



Privacy Policy

At Telarus we like to dedicate ourselves to the highest quality of customer service, and this means protecting privacy as best we can. To that end, we would like to be upfront about the kinds of information that we collect from our customers and how we plan on using that information.

So who exactly is Telarus and what do you do?

Telarus is a business unit within a group of companies that are dedicated to providing high quality telecommunications and IT solutions, and which are wholly owned subsidiaries of Over the Wire Holdings Limited (ASX:OTW). This privacy policy applies to each company in the group.

And where do we get in touch with you?

Email is the quickest and easiest way for most people to communicate, and so if you want to get in touch and provide any feedback that you may have, you can reach us at privacy@overthewire.com.au.

Our postal address is GPO Box 1807, Brisbane, QLD, 4000

Our Head Office is located at Level 21, 71 Eagle St, Brisbane, Queensland, 4000

What kinds of information are we talking about here? Is it personal?

For the most part, Telarus sells telecommunications and IT solutions to businesses and we collect information about businesses, but because businesses are collections of individuals it would be almost impossible for us to provide a high quality service without collecting some personal information about individuals.

In general terms we collect identification information, contact details, bank or credit details for payments as well as general information about the business our customers are engaged in, how they use our service, and how the service may be used in the future. For customers who require unattended access to facilities equipped with biometric locks, we will need to collect biometric information. Everyone attending any of our premises should be aware that their image may be captured by video surveillance.

I'm going to need you to be a lot more specific

Okay, pretty common examples of the kinds of information we may collect include:

- ABNs & ACNs
- Phone Numbers (including mobiles or direct lines and extensions for some people)
- Physical, postal and registered addresses
- Email Addresses
- IP addresses
- Credit history information (including personal credit history of directors)

- Debit or Credit Card information (including personal debit or credit card information of directors)
- Bank account details (including personal bank details of directors)
- Biometric information such as fingerprints (only if you require access unescorted access to premises secured by way of fingerprint scanner or other biometric security)
- Your image (only if you attend our premises)
- General information about the business including:
 - Size of the business
 - The relevant industries the business is involved in
 - Whether the business has any related entities
 - The structure of the business
 - Operational information
- General information about the kinds of services the business uses including:
 - Purchasing history and patterns
 - Service history
 - Details of any active services, how and where they are used (which may include whether certain people use the service more or less than others)
 - Website traffic analysis data

And how are you planning on getting that information?

We collect information in a number of ways, most often, by straight up asking our customers or their employees directly (for example over the phone or by filling in our order forms). In addition to this, we may consult our own records for information or collect information from other companies in the group.

In some cases we use automatic analytics tools, such as those on our Websites to collect some types of information. For more information about these, see “Website Analytics” below.

At times we may also collect information from publicly available sources or via a third party such as a Credit Rating Agency or some other third party that helps us provide services.

Telarus also operates a partner network of resellers and referrers. These companies (often other smaller systems integrators or ISPs) will refer customers to us if they feel a more complex solution may fit their needs. Resellers will purchase services on behalf of their customers, however will share all the relevant information about their customers needed to deliver the service.

And where do you store that information?

We take steps to ensure that your personal information is stored safely to protect it from interference, misuse, loss and unauthorised access, modification or disclosure. These steps include electronic and physical security measures.

Most information that you give to us is linked to records we store in either our helpdesk or customer record management (**CRM**) systems. Typically these records are stored in applications hosted by us in our own data centres however in some cases the applications we use are hosted by third parties, and some of those third parties may be based overseas. Information stored in those applications is not disclosed to the third party provider and is encrypted in such a way that only we are able to access it.

So what are you doing with this information?

The information we collect is primarily information that we need to provide you with the services that we offer and ensure you’re getting a service that meets your needs. In some

cases we will use your data for marketing purposes (for example by promoting services to you that we consider may meet your needs). Your data may be used more generally to help us develop and improve the services we offer, or the business processes we use to deliver those services.

Again, I'm going to need more specifics.

No problem. Generally the kinds of things we are doing with this information include:

- Verifying the identity of people who purchase and are authorised to make changes to services
- Delivering our services to you quickly and efficiently
- Administering the services as you continue to use them. (This includes making sure any maintenance is promptly carried out, issuing invoices and bills, and following up on unpaid invoices.)
- Communicating with you. (eg; About scheduled outages, network faults or changes in policy)
- Quality Checking our products
- Aggregating information to identify trends, shortcomings or areas for improvement so that we can develop and improve our product offerings and business processes
- Checking credit ratings to ensure that we are providing credit responsibly
- Preventing fraud
- Ensuring the service we offer is meeting our individual customers' needs
- Using it for security purposes
- Directly marketing either services or special offers to your products offered by us, our referrers, agents, and members of our corporate group, and our business partners, where we think the offers will be of interest to you, using:
 - post
 - email
 - electronic messaging
 - social media
 - targeted web content
 - other direct marketing channels.

Direct marketing may continue until you opt-out by contacting us even if you are no longer our customer.

What about sharing the information with other people?

We may need to share the information we collect with organisations outside Telarus in order to comply with the law, to deliver services to our customers or to properly administer our business.

- The sorts of third parties we're talking about here are: Credit and Fraud checking agencies
- Providers of credit (for credit related purposes.)
- Any related company
- Any of our professional advisors (including accountants and lawyers)
- Other telecommunications or information service providers (for example for technical reasons.)
- The Integrated Public Number Database manager. For more information on this see the relevant section below.
- Organisations that help us manage and design business or corporate strategies, for example those involved in the sale of part of our assets or business (including

accounts and trade receivables) and those involved in managing corporate risk and funding functions (eg; Securitisation)

We may also disclose information to those who are authorised representatives on your account.

What we will not do, is sell the information we collect to someone else, or aggregate our data with theirs for their own purposes.

So when you say ‘administer your business’ what do you mean, exactly?

What, exactly, we mean might vary. But generally the kinds of functions that we might engage external organisations to either carry out or to assist us with are:

- Responding to customer enquiries
- Mailing and shipping operations
- Billing and debt recovery
- IT or telecommunication services
- Installation, maintenance or repair
- Marketing or advertising
- Website traffic analysis

Could I see the information you’re keeping about me?

Yes, we’d be happy to show you the records we keep that contain your information. For security reasons though, we may need to have these kinds of requests in writing. Please send these requests to the contact details above.

We might also have to charge a fee for searching, compiling and providing access to the information in an appropriate form.

Some of your information about me is wrong!

We don’t like being wrong, in fact we try to make sure all the information we have is complete, correct and up-to-date. Help us out by letting us know if we’re getting it wrong and we’ll change it. Just contact us on the details above.

Please keep us updated when your details change so we can update our records appropriately.

I believe Telarus has failed to comply with Privacy Laws and wish to make a complaint!

Please let us know using the contact details above, so we can investigate the complaint and respond to your concerns.

If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Information Commissioner. To lodge a complaint, visit the ‘Complaints’ section of the Information Commissioner’s website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner’s office.

Can I sign up for services anonymously or under a Pseudonym?

Due to the nature of the service we provide which is typically tied to a physical address and telecommunications legislation which requires registration of telephone numbers with the Integrated Public Number Database Manager we would consider it to be either impractical, impossible or possibly even illegal to allow end users to register for a service either anonymously or under a pseudonym.

What's the Integrated Public Number Database and why are you sharing my information with them?

The Integrated Public Number Database or IPND is a national database of every public telephone number in Australia. Regardless of whether a number is listed or unlisted, we are required by law to keep the IPND up to date with details about every telephone service we sell including the subscribers name and address. The IPND is used to help manage Emergency Calls (ie Triple Zero calls) and to provide information to emergency services and law enforcement.

For similar reasons every call you place carries Calling Line Identification Data or 'CLI Data' which is passed from us to other telecommunications carriers to help place the call. This information contains your phone number and may also be available to any party that you call – depending on whether their telecommunications provider supports Calling Number Display.

Even if you have Calling Number Display Blocking enabled – CLI data is still carried on the call and certain kinds of recipients will always be able to see this data (Such as Emergency Services.)

You mentioned something about 'website analytics'- what's that about?

Like most major websites, we monitor site traffic and analyse how visitors make use of the site in order to improve our website designs. The primary service we use to do this is provided by Google Inc in the United States and works by using "cookies", a standard for small text files which are temporarily stored on your computer.

These cookies gather information about the computer or device you use to access the site, as well as your internet use patterns more generally (including your IP address) and transmit that data to Google Servers. Google does not associate this information with your IP address, and we use the data in an aggregated deidentified form for our purposes.

For more on how Google handles privacy visit <https://www.google.com/policies/privacy/> or to opt out of Google Analytics you can either disable cookies in your browser or visit <https://tools.google.com/dlpage/gaoptout>

In addition to Google's analytics software, we use Google AdWords Remarketing to display relevant ads tailored to you based on those pages that you have viewed on the Telarus website by placing a cookie on your machine. This cookie does not in any way identify you or give access to your computer. Google AdWords Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

- If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting [Google's Ads Preferences Manager](#)
- Google has additional information available about their [Remarketing Privacy Guidelines, and Restrictions.](#)
- You can also opt out of any third-party vendor's use of cookies by visiting <http://www.networkadvertising.org/choices/>

Other information which we may capture when you visit our website includes your IP address and the duration, date and time of your visit.

I want to know more

If you have any further questions about this Privacy Policy or the way we handle your personal information, please contact us on the details above.

For more information about privacy in general, you can visit the Office of the Information Commissioner's website at www.oaic.gov.au.