

## **Positive Life Group – Privacy Policy**

Positive Life Group, operated under Positive Life Group Pty Ltd ACN 616 059 646 and its related bodies corporate (Positive Life Comparison) are committed to complying with applicable privacy laws in relation to the personal information that we collect in the course of running our business.

Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

Please take a moment to read this Privacy Policy as it explains how we manage personal information including our obligations and your rights in respect of our dealings with your personal information.

### **Key definitions**

- In this document:
- “APPs” means the Australia Privacy Principles set out in the Privacy Act;
- “Personal information” has the meaning set out in the Privacy Act, and (in summary) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or otherwise;
- “Privacy Act” means the Privacy Act 1988 (Cth);
- PLG means Positive Life Group
- “Sensitive information” has the meaning set out in the Privacy Act, and includes certain specific types of personal information such as health information, and information about a person’s racial or ethnic origin, sexual orientation, religious beliefs or affiliations and criminal record.

One of the primary ways that we collect and handle personal information is through the PLG website, which is available at our website located at [www.positivelifegroup.com](http://www.positivelifegroup.com) (the Website). We also collect information through our partner websites including, [www.econnex.com.au](http://www.econnex.com.au) (Partner Websites

### **1. The right to be forgotten & data deletion**

If you are a user of the Positive Life Group website and have provided your information to us after registering as a customer, you have the right to request your data be deleted from the website. In order to do this, please email us at [admin@positivelifegroup.com](mailto:admin@positivelifegroup.com)

Once you have submitted your data deletion request, we will respond to you within 3 business days, giving you confirmation that your data has been deleted.

## **2. How we collect your personal information**

We will collect and hold your personal information in a fair and lawful manner. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

1. when you register with and use the PLG website or any of our Partner Websites, or otherwise use the Website;
2. in administering and performing any contracts with service providers;
3. when you contact us via telephone or other means;
4. from correspondence (whether in writing or electronically);
5. while conducting customer satisfaction and market research surveys;
6. when administering any of our services; and
7. as otherwise required to manage our business.

However, in certain cases we may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, your employers, contractors, our clients, business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

## **3. Types of personal information we collect**

The type of personal information we may collect can include (but is not limited to) your name, postal address, current address, email address, phone numbers, date of birth.

Depending on the nature of our relationship with you, we may also collect information including credit card details, bank details, drivers licence, billing information, current and former employment details.

If you register an account on the PLG website or any of the Partner Websites, the types of personal information that we collect about you will depend on what type of account you register. For example:

If you are a registered member, we will collect information that you provide us about the types of energy plans you may be interested in as well as information about how you use the Website and interact with our products and services.

We will also collect any information that you provide us to complete your user profile for the PLG website. This information will be displayed as part of your user profile on the website and may be shared with PLG and our other Partner Websites.

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

#### **4. Our purposes for handling your personal information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

1. confirm your identity;
2. operate the PLG website, which allows you to use the services within the PLG website;
3. offer and provide you with our goods and services;
4. send you PLG newsletters, offers for our products and services (and products and services of our trusted partners) and notifications to which you have subscribed;
5. manage and administer those goods and services, including account keeping procedures;
6. optimise and customise the user experience (including content and advertising) for users of the PLG website and our other websites and services;
7. protect the security and integrity of the PLG website and our other website and services;

8. develop and improve the PLG website and our other products and services;
9. to produce and commercialise datasets and data reports, as described in the Terms of Use;
10. communicate with you, including (but not limited to) emailing you tax invoices;
11. comply with our legal and regulatory obligations; and
12. otherwise to manage and develop our business, including rewarding a PLG website.

## **5. Who we disclose your personal information to**

The types of persons, agencies and entities we typically disclose personal information to include (but are not limited to) our suppliers, contractors (such as any mail house), trusted partners who offer products and services that we think you may be interested in (such as financial advisors, insurance providers, property services and utility providers), organisations that provide us with technical and support services (these include third party technology service providers to assist us with storing and processing user data as part of the website's operations) and our professional advisors.

We may share your information with your representative or any person acting on your behalf.

Further, PLG often works cooperatively with its related bodies corporate within the PLG group, and may disclose your personal information to these entities. We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

## **6. Protection of personal information**

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

We use a range of security measures to protect the personal information we hold, including by implementing IT security tools to protect our electronic databases and ensuring that employees and third parties with access to records containing personal information are subject to appropriate information security obligations.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

## **7. Direct marketing**

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with customers and let them know about new offers and opportunities. We may provide you with information about products, services and promotions either from us, or from third parties which may be of interest to you.

You may opt out at any time if you no longer wish to receive direct marketing messages from us. You can make this request by contacting our Privacy Officer.

## **8. Cookies**

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

We may use third party vendors to show our ads on sites on the Internet and serve these ads based on a user's prior visits to our Website. We may also use analytics data supplied by these vendors to inform and optimise our ad campaigns based on your prior visits to our Website.

Without limiting the above, we may also use the cookies on the website (as well as data collected through these cookies) for other commercial purposes, including targeting and displaying advertising on the Website and on third party websites, social media platforms and advertising networks.

## **9. Accessing and correcting your personal information**

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

## **10. Overseas transfers of personal information**

We may disclose your personal information to our related entities, service providers and agents located overseas, including in, India. From time to time we may also engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business, and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able to seek redress under, the Privacy Act.

## 11. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer  
Positive Life Group  
Level 15, 350 Queen Street, Melbourne, Victoria, 3000, Australia.  
Telephone 1300 717 450

Email : [admin@positivelifegroup.com](mailto:admin@positivelifegroup.com)

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner  
GPO Box 5218, Sydney NSW 2001  
Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 12. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you.

