

Policy ORG-COC-POL-002





This policy outlines the methods which Origin directors and employees are required to use to define and manage private and confidential information.

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1. Commitment and purpose

The privacy of your personal information is a priority to us at Origin Energy Limited (Origin). That's why each part of our business is committed to complying with laws that protect your personal information, including the National Privacy Principles set out in the Privacy Act.

This Privacy Policy explains how we collect and handle your personal information. It also describes generally the types of personal information we hold, how it is collected, held, used and disclosed and our purpose in doing so.

2. Why do we collect personal information and what information do we collect?

We have set this Policy out in separate sections under *Customers & Potential Customers*, *Shareholders* and *Employment*. Each section describes how Origin's Privacy Policy applies to you in the ways that you interact with us because the type of personal information we collect varies depending on whether you are a customer, supplier, shareholder or in some other capacity.

We collect personal information for a range of purposes, including:

- to provide you with a product or service;
- to conduct credit checks and assess credit worthiness;
- to conduct research and development;
- to manage our relationship with you, either as customer, shareholder or other stakeholder;
- to comply with our legal and regulatory obligations; and
- for other purposes required or authorised by law, including purposes for which you have provided your consent.

If we are not able to collect your personal information, we may not be able to do business with you.

3. Customers & Potential Customers

3.1 Customer information

As a customer or potential customer, we may collect your name, current and previous addresses, date of birth, telephone number, email address, credit history, concession or discount entitlements and information about the services provided to you (such as metering data and payment details). In some circumstances, we may also collect sensitive information about you (for example, if life support equipment is used at your supply address).

We may also collect details of other interactions that you have with us, together with any other information that you choose to provide us with.

If you provide us with personal information about another person (such as an additional account holder), we will ask you to also tell that person about this Privacy Policy.



3.2 Using your personal information

As a customer, we may use your personal information:

- for marketing purposes where we have your express or implied consent. If you do not wish to receive our product and service offers, we will not contact you about these offers once you have advised us as such; and
- to conduct a credit assessment of you and use information we are permitted by law to use to establish or report on your creditworthiness.

3.3 When do we disclose personal information to third parties?

In line with modern business practices common to most companies and to meet your specific needs, we may disclose your personal information to third parties. Some of these third parties act on our behalf, and if this is the case we ask that these third parties hold, use and disclose your personal information in accordance with the Privacy Act. These third parties may include:

- additional account holders or your authorised representative;
- other energy retailers, if you decide to move to another retailer;
- companies that manage the distribution of your energy;
- financial institutions for payment processing;
- credit reporting agencies and credit providers;
- government and regulatory authorities, where required or authorised by law;
- other service providers, which may include:
 - website development, information technology and security providers;
 - meter reading, connection and repair providers;
 - billing and debt collection agencies;
 - o database management and data processing analysts;
 - creative, promotional and market research agencies;
 - telemarketing and door-knocking service providers;
 - mailing houses, freight and courier service providers; and
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In the case of our contracted service providers, we may disclose personal information to the contracted service provider and the contracted service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services. Your personal information may be transferred overseas for these purposes.

We do not sell, rent or trade our customers', shareholders' or other stakeholders' personal information to or with third parties.

4. Shareholders

If you are a shareholder, the Corporations Act requires us to collect information about your name, address and shareholding and include these in our share register, held by Link Market Services Limited (Link). This information will continue to be included in the register for seven years after you cease to be a shareholder.

The Corporations Act also requires us to grant access to anyone to inspect our share register on request and under certain circumstances, to obtain a copy. We may provide information from the share register to meet specific requests, such as identifying the top 20



shareholders. Shareholder information will not be knowingly disclosed for purposes other than those which we consider to be in the best interests of the shareholders.

As shareholders, you may also be required to provide us with your tax file number or financial institution account details. We ask for your bank account details to make dividend and other payments to you in accordance with our Mandatory Direct Credit Policy. In compliance with Australian tax laws, we also provide certain advice to the Australian Tax Office, including dividend information.

Under the Money Laundering and Counter Terrorism Financing Act 2006 (Cth), our share registry may collect personal information about you (such as your legal name and other names you may be known by, your residential street address and your date of birth) and hold other documents in order to verify your identity. This information is generally not included in the public register and is restricted to authorised share register employees, Origin, and regulators.

You may access a copy of Link's privacy policy here.

5. Employment

5.1 Job applicants

If you are applying for a position with us, we will ask you to provide specific personal information, such as your name, email address, telephone number, qualifications and career history. We may also ask you for other information such as your interests and the positions you are interested in.

Any personal information you provide Origin in connection with a job application may be used to consider you for current and future employment and may be disclosed to our external advisors to assist us in the selection and recruitment process.

5.2 Employees

If you are an employee of Origin, we will collect employee records and personnel files, referee reports and other information. The handling of your personal information as an employee is exempt from the Privacy Act if it is directly related to your current or former employment relationship or an employee record relating to you. We will not disclose your personal information for any other purpose, other than required by law.

6. Collection of information

6.1 How do we collect personal information?

We may collect personal information in a number of ways, including:

- directly from you, including through our website, by telephone, through written correspondence (such as letters and emails), and in person if you visit our share registry, one of our customer service centres or receive a call from a door-to-door sales representative;
- from additional account holders on your account, your joint shareholder or your authorised representative;
- from other energy retailers, if you move to us from that retailer;
- from credit reporting agencies and from the third parties;
- from publicly available sources of information, such as address validation software and telephone directories; and
- monitoring and recording calls that you make to us in certain circumstances (we will notify you beforehand).

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6.2 Information collected through our website

Some of the information that may be collected by Origin during your visit to our website is not personal information, because it does not reveal your identity. For example, we may record your server address, the date and time of your visit, the pages you viewed, any documents you downloaded and the type of browser and operating system you used.

If collected, this information will be used and disclosed by us in anonymous, aggregated form only, for purposes including statistical and web site development. However, we reserve our right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

7. Quality and security of personal information

As you can see, we rely on the personal information we receive and hold to conduct our business. We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. You can help us by letting us know about any changes to your personal information, such as your email address or phone number.

We store information in different ways, including in hardcopy and electronic form. We have implemented controls around technology and our organisational processes to assist us in protecting your personal information. This includes having in place confidentiality requirements for our employees, document storage security policies, systems and site access restrictions and requiring third parties to satisfy identification requirements.

We expect all our employees and contractors to comply with the Privacy Act and our Privacy Policy, and will take appropriate actions to address breaches by employees and contractors of the obligations imposed by the Privacy Act and the Policy. However we do not accept responsibility for the misuse of personal information by third parties.

Our websites also have electronic security systems in place, including the use of firewalls and data encryption. We also take care to store personal information in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. Details of website security are provided in our <u>Terms of Use</u>.

However, no data transmission over the internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect users' personal information, we cannot guarantee or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once we receive your information, we make every effort to ensure its security on our systems. If you are concerned about sending your information over the internet, you can contact us by telephone, email or post.

8. Access and correction

Please contact us if you would like to access or correct the personal information that we hold about you. We will generally provide access or make corrections, subject to some exceptions permitted by law. We may charge a fee to cover our costs of providing access to you.

We may need to refuse to grant you access to your personal information under some circumstances prescribed by the Privacy Act (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals).

Our contact details are available at <u>http://www.originenergy.com.au/4/Customers</u>.