

SPRIGGY MOBILE PRIVACY POLICY

July 2024

V2

1. Introduction

Spriggy Mobile realises that your privacy is important, and we understand certain concerns customers might have about the security and use of their personal information. We are committed to upholding various legislature introduced to protect the privacy of Australian citizens, such as the Privacy Act 1988 and the Australian privacy Principles (APPs). In this privacy policy we outline how we collect, use, and protect your personal information.

2. What is personal information?

Personal information is information that may reasonably identify you. This can be any information or opinion that would let someone know who you are, and can include your name, date of birth, and address.

3. Collecting your personal information

3.1 Why we collect personal information

We collect personal information from you when it is reasonably necessary for business purposes, which, in our case, is to provide a service to you. We do not collect any information that would be considered unrelated to our business and the way it functions. The type of personal information we collect from you will depend on which service you request from us. In order for Spriggy Mobile to provide a better service, we may collect your personal information to:

- a) understand you, and how we can meet your needs now and in the future;
- b) develop or evaluate products,
- c) make ads more relevant to you, whether they are about our product or those of other companies;
- d) manage our business; or
- e) comply with legal obligations.

3.2 The type of information we collect

Spriggy Mobile collects personal information like your name, address, date of birth, gender, occupation, interests, location, contact details, payment details, financial information, and information about how and where you purchase our products.

There are a few different ways we collect this information.

3.3 What we collect straight from you

We collect most personal information directly from you. For example, you might fill out a form online or give it to one of our representatives over the phone.

You may choose to not provide your personal information to us, opting instead to deal with us anonymously. If this happens, we may not be able to provide you with the product you've

asked for or give you the level of service you expect, as a certain level of personal information is required to receive certain services.

3.4 What we collect while you are a customer

We also collect personal information during your relationship with us. For example, we may collect personal information:

- a) when you pay your bill or purchase products;
- b) when you use our products, applications, or self-service channels; or
- c) when you join or use our rewards programs.

3.5 What we collect from your online activity

Spriggy Mobile's website uses cookies and other digital identifiers in order to track the activity of visitors. Depending on which aspects of the website you visited and used we will collect certain information about your visit. This can include:

- a) the time and date of your visit;
- b) which pages you viewed and how you navigated these pages;
- c) which type of device you used to visit;
- d) the details of your internet provider;
- e) from where you were referred to our website;
- f) your IP address; and
- g) information on your location.

Upon visiting our website, we will attach a "cookie" to your computer's memory. A cookie is a small data file which contains information for record keeping purposes. Most web browsers such as Google Chrome and Safari are automatically set to accept cookies. If you'd like to disable the use of cookies you can do so in your respective browser's settings.

Cookies provide us with information on how customers use our website. This information is anonymous, and we do not store any personal information that may identify you inside of these cookies.

We also use Google Analytics to record information about the amount and types of visitors that may visit our website online. We, and affiliated third parties, use cookies such as the Google Analytics cookie and DoubleClick cookies to inform us on the browsing behaviour of website users, and this helps us optimise our website and serve ads based on this behaviour. You can opt out of Google Analytics data collection by using the Google Ads Preferences Manager.

Alternatively, you can use the Google Analytics opt-out browser add-on to prevent the sending of any information about your website visit to Google Analytics.

3.6 What we collect from others

Other people might give us personal information about you. For example, we might be given personal information by your employer if you use our services for business purposes, or by your parent or guardian if you are under the age of 18.

We may also collect personal information from other companies that are legally able to disclose it to us if it is not practical to collect it from you. For example, we buy or obtain personal information from trusted sources to help us identify people who might be interested in hearing about our products.

We will always take reasonable steps to make sure that you are aware we have collected your personal information, including how we obtained it, and how we will handle it.

4. Use and disclosure of your personal information

We will only use or disclose your personal information for business purposes in a manner that complies with the various laws and legislation that are in place to protect your privacy.

For example, we may collect, use, and disclose your personal information to or from:

- a) credit reporting agencies or credit providers;
- b) emergency services and law enforcement agencies; or
- c) third party companies we work with to offer products.

4.1 Third parties we work with

We work with third parties to provide some types of sales, business, and customer support. We may also contract third parties to manage certain aspects of our business such as data storage, mailing, IT services, marketing, billing, and auditing. These third parties may have access to systems that include your personal information. However, they are subject to strict controls that protect your information from unauthorised use or disclosure, and limit their access to your personal information to the extent necessary for them to do their job.

Some of the parties mentioned above are located overseas, but just like third parties in Australia, we will only provide them with secure access to the personal information which is necessary for them to do their job. Some of these third parties have servers located in the United States and the Asia Pacific.

4.2 Emergency services and law enforcement legal obligations

We give access to personal information where we are permitted or obliged to do so by Australian law. For example, in some circumstances we will use or disclose personal information to react to unlawful activity, serious misconduct, or to reduce or prevent a serious threat to life, health, or safety. We are obliged to cooperate with law enforcement bodies in some circumstances. We may disclose personal information, including information about phone calls and service use, when we receive an access request or warrant that is authorised under Australian law.

We give information about some of our telephone products to the Integrated Public Number Database, where it is used for a number of authorised purposes including the listing of phone numbers in directories and the dispatch of emergency services. We may also provide your geolocation information directly to emergency services when you call them using our service.

4.3 Your credit situation

We collect some types of personal information to assess your credit situation when you apply for our services. For more details, please see section 7 of this document.

5. Protecting your personal information

We are committed to protecting your personal information, which may be stored in either hard copy or electronic format.

We will take reasonable steps to ensure the security of your information where it is stored in our own storage facilities or servers.

Some of the security measures we use include:

- a) multi-factor identity authentication to prevent fraudulent activity on your account;
- b) firewalls and access logging tools that protect against unauthorized access to your data and our network;
- c) secure work environments and workflow systems that prevent the unauthorised access and copying of your personal information;
- d) secure server and closed network environments;
- e) encryption of data in transit and at rest;
- f) virus and malware scanning tools;
- g) management of access privileges to ensure that only those who really need it can see your personal information; and
- h) ongoing training and security reviews.

These measures are robust, but security risks do change. We will remain vigilant in our efforts to protect your personal information.

5.1 Sensitive personal information

When we talk about sensitive information, we mean details about your race, ethnicity, politics, religious or philosophical beliefs, sexual preferences, health, genetics, or criminal record. We do not need sensitive information about you as it is none of our business.

There may be times when you choose to tell us about your health and we might collect biometric information for use with new technologies like voice or fingerprint recognition. This could happen as technology changes and evolves over time.

Remember, this kind of information will only be collected with your permission, and we will only use it for the purpose for which you provided it.

5.2 Outstanding payments

In some circumstances, we may need to refer or sell overdue debts to debt collectors or other companies. If we do this, we'll give them secure access to the personal information they need to handle the debt.

We may also update credit reporting agencies about some types of payment defaults, although we'll always tell you before we do this.

5.3 Multi-factor Authentication

In order to prevent fraudulent activity on your account Spriggy Mobile employs a multi-factor authentication system. This means that when you contact us, we will need to verify that you are the owner or authorised representatives of the account by sending you an SMS or email message containing a verification code or verification link. You will need to complete this multi-factor authentication process if you wish to take any high-risk actions on your account. High-risk actions can include:

- making any changes to your telephone service which might affect its delivery to you;
- disclosing personal information on the account to you;
- adding or removing an authorised person on the account;
- purchasing new services; and
- activating premium services.

6. Advertising

Everyone hates being bombarded with ads for things they don't need or have any interest in. Spriggy Mobile may use your personal information or engage third parties who collected information about you from publicly available sources, to deliver advertising that is customised or more relevant to your interests, characteristics, or general location. This doesn't necessarily mean you'll get more advertising. It just means that the advertising that you see will hopefully be more relevant to you.

6.1 Advertising Spriggy Mobile products

Spriggy Mobile advertises by mail, phone, email, text, and online via internet.

6.2 Advertising other products

We may work with other companies to advertise their products online. We don't give them access to your personal information when we do this. Instead, we work with them to understand the type of audience they want to advertise to and deliver the ad for them.

6.3 Opting out

We'll make sure that any marketing emails, texts, and letters we send you clearly tell you how to opt out. Alternatively, you can also opt out by emailing us at support@spriggymobile.com.au or by calling us on 1300 640 918.

When you opt out, you can choose to opt out of a particular direct marketing method or all direct marketing. Of course, there are some types of marketing we can't control on an individual basis, like general letterbox drops or online ads that are not targeted specifically to you.

7. How to access your personal information

If you ask us, we will usually give you access to the personal information we hold about you. We will always confirm your identity before providing access to your personal information.

You can ask for access by calling us on 1300 640 918. It will really help if you tell us exactly what you're looking for.

There are circumstances under Australian privacy laws where we may not give you access to the personal information we hold about you. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health, or safety.

There is generally no cost for accessing the personal information we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable, and we will let you know what it is going to be so that you can agree to it before we go ahead.

8. Quality of personal information

We aim to keep the personal information we hold about you accurate, up-to-date, and complete. If you think our records need to be corrected, please call us on 1300 640 918.

We encourage you to update your details with us so we can deliver better service to you, and so the others we work with (like emergency services) have access to the information they need to do their job.

9. Getting in touch

We recognise that your personal information is important to you, so please let us know if you have any questions or concerns about this policy or our practices.

Spriggy Mobile phone support is available during the following hours by using the webchat function available on the Spriggy app, by calling 1300 640 918 or emailing support@spriggymobile.com.au :

Alternatively, you can contact us via post at PO Box R1960, Royal Exchange NSW 1225. Please note, our standard operating times are:

- Monday – Friday: 09:00 (9 AM) – 20:00 (8 PM) AEST
- Weekends and NSW public holidays: 10:00 (10 AM) – 18:00 (6 PM) AEST

If you are making a complaint regarding privacy please send an email to complaints@spriggymobile.com.au .

We will try to investigate and respond to any complaints regarding your privacy within 30 days. If you are unhappy with the outcome of our complaint resolution process, you can lodge a complaint with the Telecommunications Industry Ombudsman by visiting <https://www.tio.com.au> or with the Office of the Australian Information Commissioner.