correct or update any of your personal information or credit-related information that we have. If we've given the information to another party, you can ask us to let them know it's incorrect.

If we don't think the information needs to be corrected, we'll let you know why. You can ask us to include a statement that says you believe our record about you is inaccurate, incomplete, misleading or out of date.



8. Making a privacy complaint

If you're concerned about how we've handled your information, let us know and we'll try to fix it. If you're not satisfied with how we handled your complaint, you can contact the Australian Privacy Commissioner.

How can you make a privacy complaint?

If you are concerned about your privacy or how we've handled your personal information, you can make a complaint and we'll try to fix it.

You can read more about how we handle complaints on our website. You can also read our Complaints and Dispute Resolution Policy.

How do we manage privacy complaints?

We will:

- keep a record of your complaint
- respond to you about your complaint and let you know how we will try to resolve it and how long that may take.

What else can you do?

If you're not satisfied with how we have managed your privacy complaint, you can contact your local Ombudsman at any time for advice or to make a complaint. The Ombudsman is independent, and their services are free.

Energy and Water Ombudsman NSW

Reply Paid 86550

Sydney South NSW 1234

Phone: 1800 246 545

Email: complaints@ewon.com.au

Website: www.ewon.com.au

Energy and Water Ombudsman Victoria

Reply Paid 469



**Circular
Energy**

Melbourne VIC 8060

Phone: 1800 500 509

Email: ewovinfo@ewov.com.au

Website: www.ewov.com.au

Energy and Water Ombudsman Queensland

PO Box 3640 South Brisbane BC

Qld 4101

Phone: 1800 662 837

Email: complaints@ewoq.com.au

or info@ewoq.com.au

Website: www.ewoq.com.au

Energy and Water Ombudsman South Australia

GPO Box 2947

Adelaide SA 5001

Phone: 1800 665 565

Website: www.ewosa.com.au

Energy and Water Ombudsman Western Australia

PO Box Z5386

St Georges Terrace

Perth WA 6831

Phone: 1800 754 004

Email: energyandwater@ombudsman.wa.gov.au

Website: www.ombudsman.wa.gov.au/energyandwater/index.html



You can also complain to the Australian Privacy Commissioner who can be found at the Office of the Australian Information Commissioner (OAIC).

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

9. Contact us

To ask us a question, access your personal information, request a correction to your personal information, make a complaint, or get a printed copy of this policy, you can use our online enquiry form. Or you can contact our Customer Solutions team.

Circular Energy Customer Service

32 Unley Road

Unley SA 5061

Phone: 1300 20 44 62

Email: support@circularenergy.net.au

Website: www.circularenergy.net.au

If you need to contact us about something else, you can find out how on the Contact us page on our website.