PRIVACY POLICY

UCOM Telecom Pty Ltd ACN 679 170 373

Last Updated: 27 January 2026

1. About This Policy

(a) This is UCOM's Privacy Policy (Privacy Policy). In this Policy a reference to 'UCOM' or 'we' or 'us' or 'our' means UCOM Telecom Pty Ltd (ACN 679 170 373) and its related bodies corporate within the meaning of the Corporations Act 2001 (Cth).

(b) At UCOM, the protection of your personal information is a priority for us. Our Privacy Policy outlines how we collect, use, store and protect your information.

2. Privacy Laws That Apply to Us

(a) We are required to comply with the Privacy Act 1988 (Cth) and are bound by the Australian Privacy Principles ('APPs') set out in that Act. The APPs establish minimum standards for the collection, use, disclosure and handling of personal information. They apply to personal information in any form, including written, verbal and digital form. The APPs can be accessed at the website of the office of the Australian Information Commissioner: www.oaic.gov.au

(b) We are also subject to other laws relating to the protection of personal information. Where we:

i. provide telecommunications carriage services, we are subject to privacy obligations under the Telecommunications Act 1997 (Cth);

ii. undertake direct marketing activities, we must also comply with the Do Not Call Register Act 2006 (Cth) and the Spam Act 2003 (Cth).

(c) In this Privacy Policy, unless the context otherwise requires:

i. 'Privacy Law' refers to any legislative or other legal requirement that applies to our collection, use, disclosure or handling of personal information.

ii. 'Personal Information' means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not. Personal information includes sensitive information.

iii. 'Sensitive Information' has the meaning given in section 6 of the Privacy Act 1988 (Cth), and includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, and biometric information.

3. Whose Personal Information Do We Collect?

We collect personal information about individuals who are our:

(a) Prospective Customers: this includes people we think may be interested in our products and services as well as people who have expressed interest in obtaining or learning more about those products and services, and people who visit our webpages;

(b) Current Customers: this includes people who purchase our products or services or who hold an account with us; and

(c) Past Customers: these are people who have purchased our products or services but do not currently have an active account with us.

(d) We will refer to these individuals collectively as 'Customers'.

4. What Personal Information Do We Collect?

(a) The personal information we collect will depend upon the nature of our Customers' interactions with us. The personal information may include:

i. name, date of birth, email address, telephone number(s) and residential address. For corporate and business customers, we may collect information about nominated contacts, including name and title or position, date of birth, telephone number(s) and email and business addresses;

ii. purchasing patterns, consumer preferences and attitudes for marketing purposes, including to analyse markets, develop marketing strategies and to identify and develop products and services that may be of interest to its customers;

iii. payment details (such as credit card or debit card details) provided when purchasing our products and services.

(b) When you become, or apply to become, a Current Customer, we collect a range of other information in order to assess your application and manage your account(s). This includes:

i. Proof of identity information, including passport number, driver licence number, Medicare number or other government identifiers. We need this information to ensure you are who you say you are, and to keep our customer records accurate and up-to-date. We may also be required to obtain proof of identity information by law. For example, the Telecommunications Act 1997 requires us to obtain specified proof of identity information before providing mobile telephone services.

ii. Financial and credit information, including credit history, employment history, remuneration details, bank account and credit card information, information about assets and income and details of relevant court judgments and bankruptcies. We need this information to assess creditworthiness and financial suitability of Prospective Customers and to manage accounts of Current Customers. We handle credit information in accordance with Part IIIA of the Privacy Act 1988 (Cth) and the Privacy (Credit Reporting) Code 2014.

iii. Information relating to occupancy. We may need information to establish a customer's right to occupy the property to which we provide services, and for this purpose may require copies of tenancy agreements, mortgage records or utility bills or supply records.

iv. Information relating to change of name or status, which may include marriage certificates, death certificates and other official documentation. We may need this information where we are asked to close or transfer an account.

v. Integrated Public Number Database (IPND). In providing telecommunications services, we are required by law to collect certain personal information about you (including your name, address, telephone service number and other public number customer details), and to provide it to operator of the Integrated Public Number Database ('IPND') for inclusion in the IPND.

(c) We also collect information about the way our customers use our products and services. This includes information about:

i. service usage (including use of communication services, internet usages);

ii. responses to offers made and/or promotions run by us or our affiliates;

iii. payment patterns and history; and

iv. inquiries and complaints.

(d) We may collect personal information about associates of our customers, such as family members, employees or agents. For example, we may collect personal information about nominated or authorised representatives, the holder of a credit card that is used to pay a customer's account, a person who acts as a secondary account holder, a person who acts as guarantor for a credit contract, the landlord of a tenanted property or the nominated contact on a business account. If you supply us with personal information about another individual, you must inform that person that you have provided their personal information to us, ensure they are aware of this Privacy Policy, and where required, obtain their consent to the collection, use and disclosure of their personal information as described in this Privacy Policy.

(e) We have adopted the position proposed by the Privacy Commissioner that a young person is able to give their consent when he or she has a sufficient understanding and maturity to understand what is being proposed. We will make an objective determination before collecting that information as to whether the person involved would be able to provide informed consent to the collection, use and disclosure of their personal information. Where we determine that a young person does not have capacity to consent, we will seek consent from a parent or guardian.

(f) We also collect personal information about individuals who are involved in providing our products and services. This includes:

i. our staff, and staff of all associated companies of UCOM; and
ii. our service providers and suppliers, agents and affiliates, and their staff.

5. How Do We Collect Personal Information?

(a) We collect information about Prospective Customers and Current Customers directly and via our agents, service providers and affiliates. We may collect this information:

i. when you make an inquiry at a kiosk, dealer, or event, which is operated by us;
ii. through our door to door sales activities;
iii. through our call centres;
iv. through our websites, or websites operated by our affiliates;
v. through social media platforms such as LinkedIn and Facebook; and
vi. through the purchase of marketing lists, databases and data aggregation services.

(b) When you apply to become our Customer, we will ask you to consent to us collecting information from particular third parties, including credit reporting bodies. We will only collect personal information from those parties if you consent, except where we are authorised or required to do so under Privacy Law. If you do not consent where your consent is required, we may not be able to provide the service or product you require. In some circumstances, we are authorised to collect personal information from third parties under Privacy Law without your consent, including for credit reporting purposes under Part IIIA of the Privacy Act 1988 (Cth).

6. Why Do We Collect Personal Information?

(a) We collect personal information in order to:

i. provide products and services to customers;
ii. manage and administer the products and services we provide, including for billing and credit control purposes (which may involve identity verification, credit checking, assessing entitlement to concessions, supplying and servicing a product, connecting and administering a service, billing and collection in relation to the service and investigating and rectifying complaints or faults).
iii. inform customers about changes and improvements in our products and services;
iv. create aggregate data through demographic profiling and statistical analysis of the database, and to allow for more efficient operations of our business;
v. market our products and services to customers;

vi. market third party products and services to customers, where we have obtained consent or are otherwise permitted to do so under Privacy Law;
vii. manage job applications;
viii. manage relationships with our staff, contractors, agents, affiliates and service providers;
ix. establish, exercise or defend any legal claims; and
x. comply with our legal obligations.

(b) We need to use personal information for most of our business activities, although the information we require depends on the circumstances. If we are unable to collect the personal information we need, we may be unable to meet the expectations of our Customers or provide the products and services they wish to receive.

(c) The personal information we collect may be shared within the UCOM group of affiliated companies for the purposes outlined above, provided such sharing is consistent with the purposes for which the information was collected or a related secondary purpose, or where we have obtained your consent.

7. Direct Marketing

(a) We will only use or disclose personal information for direct marketing purposes where we have obtained the customer's consent, or where the customer would reasonably expect us to use or disclose the information for that purpose and it is impracticable to obtain consent, or where we collected the information from a third party and the customer has consented to the use for direct marketing or would reasonably expect us to use it for that purpose. In all cases where we use or disclose personal information for direct marketing, we will:

i. include an ‘unsubscribe’ facility so customers can unsubscribe from the mailing list at any time; and
ii. provide a simple means by which customers may easily request not to receive further direct marketing communications; and
iii. include a prominent statement to the fact that a customer may make such a request.

(b) Direct marketing communications may be sent via post, e-mail, telephone, SMS, social media sites or other means. Where we send marketing communications by email or SMS, we will comply with the requirements of the Spam Act 2003 (Cth). We will not send marketing communications to telephone numbers listed on the Do Not Call Register, except where permitted under the Do Not Call Register Act 2006 (Cth).

8. Dealing With Us Online

(a) **Cookies**

i. We store the Internet Protocol (IP) address of your computer when you visit our site. This information is used only to create broad demographic summaries of where our users come from.

ii. Cookies are small units of data sent to a user's browser by a website the user visits. We use cookies to:

   a. facilitate the use of our website;
   b. improve our Customers' website browsing experience;
   c. monitor and analyse our Customers' use of our site and affiliated third party sites; and
   d. enable us to present customised messages and offerings to customers.

iii. The cookies we use do not directly store personal information such as your name or contact details. However, cookies may collect information that can identify your device or browser. If an individual is logged into our customer portal as a Customer, the information we collect via cookies may be linked with their personal information and will be treated as personal information under this Privacy Policy.

iv. You can configure your Internet browser to erase cookies from your computer's hard drive, block cookies or receive a warning before a cookie is stored. If a user disables the use of, or deletes, cookies on their web browser then they may not be able to gain access to all the content and facilities of our websites.

(b) **Google Analytics**

i. Our website(s) may use Google Analytics, a web analytics service provided by Google. Google utilizes the data collected to help us analyse how users use the websites. The information generated by the cookie about a customer's use of the website (including its anonymized IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating customer use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and Internet usage.

ii. Google will not associate your IP address with any other data held by Google.

iii. We may combine information collected through Google Analytics with other information we collect, to enable us to provide you with relevant marketing content.

(c) **Use of Remarketing Tools**

i. We may use Google remarketing, Facebook remarketing, pixel tags, web beacons, clear GIFs or other similar technologies to collect information of a Customer's visit to any one of websites and we may tailor advertising or content based on the customer's use of these sites. These advertisements may be delivered by third party vendors when you visit our websites or other

Internet websites. You can opt-out of sharing information about your use of this site or affiliate third party sites by accessing the settings of your device or browser.

ii. We collect information about the other websites that are visited by computers that are used to visit our site. This information may be aggregated to provide us with information about the webpages and websites visited by computers that use our site.

iii. Note that this privacy policy does not apply to, and we are not responsible for, the use of, or the protection of information you provide to other websites linked from this website.

9. Do We Disclose Personal Information to Third Parties?

(a) We may disclose personal information about our Customers to a range of third parties. For example, to third party agents and service providers who we engage to provide our products and services, these may include:

i. sales agents and representatives;

ii. organisations that process banking transactions;

iii. organisations that process debt collection;

iv. printers, mail distributors, couriers and dispatch centres;

v. call centres operated by entities outside the UCOM Group;

vi. IT service providers and data managers;

vii. legal, accounting, insurance and business advisory consultants services.

(b) We may also disclose personal information for credit checking, collection or credit reporting purposes to a credit reporting agency or credit collection agency, in accordance with the requirements of the Privacy Act 1988.

(c) Personal information we obtain in connection with the provision of telecommunications services may be disclosed in accordance with requirements of the Telecommunications Act 1997 (Cth) and the Telecommunications (Interception and Access) Act 1979 (Cth). This includes disclosure:

i. to the Telecommunications Industry Ombudsman for the purpose of complaint management;

ii. in connection with directory assistance, emergency service calls or other urgent services, and in particular to the operator of the IPND for inclusion in the IPND, including your name, address, telephone service number and other public number customer details;

iii. to law enforcement agencies for law enforcement or security purposes; and

iv. as required by law.

10. How Do We Protect Your Personal Information?

(a) We recognise the importance of protecting your personal information and of ensuring that it is complete, accurate, up-to-date and relevant. When you call us in relation to your account or service, we complete an ID check to verify your identity and to check the details we hold about you are correct and to update them if required.

(b) We have documented processes for verifying personal information collected for particular transactions. Our staff are trained to properly handle the different types of information they receive, particularly sensitive information. We have quality assurance measures in place to monitor calls to ensure that our processes are being followed.

(c) While some of the personal information we collect is held in hardcopy form, most personal information is stored in electronic databases. We have extensive processes in place to ensure that our information systems and files are kept secure from unauthorised access and interference, including encryption, access controls, and regular security audits in accordance with the Australian Privacy Principles and the Notifiable Data Breaches scheme under the Privacy Act 1988 (Cth).

(d) We have contractual arrangements in place with our agents, service providers and affiliates that require them to comply with applicable privacy laws and our privacy policies. We require third parties who are outside Australia to handle the personal information we transfer to them with the same level of protection as would apply to the information in Australia under the Australian Privacy Principles. Before disclosing personal information to overseas recipients, we take reasonable steps to ensure the recipient does not breach the APPs in relation to the information, or we obtain your consent after expressly informing you that APP 8.1 will not apply if you consent. Where we are unable to ensure compliance, you will be informed that we will not be accountable under the Privacy Act 1988 (Cth) for any breaches by the overseas recipient.

11. Can You Access or Correct Personal Information We Hold About You?

(a) You have a right to access personal information we hold about you. You are also entitled to ask us to provide you with the details we have provided about you to the IPND. You can do this by contacting us using the details provided in section 12(c) below and we will provide you with the information within a reasonable time, usually 30 days from receipt of your request.

(b) If your request to access personal information is particularly complex or requires detailed searching of our records, the Privacy Act permits us to charge you a reasonable cost to provide you with this information. We will inform you of any applicable charges before processing your request and provide you with an estimate of those charges. You will not be charged for making the request, and any charge will only relate to the reasonable costs of providing access.

(c) We will provide access to the information held about an individual, including for the purposes of correcting or updating that information, unless there is an exception which applies under APP 12.3. If we refuse to provide access or correct information, we will provide you with a written notice setting out the reasons for refusal (unless it would be unreasonable to do so) and the mechanisms available to you to complain about the refusal.

(d) You have a right to ask us to correct information we hold about you if it contains errors or is out of date, incomplete, irrelevant or misleading.

(e) We will make the corrections provided that any changes are in line with IPND requirements. We do not charge you to access or correct your information in the IPND.

12. Complaints and Further Information

(a) If you would like to complain about a breach of the Australian Privacy Principles or our handling of your personal information, you may contact our Privacy Officer at the details below.

(b) The Privacy Officer will investigate your complaint and notify you of the outcome within a reasonable period of time, usually 30 days from receipt of the complaint. If we need more time to investigate, we will contact you to explain why and provide an estimate of when we expect to respond. If you disagree with our decision or do not receive a response from us within 30 days, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC) by visiting www.oaic.gov.au/privacy/privacy-complaints, calling 1300 363 992, or writing to GPO Box 5218, Sydney NSW 2001.

(c) If you would like further information on the way we manage personal information, would like to request access to or correction of personal information, or wish to make a complaint, please contact:

UCOM Customer Care

Attention: The Privacy Officer

Address: SE5 L2 2-6 Glenferrie Rd Malvern VIC 3144

Email: care@ucom.com.au

Phone: 1800 00 8266

13. Changes to Our Privacy Policy

(a) We may review and revise our Privacy Policy from time to time. We may notify you about changes to this Privacy Policy by posting an updated version on our website. Please check our website from time to time to ensure you are familiar with our latest Privacy Policy.