

# About this policy

This policy describes how SJH Communications handles your personal information. The term "SJH" refers to "SJH Communications". SJH does reserve the right to update its policy on customer data collection although we will respect a user's privacy at all times.

# Overview

SJH is committed to protecting personal information it handles and to comply with the guidelines of the Privacy Act 1988 (Privacy Act). This SJH Privacy Policy explains how we collect, hold, use and disclose personal information of individuals and business, explains your rights in relation to that personal information, even if you have not directly dealt with SJH. Personal information under the Privacy Act means information or opinion about an identified individual, or an individual who is reasonably identifiable (for example, the name, postal address, email address, and telephone number of an individual).

## Collection of Information

SJH only collects personal information where it is reasonably necessary for one or more of its functions or activities. If the relevant personal information is not collected, SJH may not be able to deliver services as intended as a telecommunications reseller, such as not being able to verify an individual or customer as an owner of a service.

Collecting the necessary personal information of a customer or a supplier allows SJH to conduct our day to day functions more securely. Depending on the nature of your services and association with SJH, we may collect different types of personal information about you, and in different ways. SJH may also collect personal information in the course of carrying out its day to day business and commercial activities. The type of information it collects largely depends on your dealings with SJH. If you have used the SJH website, communicated to us via a social media platform, ordered a service from us, requested assistance, reported a fault or submitted information through those websites we may collect and store information necessary to provide those services or communicate with you.

When you lodge an issue or enquiry with SJH about a telecommunications service, we may pass on the personal information that is necessary to an interconnecting provider to handle that issue or enquiry successfully. When communicating with you as a customer we may collect your personal information over the telephone (including through voice recording) or from documents and messages we receive. The personal information that may be collected by SJH would generally include:

- Your full name and address
- Contact details, which may include a daytime contact number, work or non-workplace contact details.
- Email address
- Service Address
- Details of the communication with you.
- Any documents, call evidence and other information relating to your service or enquiry, which could include bills, bank and credit card statements or information and authority forms.
- Mapping imagery, council plans and infrastructure information may also be obtained relevant to the delivery of services.



In the course of dealing with SJH you may provide other individuals' personal information to the us because it is necessary and relevant to your service or enquiry (for example, you may be an authorised representative of a business or residential premises, or you may believe it is necessary to provide details about other persons to necessitate service delivery). We generally confirm or disclose your personal information when transferring a service from one telecommunications provider to another.

As a telecommunication reseller we may be required to collect certain information as part of our work in the telecommunications industry and pass this information to government, law enforcement and regulatory bodies.

Where you are a contractor, a consultant, or a representative of an organisation or company that SJH has a business relationship with (for example, a vendor who supplies or may supply goods or services or products to SJH), SJH may collect the personal contact details of individuals that are the same as their business contact details. In most cases, SJH collects your personal information directly from you. However, there are some circumstances where this is not reasonable or practicable and where your personal information may be collected by SJH from other parties, such as when you have authorised a representative to act on your behalf. We may be given personal information about you on an authorisation form or from another telecommunications provider, such as correspondence between you and the provider.

### Use and Disclosure

On occasion, SJH may be contacted by persons who attempt to seek information about the progress of a service, enquiry or issue, which may include a request for personal information. These people may include legal and financial advisers, business colleagues, as well as spouses, partners or friends and family. Unless evidence of authority is provided, we do not discuss any matter with any person other than the customer, nominated representative or the telecommunications provider involved. SJH may use or disclose your personal information for the purpose for which it was collected only, and where:

- The use or disclosure is required or authorised by or under an Australian law or a court/tribunal order, or otherwise permitted under privacy laws.
- The use or disclosure is done with your express or implied consent.
- To effectively deliver, repair and maintain services and conduct our activities and to facilitate the provision of services.
- Improve the provision and quality of our services (including for internal auditing and training purposes).
- To carry out day-to-day business activities.
- SJH may disclose limited personal information to third parties, contractors and information technology
  providers for the purpose of improving its services. In such a case, SJH would take reasonable steps to
  de-identify information before it is disclosed.
- Improving compliance with the law and regulatory requirements.

Any third parties will be subject to privacy obligations.

SJH does not use personal information it collects for direct marketing (without prior permission) and will not disclose your personal information to third parties (such as other telecommunications providers) for direct marketing.



SJH will on occasion contact our customers and potential customers for the purpose of marketing and service awareness using information freely provided. If you wish to discuss a concern about being contacted by SJH you can contact SJH directly on (+61) 02 4044 2300.

If legally required, SJH may pass on relevant service information including personal information, to government agencies such as the Australian Communications & Media Authority (ACMA), the Australian Competition and Consumer Commission (ACCC), Commonwealth and State or Territory Government departments dealing with telecommunications or consumer affairs matters, and relevant industry bodies. If it is necessary that information about your complaint or your personal information should be provided to another body, we will gain your consent prior to disclosing any of your personal information.

Certain bodies, such as the police, courts of law and regulators such as the ACMA, ACCC and TIO have the legal authority to require SJH to supply complaint or other details that may include personal information. If this occurs, we will comply with the requirements and where possible, advise you that we have done so.

# How we store and hold personal information

SJH holds information physically (on and off premise), as well as in electronic databases and information systems (on and off premise, as well as in archives and databases hosted and managed by third parties). SJH takes such steps as are reasonable in the circumstances to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

# Access to, and correction of, personal information

Under the Privacy Act, you have the right (with some exceptions) to access the personal information about you that SJH may have collected and held. You also have the right to ask for your personal information to be corrected. Access to, and correction of, your personal information can be arranged by contacting SJH directly on (+61) 02 4044 2300 or using the contact details provided at the end of this document and asking for access or to make a correction.

We may choose to do this by adding additional information to your data record, rather than deleting any personal information that SJH holds about you.

Any complaints about issues that are covered by the SJH privacy policy can be made to SJH Communication Solutions at the following address:

The Manager SJH Communications 6/500 High St Maitland, NSW 2320

or Email: info@sjhcomms.com.au

You should first contact us about your privacy complaint, and give us a reasonable opportunity to resolve it, before approaching other bodies. If you are not satisfied with the outcome of a complaint about a potential breach by SJH of the Australian Privacy Principles or issues that are covered by the SJH privacy policy, you can contact the OAIC through its website <a href="http://www.oaic.gov.au">http://www.oaic.gov.au</a>.



# Privacy on the Internet

# Using our website

SJH respects your privacy and does not require or ask any visitor to subscribe or provide visitor information in order to access the SJH website. Any information IP, email, phone or address that may be collected or stored in providing this website or email address for a customer will not be sold, shared or given to any other merchant, company or other party without prior permission or notification in this privacy policy.

#### Website searches

Search terms that you enter when searching our website maybe collected but are not associated with any other information that we collect. We may use these search terms to identify key services that people are looking for on our site and to improve our website and services that we provide.

#### Links to other sites

The SJH website contains links to other sites. SJH is not responsible for the privacy compliance or the content of these other websites and the links are provided for general information.

#### User feedback

We may seek feedback from users on the SJH Communications website to improve the services and information offered. Answering feedback questions is voluntary. Any personal information provided through the feedback process will only be used for those purposes.

#### Internet security

If you are providing any information over the Internet that you wish to remain private, you should be aware that although all reasonable efforts are made to secure information transmitted using the SJH website, there is a possibility that information you submit could be observed by a third party while in transit.

If you would like to use another method to contact us or provide us with information, please telephone or mail us.