

Privacy Policy

June 2017

Version #2

A large, abstract graphic at the bottom of the page consists of overlapping, semi-transparent, wavy bands of color. The colors transition from purple and blue on the left to green, yellow, and red on the right, creating a sense of movement and energy.

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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**).

2. Who does this Policy apply to?

This policy applies to all of TasNetworks' leaders, team members, trainees, and contractors. It may also affect TasNetworks' customers and clients.

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.

The Privacy Act, the Australian Privacy Principles 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.

4. Policy Detail

4.1. Types of information collected

We may collect and hold personal information about you, that is, information that can identify you, and is relevant to providing you with the services you are seeking or to providing services to others.

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, and information relating to your contract with us to connect and supply electricity to your home or business.

4.2. 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.

4.3. 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.

Personal information may also be collected by surveillance camera systems located at TasNetworks sites.

4.4. 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.

4.5. Internet users

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

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name.



We may use information collected on or via the website for the additional purposes of enforcing the website terms of use, protecting any intellectual property rights and to comply with obligations and directions given by or under law, government agency or law enforcement body.

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.

4.6. 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).

4.7. 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.



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 its provisions. 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. Such personal information may be held on mainland Australia or overseas depending on the location of offices of our IT providers. If personal information is held overseas where we use cloud computing services, 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.

4.8. Access and updates

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.

4.9. Notifiable Data Breaches (NDB) from 22 February 2018

From 22 February 2018 we will be 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.



5. Roles and responsibilities

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

6. References

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

7. Compliance

Breaches of this policy by team members will be treated seriously and may if necessary result in disciplinary action being undertaken. Depending on the circumstances of the case, this may include an apology, counselling, training, demotion or termination of employment. Behaviour that is not a breach of this Policy may still be found to be inappropriate or unreasonable. For example, it may be a breach of the TasNetworks Code of Conduct. In this instance, disciplinary action may still result.

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 Public Interest Disclosure (Whistleblowers) Policy available on The Zone or talk to their Leader. .

8. Need to know more or have a question?

All Team Members will have access to (this policy) and underpinning policies on The Zone. Support and further information is available from your Leader, People & Performance Partner or People Direct.

8.1. Contact us

Complaints 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

9. 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	
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