



## GENTRACK AUSTRALIA PRIVACY POLICY

Gentrack Pty Ltd ACN 003 738 449 (**Gentrack, we, us, our**) respects your privacy and recognises the importance of protecting your personal information.

This Privacy Policy sets out Gentrack's policy and principles regarding the handling of the personal information we collect about you.

The website [www.gentrack.com](http://www.gentrack.com) (**Website**) and our social media platforms are owned and operated by Gentrack UK Ltd. For the purpose of this Privacy Policy, a reference to **Gentrack, we, us** or **our** also refers to Gentrack UK Ltd in relation to personal information collected via the Website and our social media platforms about individuals in Australia.

Gentrack Pty Ltd provides billing and data hosting solutions for utility companies that are our corporate customers (**Gentrack Customers**). If you are a customer of a Gentrack Customer, the Gentrack Customer may disclose or provide us with access to your personal information so that we can provide billing and data hosting support to the Gentrack Customer.

This Privacy Policy applies to personal information that we collect from individuals directly, and indirectly from Gentrack Customers.

If you;

- are a customer of a Gentrack Customer;
- make an enquiry with us by phone, email, social media or via our Website;
- visit our Website;
- interact with our social media platforms;
- invest, or make an enquiry about investing, with Gentrack Group Limited;
- subscribe to receive newsletters or information from us;
- supply goods or services to us;
- enter into an agreement with us; or
- apply as a candidate for a position of employment with us,

you have taken to have read, and agree to the collection, use disclosure and handling of your personal information in accordance with this Privacy Policy.

### 1 How we collect your personal information

In this Privacy Policy, **personal information** means information or an opinion (whether true or not), in any form, about an identified individual, or an individual who is reasonably identifiable.

In general, Gentrack collects personal information about:

- individuals who are employees or contractors of **Gentrack Customers**;
- customers of Gentrack Customers;
- users of our Website and our social media platforms;



- investors in Gentrack Group Limited;
- suppliers and contractors; and
- any person who applies to become an employee or contractor of Gentrack.

We aim to collect personal information only if it is reasonably necessary to provide the service, product or information you have requested from us, or is necessary to provide our services and information to Gentrack Customers.

We collect personal information in a variety of ways. Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly. In many cases however, we will collect information about you from a third party, including Gentrack Customers, in connection with our provision of services to those Gentrack Customers.

At the time of collection of your personal information, or as soon as practicable after we have collected it, we will take such steps as are reasonable in the circumstances to notify you of the collection and of any matters relevant to the collection, unless it is obvious from the circumstances that you would know or would expect us to have the information. In many cases, it will not be practicable for us to contact you directly, and we will rely on a Gentrack Customer to notify you that it will (or has) provided us with your personal information.

Gentrack may collect personal information about you when you:

- are a customer of a Gentrack Customer;
- make an enquiry with us by phone, email, social media or via our Website;
- visit our Website;
- interact with our social media platforms;
- invest, or make an enquiry about investing, with Gentrack Group Limited;
- subscribe to receive newsletters or information from us;
- supply goods or services to us;
- enter into an agreement with us; or
- apply as a candidate for a position of employment with us,

or otherwise interact with us in your capacity as a Gentrack Customer, supplier or contractor of Gentrack.

## **2 Information we collect**

The kinds of personal information we collect and hold about you will depend on our relationship with you, the product or service we provide to you or a Gentrack Customer, or if the law requires us to collect it.

If you are a customer of a Gentrack Customer, we may have access to all of the information that that Gentrack Customer (your utility provider) holds about you. We will use the information that is relevant such as your name, postal address, email address, other contact details, financial information and information about the products and services you receive from the Gentrack Customer (including usage, billing and payment information) as is



necessary for the purpose of providing billing and data hosting solutions to the Gentrack Customer.

For other individuals, we may collect the following information about you:

- name;
- postal address, email address, telephone number and other contact details;
- details of the products and services your business has purchased from us or the products and services you have enquired about on behalf of your business, including any additional information necessary to deliver those products and respond to your enquiries; and
- details about you to assist in managing our relationship with you.

If you are a prospective employee, we may collect details about your employment history, other information you provide to us as part of the application process (including your CV, pay expectations and contact details) and other details about you (including notes of screening and interview process) to assist with the recruitment process. We may collect this information from you directly, or from a recruiter.

### **3 Purpose of collection**

When we collect personal information from a Gentrack Customer, we collect and store this personal information on behalf of the Gentrack Customer, solely to assist our Customer in providing you with products and services. We do not use this personal information for our own purposes.

In relation to personal information that we collect other than from Gentrack Customers, we collect that personal information for the following primary purposes:

- to provide you with the goods, services and information that you request from us or from Gentrack Customers;
- to provide you with information about our products and services; and
- to suggest products or services to you.

If it is reasonable to expect that we would use or disclose your personal information (other than information collected from a Gentrack Customer) for purposes which are related to the primary purposes set out above, we may also use or disclose that personal information to:

- develop and improve our customer service;
- promote, advertise and market any of our products, services and events;
- inform you of products and services that can be purchased from us;
- inform you of developments at Gentrack and other services that we can provide;
- comply with our legal obligations (including to comply with any law or any lawful request of a law enforcement agency or government authority), resolve any disputes that we may have with any of our customers and enforce our agreements with third parties such as suppliers; and



- assist you with enquiries or complaints.

### *Direct Marketing*

Excluding personal information we collect from Gentrack Customers, we may use your personal information for direct marketing purposes. Where possible, we will provide you with a choice to opt-out of any of our marketing communications. We will respect your request to decline to receive these marketing communications.

## **4 Information collected through our Website**

Gentrack collects certain information about you automatically when you use our Website through the use of cookies. Cookies allow Gentrack to record certain information about you when you use the Website, including details of your domain name, IP address, operating system and browser. This helps us to understand your use of this Website and enable the monitoring and improvement of the site to optimise your experience. If you would prefer to block cookies please refer to the instructions or help service on your internet browser. Please also refer to our [Cookie Policy](#).

### *Signing up for Gentrack "News and Views"*

If you subscribe to Gentrack's news and views, we will use your personal information to send you ongoing communications, including Gentrack's news and blog items. You will always be given the opportunity to opt-out of these communications via a link within each email.

### *Requesting Contact from Gentrack*

This Website includes a Contact Us option for all visitors (see [gentrack.com/contact-us](http://gentrack.com/contact-us)). By completing and submitting a Contact Us form, you are providing consent for Gentrack to use your personal information to respond to your enquiry and as otherwise set out in this Privacy Policy.

### *Applying for Gentrack Jobs*

If you are applying for a job, please follow the application guidelines provided in each of the roles advertised on this Website. By applying for a role via this Website and/or sending us your CV directly, you provide us with consent to use your information for the purpose of recruitment for Gentrack or our group entities. If you are not selected for employment we will keep your information in the case of other opportunities.

### *Third Party Websites*

When using our Website you may be directed to other sites that are beyond Gentrack's control and there are links to other sites outside our service. This includes the Partner Area. Gentrack is not responsible for and accepts no liability in relation to these sites and you should read the privacy policy statement of any new site you visit.

## **5 How we share your information**

Gentrack may share personal information with third parties, including:

- other entities in the Gentrack global group of companies;



- subcontractors, partners, agents and any person that we may use to operate our business and manage our business systems (for example, this may include database and mailing service providers (including email mailing service providers), marketing and e-commerce service providers, couriers and/or freight and transport service providers, outsourced administrative support, payment processing services, hosting providers, IT providers and other professional service providers as required from time to time, who will use such information in the course of providing services to us ;
- if you are a customer of a Gentrack Customer, we will disclose your personal information to the relevant Gentrack Customer (your service provider);
- if you are an employee of one of our corporate customers, retailers, contractors or suppliers, we may also disclose your personal information to your employer; and
- our professional advisors and agents.

We may disclose your personal information to these third parties so that they can assist us with providing the best possible service to you.

Those third parties will be permitted to access only the personal information they need to deliver the service to Gentrack or to you. Such third-party vendors have agreed to maintain the confidentiality and security of information Gentrack shares with them.

Job applicants please note that your data may be held on Gentrack's HR system (BambooHR) which is hosted by a third party based in the United Kingdom.

Gentrack is part of a global group of companies. We may disclose your personal information to other entities with the Gentrack group of companies or to other service providers that are located in New Zealand, Singapore, the United Kingdom, the European Economic Area (EEA), Switzerland, Israel and India. We are otherwise not likely to disclose information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law.

By providing your personal information to us, you consent to us providing your personal information to overseas recipients described above for the purposes set out in this Privacy Policy and you accept that Gentrack will not take reasonable steps to ensure those recipients comply with the Australian Privacy Principles.

The privacy and collection practices of entities to which we disclose personal information are governed by their own privacy policies and collection notices. When information is collected outside of Australia by entities in the Gentrack group of companies, those entities will comply with the Data Protection Policy accessible [here](#).

We will not otherwise disclose information about you unless:

- the disclosure is required or authorised by law; or
- you have consented to our disclosing the information about you.

## **6 Quality of your personal information**

Gentrack aims to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and update the information with us if it changes.



If you believe that the information we hold is inaccurate or incomplete, please contact us and we will use all reasonable efforts to correct the information. If we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is inaccurate, incomplete or out of date.

## **7 Security of your personal information**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the personal information we collect and hold.

## **8 Accessing and correcting your personal information**

You have a right to request access to, or the correction of, your personal information that we hold about you, subject to exceptions allowed by law. You may be required to put your request in writing for security reasons.

Gentrack will give you access to, or correct, your personal information unless there is a lawful reason for refusing your request for access or correction. If we refuse your request we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

## **9 Retention of personal information**

We will retain your personal information as required by law, and then take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed. Generally speaking, this means we will hold your personal information for as long as is necessary for the purpose for which it was collected.

## **10 Change in control of Gentrack**

If we sell or otherwise transfer part or the whole of (or control of) Gentrack or our business to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by Gentrack may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the business.

## **11 Changes to this Privacy Policy**

Gentrack reserves the right to make amendments to this Privacy Policy at any time for any reason. We will publish any updated Privacy Policy on our Website.

## **12 Complaints**

If you have a complaint about our collection, use or disclosure of your personal information, or you wish to make a complaint about a breach of our privacy obligations, including under the APPs, please contact us at the details set out below.

In your complaint, please set out the details of your complaint and your contact details. Our Privacy Officer will contact you to acknowledge your request and ask for any other applicable



information. Our Privacy Officer will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at [www.oaic.gov.au](http://www.oaic.gov.au).

### **13 Contact us**

If you have any questions, complaints or comments regarding this policy or our privacy practices, (or would like to stop receiving our communications altogether) please contact us by email at [info@gentrack.com](mailto:info@gentrack.com) or by post at Level 9, 390 St Kilda Road, Melbourne Victoria 3004.