
Privacy Policy



Group Privacy Policy for the Victoria Power Networks Group of Companies

Administrator: Michael Pliaskin	Document Owner: Andrew McKay
Document No: 03-20-CP0007	Issue Date: 03/06/2013
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About this Privacy Policy

This Privacy Policy is made available for the purpose of providing you with an understanding of how the Victoria Power Networks Group collects, uses and manages your personal information that it receives.

The Victoria Power Network Group of Companies includes CitiPower Pty Ltd (ACN 064 651 056), Powercor Australia Limited (ACN 064 651 109), Powercor Network Services Pty Ltd (ACN 123 230 240) and Energy Solutions Pty Ltd (ACN 610 914 059). This Privacy Policy has been adopted by each of these companies and each of their related bodies corporate.

This Privacy Policy deals with:

- The collection, use and disclosure of your personal information including sensitive personal information such as whether you have a dependence on a life support machine.
- The steps the Victoria Power Networks Group take to keep your personal information secure.
- How you can access or correct the personal information that we hold about you.
- Our complaints process and how best to contact us.

Collection of personal information

Customers

We collect certain types of personal information about our customers to allow us to deliver electricity services to those customers. The collection of this personal information also allows us to contact our customers in relation to their electricity supply when necessary. If this personal information is not provided we will be unable to provide certain electricity services those customers.

When a customer or a customer's electricity retailer, registered electrical contractor or other relevant party requests a service from us, we collect some or all of the following personal information about our customers:

- Your name, telephone number and email address
- Your postal address.
- The address at which our service is provided.
- Your meter data.
- Your credit card or payment details where you are making an electronic payment directly to us.
- The types of products and services that have been requested.
- Any other information reasonably necessary for us to provide our products and services to you.

In exceptional circumstances, we may also collect and maintain sensitive personal information about a customer. This information will only be collected from the customer (or third parties, such as health authorities, with the customer's consent), where a customer has special health needs requiring special electricity supply arrangements, such as a dependence on a dialysis machine or other life support equipment.

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In accordance with the [National Electricity Rules](#) we also collect meter data concerning the electricity consumption and load profile of customers connected to the CitiPower and Powercor distribution networks. We can also provide you with access to your meter data.

When you call us your telephone call may be recorded for quality, verification, security and compliance purposes. If you do not wish your call to be recorded, please advise us at the time of your call.

Recruitment and employment

If you apply for a job with us, we will collect some or all of the following personal information and health information from that applicant:

- Your name and contact details.
- The details in your employment application.
- A copy of Curriculum vitae and your employment history.
- Evidence of entitlement to work within Australia.
- Details of any relevant medical conditions.

If your application is successful and you are employed by us we may collect additional personal information and health information from you where it is necessary for us to do so. For example, we may collect health information about a person in the course of investigating a health and safety incident, when applying the Alcohol and Drug Policy or when a person discloses to us personal or health information in circumstances where their capacity to perform their role is affected.

GPS technology in equipment used by employees performing work on the electricity network may be activated and accessed by us to obtain information about employees' location in the field on Code Red days, Total Fire Ban days and Escalation Events. This information will not be used other than to locate employees for their health and safety, to allocate employees to the most appropriate location on Code Red days, Total Fire Ban days and Escalation Events, and will not be retained.

How we use your personal information

In general, we may use your personal information to:

- Identify our customers.
- Provide and improve services to our customers.
- Maintain services provided to our customers.
- Provide you with access to your meter data.
- Notify you about emergencies, outages, faults or interruption to supply of power.
- Keeping you informed about the products, services and special offers that we can offer that might be relevant to your power consumption. Unless you have asked us not to, we may use your personal information to promote and market our products and services to you. If at any time you would like us to not use your personal information for direct marketing activities please contact us via the details set out at the end of this policy.
- Respond to, investigate or resolve an enquiry or complaint.

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- Consider applications for employment.
- Comply with our legal obligations.

We may also use your personal information for management or statistical purposes. On these occasions we will use the data to analyse and examine trends and demographics to help us offer you improved services.

We will not use your personal information other than as set out above unless we have your express consent, or unless:

- You would reasonably expect us to use the personal information for that other purpose.
- There are reasonable grounds to believe that disclosure is necessary to prevent a threat to life or health.
- We suspect that unlawful activity is or has been engaged in and we will use the personal information or data to investigate the suspected unlawful activity.
- The use is authorised by law or reasonably necessary to enforce the law. These uses may include where we are required to provide information in response to subpoenas or warrants or other legal processes.

Disclosure of your information

We may disclose your personal information to:

- In the case of customers, our agents and contractors who we contract with to provide and improve services to you.
- In the case of potential employees, our psychometric testing service providers, medical providers, employment agency and recruitment suppliers, the Australian Department of Immigration and citizenship and our external recruitment database service provider.
- Our related bodies corporate.
- Any regulator or government authority or agency who has the right to access our records.
- Where you have provided us with your consent, to any other organisation or person.

Transfer of your personal information to other countries

We may disclose your personal information to some of our agents and contractors that reside outside Australia, namely, the United States of America, India, Japan and Portugal. We may also disclose your personal information to our parent companies that reside in Hong Kong for the purposes of internal audit reviews, business reporting and employee development and exchange opportunities.

In all instances we will take such steps as are reasonable in the circumstances to ensure that the overseas recipient of the personal information protects your personal information and only uses it for purposes set out in this Privacy Policy. If an overseas recipient is not subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles protect your information, we will take steps such as establishing contractual commitments from the overseas recipient as to the security and protection of your personal information.

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Protection of your personal information

We will take reasonable steps to ensure that information we collect, use or disclose is accurate, complete and up-to-date. We may store your personal information on computer databases and/or in hard copy and we will take those steps that are reasonable steps to ensure the safe security and privacy of your personal information.

Recruitment personal information and health information which is provided to us through our website will be stored electronically by our external recruitment database service provider.

We routinely test and review the information security measures that we have in place. We take reasonable steps to ensure your personal information is protected from unauthorised access, misuse, interference and loss.

We will continue to hold customer personal information while we supply electricity to you and otherwise for the periods required by law. Records of personal information no longer required will either be destroyed or permanently de-identified unless we are required by law to retain that information.

Your rights of access to your personal information we hold

You can request us to provide you with access to your personal information that we hold. We will comply with any request to access the personal information held to the extent required by law. There is no fee for making such a request; however we may charge you an administrative fee for providing this access. We will endeavour to respond to your request within 14 days.

You can access or correct the personal information you have provided to us by contacting our Privacy Officer using the contact details below.

If we correct the personal information you have provided us we will take reasonable steps to notify those corrections to any entity to whom we have disclosed the personal information unless it is impracticable or unlawful to do so.

Exceptions to the requirement for us to provide you with access to your personal information include:

- Where providing access will pose a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of an individual.
- Where the information relates to existing legal proceedings between us and you and the information would not be discoverable in the process of those legal proceedings.
- Where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of laws, or denying access is specifically authorised by law.

If we do not allow you to access your personal information, we will provide you with the reasons for our decision.

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Our complaints process

If you wish to make a complaint about the way we have handled your personal information, please contact our Privacy Officer using the contact details noted below.

We will endeavour to resolve your complaint at the first point of contact between you and our officer you have been engaging with. Where this cannot be achieved, we have an internal escalation process which you can request to access. This process has an objective to reach a mutually acceptable solution to your complaint.

We will endeavour to acknowledge receipt of your complaint within two working days. Our aim is to resolve your complaint within eight working days. Where we cannot reach a resolution within eight working days we will keep you informed of the progress being made with handling your complaint and provide you with a revised timeframe for resolving your complaint. At any time you may request to have your concerns escalated to our senior officers.

If after your discussions with one of our senior officers you remain dissatisfied you may refer your complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner via their website www.oaic.gov.au or via telephone on 1300 363 992.

You may also choose to refer your complaint to the Energy and Water Ombudsman Victoria, as outlined in our Customer Charter. You can access our Customer Charter via our website or via [this link](#). You can contact the Ombudsman via their website www.ewov.com.au or via telephone on 1800 500 509.

Relevant Legislation

The Victoria Power Networks Group are bound by the *Privacy Act 1988* (Cth), which contains the *Australian Privacy Principles* and the *Health Records Act 2001* (Vic) which contains very similar principles for health related information.

In addition, we are also bound by the *National Electricity Rules* and various determinations made by the Australian Energy Market Operator in relation how we may collect, use, keep, secure and disclose your electricity data.

We are committed to complying with our obligations under these acts and rules.

Our contact details

If you require more information about the way we manage personal information that we hold, or wish to request access to, or correction of, your personal information, please contact our Privacy Officer via any one of the following means:

Mail: 40 Market Street, Melbourne, VIC 3000
Telephone: For matters concerning the CitiPower Network, **13 12 80**
 For matters concerning the Powercor Network, **13 24 12**
E-mail: info@citipower.com.au

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