

## NNNCo Privacy Policy – August 2022

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National Narrowband Network Communications Pty Ltd ACN 605 767 913 (**NNNCo**) privacy policy as set out herein describes the types of personal information that NNNCo collects, how it holds, uses and discloses that information and how individuals can gain access to the personal information that NNNCo holds about them.

### 1. The types of personal information collected and held

NNNCo collects personal information needed for its business activities and generally relate to individuals' personal information in their business or professional capacities, as a consequence of a business or potential business relationship with those individuals or the organisations they work for. The types of personal information that NNNCo collects include:

- contact details of individuals and their organisations who are actual or potential customers, suppliers, joint venture associates, officers, employees, contractors and investors or shareholders of NNNCo;
- contact details of individuals that NNNCo deal with at other organisations, such as regulators and government authorities, industry or trade associations and media organisations; and
- contact details and information provided to us by persons and organisations that NNNCo has engaged as part of its service delivery and business activities.

In certain circumstances, NNNCo may also collect personal information about individuals in their private capacities, such as where an individual:

- makes a comment on NNNCo's social media and online channels;
- communicates and/or makes an inquiry with NNNCo;
- files a complaint about NNNCo; or
- subscribes to receive NNNCo's general marketing and other publications.

NNNCo usually does not need to collect any sensitive information (as defined in the Privacy Act 1988 (Cth) (**Privacy Act**)) and, if it needs to do so, it will strictly comply with the Australian Privacy Principles (**APPs**).

### 2. Collection process

NNNCo generally collects an individual's personal information:

- from networking and business meetings;
- from contact forms (including those set out in contractual documents) submitted to NNNCo in hard or soft copy, via its website or other online channels;
- from job applications submitted to NNNCo;
- from share applications submitted to NNNCo;
- from telephone, email, written and in-person enquiries directed to NNNCo; or
- when NNNCo requires bank account details, from creditors who receive payment by direct deposit.

NNNCo may, sometimes, need to collect personal information from a third party, for example, where NNNCo is directed by that third party to make contact with a particular individual with respect to its business activities. In these circumstances and where it is not reasonable for NNNCo to assume that individual has consented to the disclosure of his/her personal information, NNNCo will take reasonable steps to contact that individual so that her/she is aware of the circumstances surrounding the collection and the purposes for which NNNCo has collected his/her personal information.

### **3. Reasons for collecting, holding or using personal information**

Generally, NNNCo only uses personal information that is reasonably necessary for its business activities (the primary purpose) or for a related business purpose such as for:

- managing business relationships and opportunities as well as the marketing of its goods and services;
- performing administrative and organisational functions and to communicate with individuals about its services and/or corporate activities, managing customer/supplier contact or providing customer support;
- providing access and usage rights to individuals using NNNCo's services;
- providing information to individuals regarding events and industry matters;
- responding to enquiries and complaints; and
- attending to administrative functions, such as receiving and making various payments and reviewing and assessing job and share applications.

In most cases, the primary purpose for which NNNCo needs personal information will be apparent from the context in which it has been collected and that where it is not unreasonable for NNNCo to expect the individual will consent to NNNCo collecting and using his/her personal information (where that individual has not provided expressed consent). Where the purpose for which NNNCo uses personal information is not clear, it will take steps to specify the purpose(s) at, or as soon as possible after, the time of collection.

NNNCo may also use personal information to send information to those persons about its activities, including its goods or services, that NNNCo believes may be relevant or useful. A person receiving communication and information from NNNCo may stop receiving such material at any time by contacting NNNCo's Privacy Officer.

In all other cases, NNNCo will only use personal information with the consent of the relevant individual or where it is required or permitted by law to do so.

### **4. Disclosure of personal information**

NNNCo generally only discloses personal information to other persons or organisations for the primary purpose for which we have collected it. It will do so with the individual's implied consent, based on the conduct or from the circumstances in which the information was collected, or explicit consent. NNNCo may also disclose personal information if it is required or permitted by law to do so.

Occasionally, NNNCo must rely on third party contractors to provide services or perform business functions on its behalf, and this may involve a disclosure of personal information by NNNCo to that third party. Wherever personal information is disclosed outside of NNNCo, it will take reasonable steps to ensure that the recipient handles that information in the same way it does and in accordance with the APPs in the Privacy Act. Some of the organisations, or types of organisations, to which NNNCo usually discloses personal information include:

- organisations that provide communication, administration and/or operational services for NNNCo;
- advisers who have been engaged to provide NNNCo with legal, regulatory, financial, equipment installation and other administrative and operational services; and
- other technology and supplier organisations working collaboratively with NNNCo.

NNNCo may provide links to third party websites. Any information provided to the third-party website is outside NNNCo's control and not covered by this privacy policy.

## **5. Storage, security and destruction of personal information**

NNNCo takes reasonable steps to ensure that the personal information it holds is protected from risks such as loss or unauthorised access, destruction, use, modification or disclosure.

Any personal information held by NNNCo is stored only in Australia. Where NNNCo collects personal information from individuals residing outside of Australia, NNNCo may store such personal information in the jurisdictions where the individuals reside. Any NNNCo stored personal information are on a password protected database(s), hard copy files and personal devices including laptop computers which are secured from unauthorised access. NNNCo only allows authorised personnel to access personal information and it is a condition of employment with NNNCo that staff maintain the confidentiality of all information to which they have access.

NNNCo only retains personal information for as long as it is needed or for as long as it is legally required to do so. When no longer required, NNNCo will ensure that such personal information is disposed of or destroyed in a secure manner and in accordance with its legal obligations.

## **6. Online privacy issues**

This privacy policy also applies to any personal information an individual provides to NNNCo online using its website and social media platforms.

NNNCo may also collect data, including personal information, from users of its website in the form of cookies, contact and other application form submissions and online email communications. Forms submitted online to NNNCo are used to collate information so enable NNNCo to communicate with the user, i.e., to respond to queries, applications, complaints or service support ticketing. Cookies are created and may be used to, among other things, measure users' behaviour, improve the performance of NNNCo's website or to target relevant content through third party platforms.

NNNCo also uses analytics platform and website logs to track and monitor information to protect and to continuously improve the content, services and products offered on its website. The information that NNNCO tracks, and monitors include:

- IP addresses;
- login data; and
- page views.

On social media platforms, NNNCo will generally use and disclose personal information only for the purposes of participating in and managing an online conversation (including by responding to individuals' comments) or otherwise noted in this policy. If an individual decides to communicate or otherwise publish personal information about themselves on NNNCo's website and other online channels, then that individual acknowledges that NNNCo cannot control the use of such personal information by other users of its website or other online channels.

NNNCo's website and other online channels may contain links to online services operated by third parties. Users of NNNCo online channels should be aware that when accessing a third-party service, NNNCo is not responsible and takes no responsibility for the privacy practices and policies of that third party. NNNCo's strongly recommends that such users review the privacy policy for each website, social media and other online service that they visit, especially if they intend to disclose any personal information.

## **7. Accessing, correcting and restricting personal information**

Individuals generally have a right to access the personal information that NNNCo holds about them under the Privacy Act. In certain circumstances, NNNCo may be required or permitted by law to withhold access to some or all that information, for example, where NNNCo believes that in doing so, it would prejudice law enforcement or crime prevention activities, pose a serious threat to health or safety, have an unreasonable impact on the privacy of other individuals or otherwise be contrary to law. Individuals have the right to ask for their personal information to be corrected where such information is inaccurate, incomplete or out of date. To do this, please write to NNNCo's Privacy

Officer (details as provided in this policy) and provide contact details as well as appropriate identification to enable verification that the writer is the individual to whom the personal information relates.

NNNCo will also restrict the use of personal information for direct marketing purposes where individuals have so requested. NNNCo will seek consent (expressed or implied) from such individuals in the event it is intending to collect personal information for direct marketing purposes.

## **8. Making a privacy complaint**

To make a complaint in relation to this policy or the way NNNCo's handles your personal information, please contact our Privacy Officer. NNNCo will endeavour to respond to complaints within 30 days of receipt.

Complaint matters may also be referred to the Australian Information (Privacy) Commissioner (see [www.oaic.gov.au](http://www.oaic.gov.au)).

For more information about privacy issues in Australia and privacy protection, please visit the Australian Federal Privacy Commissioner's website at <http://www.privacy.gov.au/>.

## **9. Contacting NNNCo**

NNNCo's Privacy Officer contact details are as follows:

By email: [info@nnnco.com.au](mailto:info@nnnco.com.au)

By post: The Privacy Officer  
National Narrowband Network Communications Pty Ltd  
Level 35, International Tower One  
100 Barangaroo Avenue, Sydney NSW 2000 – Australia

## **10. Currency and update of this policy**

NNNCo may amend and update this privacy policy at any time and interested parties are advised to regularly check for the latest version of this policy.

This Policy was last updated on 1<sup>st</sup> August 2022.