



Experian Australia Privacy Policy 2022

December 2022



Our commitment

At Experian Australia Pty Ltd ('Experian Australia') we recognise the importance of your privacy and understand your concerns about the security of your Personal Information.

While information is the foundation for providing you with superior service, protecting the privacy of your Personal Information is of the highest importance to us. We believe that responsible stewardship of the information entrusted to us is crucial in developing and maintaining the public trust which in turn is essential for our continued success.

We are bound by the Australian Privacy Principles ('APPs') contained in the Privacy Act (subject to exemptions that are applicable to us under the Privacy Act), our general law obligations of confidentiality to you, and all other applicable guidelines and codes in Australia.

Scope

This privacy policy ('Policy') details how Experian Australia manages Personal Information about you. Where this Policy uses a word starting with a capital letter, that term will be defined in the Glossary section or elsewhere in this Policy.

We may, from time to time, review and update this Policy, including taking account of new or amended laws, new technology, and/or changes to our operations and practices. All Personal Information held by us will be governed by the most recently updated Policy. Accordingly, please also regularly check our Policy so that you are aware of these updates and changes. If you have any questions, please contact us online at experian.com.au or via email at info@au.experian.com.

What kind of Personal Information do we collect?

The types of Personal Information we collect from you depend on the circumstances in which the information is collected.

We may collect contact details including your name, address, email address, phone numbers, and your date of birth / age. We may also collect digital data such as your IP address, mobile advertising ID, and cookies, as well as answers you provide to questions we ask and other information in relation to your dealings with us.

Where we collect Personal Information from third parties, we are careful to seek confirmation from those providing us with the information that it was acquired in accordance with the requirements of the Privacy Act, that they are entitled to provide it to us, and that they can authorise us to use it for the purposes for which they are supplying it.

We may also collect details of the company that you work for, or your details or those of your business if you are a sole trader.

If you apply for employment with us, we may also collect information for the purpose of considering your application, including your qualifications and resume as well as reference information from your nominated referees.

If you are an individual contractor to us, we may also collect information relevant to your engagement with us, including qualifications, work history, resume, reference information from your nominated referees, bank details, feedback from supervisors, and training records.

We do not generally collect Sensitive Information from you or about you unless there is a legal requirement to do so, or unless we are otherwise permitted by law. In all other situations, we will specifically seek your consent for the collection of Sensitive Information.

In addition to the types of Personal Information identified above, we may collect Personal Information as otherwise permitted or required by law.

So far as is reasonably possible we are happy to deal with you anonymously or under a pseudonym, if you prefer. Generally, we can provide information about our products and services without requiring you to provide contact details, however you should be aware that if you do elect to remain anonymous or use a pseudonym it may impact on our ability to provide full and detailed information, products, services, or assistance to you.

If you do deal with us under a pseudonym, we would of course prefer to know that it is a pseudonym, to avoid collecting inaccurate information. Similarly, if you have provided us with your contact details, and those details subsequently change, we would appreciate your informing us of the change so that we can ensure our records are kept up to date.

How do we collect Personal Information?

We collect Personal Information in a number of ways. The most common ways we collect your Personal Information are:

- directly from you when you provide it to us or our agents or contractors;
- via our website or when you deal with us online (including through our social media pages);
- from publicly available sources;
- from our related companies;
- from our clients where you have provided them with your consent;
- from third parties (for example, collection of Personal Information about referees if you apply for a position as an employee or contractor with us); and
- from data suppliers where you have provided them with your consent to use your information.

Why do we collect Personal Information and how do we use it?

The purposes for which we use and disclose your Personal Information will depend on the circumstances in which we collect it. Whenever practical we endeavour to inform you at the time of collection why we are collecting your Personal Information, how we intend to use that information, and to whom we intend to disclose it.

We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and

- as otherwise authorised or required by law.

In general, we collect, use, and disclose your Personal Information so that we can do business together and for purposes connected with our business operations.

Some of the specific purposes for which we collect, use, and disclose Personal Information are:

- to enrich data with additional attributes
- to carry out customer and marketing research and modelling
- to facilitate targeted digital advertising
- to cleanse and validate data such as addresses, email addresses, and phone numbers using reference data based on data quality rules
- to respond to you if you have requested information (including via our websites or via an email or other correspondence you send to us);
- to provide goods or services to you or to receive goods or services from you;
- to improve our goods and services, including troubleshooting, internal testing, caching/storing of data for finite periods of time, and general quality improvement;
- to verify your identity, address, and age or eligibility to participate in a marketing activity;
- to consider you for a job with us (whether as an employee or contractor), or in the context of other relationships with us;
- to address any issues or complaints that we or you have regarding our relationship;
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner;
- to disclose to revenue collecting agencies as a relevant third party on receipt of valid notices; and
- to comply with Australian law or court/tribunal order.

We may also use “cookies” and similar technology on our websites and in other technology applications. The use of such technologies is an industry standard and helps to monitor the effectiveness of advertising and how visitors use our websites/applications. We may use such technologies to generate statistics, measure your activity, improve the usefulness of our websites/applications and to enhance the “customer” experience.

If you prefer not to receive cookies you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used. However, our websites may not function properly or optimally if cookies have been turned off.

How do we hold that information?

Generally, your Personal Information is held by electronic means in our secure data centres in Melbourne and Sydney, and via cloud storage on the AWS Sydney server. In specific instances, in particular, when Experian provides email validation services to our clients, email addresses are encrypted (no plain text traffic is ever sent over the internet) prior to leaving Australia and held for up to three months within an Azure data centre in the USA for the purpose of improving our goods and services (as set out above). In all cases, we have procedural safeguards in place for Personal Information, and take reasonable steps to ensure that your Personal Information is protected from misuse, interference, loss, and unauthorised access, modification, and disclosure.

Direct marketing

Direct marketing involves communicating directly with you for the purpose of promoting goods or services to you and to provide you with special offers. Direct marketing can be delivered by a range of methods including mail, telephone, email, or SMS. It also covers digital channels such as social media, digital display advertising, and connected television. You can unsubscribe from our direct marketing, or change your contact preferences, by either contacting us or by updating the settings on your respective devices not to enable targeted digital advertising.

Where we use your Personal Information for marketing and promotional communications, you can opt out at any time by notifying us.

Who do we disclose Personal Information to?

We may disclose your Personal Information to third parties in connection with the purposes described in earlier in this Policy.

This may include disclosing your Personal Information to the following types of third parties:

- our employees and related bodies corporate to create data products or to enhance services;
- our clients where they have engaged Experian to provide products or services;
- our contractors and other third parties that provide goods and services to us (including website and data hosting providers, and other suppliers);
- our accountants, insurers, lawyers, auditors, and other professional advisers and agents;
- payment system operators, if relevant;
- if you are an individual contractor to us or a prospective employee, to our related companies and HR related service providers (e.g. for outsourced payroll processing);
- any third parties to whom you have directed or permitted us to disclose your Personal Information (e.g. referees);
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors; and
- third parties that require the information for law enforcement or to prevent a serious threat to public safety.

Where we disclose your Personal Information to third parties, including business partners, advertisers, and/or government stakeholders for the purposes set out above, and/or for reporting, research, and analysis purposes, we will take reasonable steps to ensure that such third parties only use your Personal Information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the APPs under the Privacy Act.

We will not disclose Personal Information about you for any other purposes, except that we may disclose or use your Personal Information where:

- we are under a legal duty to do so, including circumstances where we are under a lawful duty of care to disclose information; or
- such disclosure is authorised or permitted by the APPs, law, or you.

Disclosure of Personal Information overseas

We generally do not disclose your Personal Information outside of Australia. In rare instances, outside of cases where we may rely on an exception under the Privacy Act, if we do disclose Personal Information to overseas recipients, we will take reasonable steps to ensure that such overseas recipients do not breach the APPs in relation to such information.

While Personal Information is generally held in our data centres in Sydney and Melbourne (with cloud storage on the Sydney AWS server), in the event of a failover we may be required to access your Personal Information in our data centres from other Experian global locations such as the UK and USA.

What are the main consequences if you do not provide your information to us?

You can choose not to provide your Personal Information to us. However, if you do not provide your Personal Information to us, you may be unable to:

- use or navigate our website; and/or
- communicate with us regarding your queries.

Additionally, if you do not provide your Personal Information to us, we may be unable to:

- answer your enquiry; and/or
- provide any other services that you, Experian's clients, or your organisation have contracted us to provide.

External links

Our website may include links to third party websites. If you access other websites from the links provided on our website, the operators of those websites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from our Policy. We recommend that you examine the privacy statements posted on those other websites to understand their procedures for collecting, holding, using, and disclosing Personal Information.

Accuracy of the Personal Information we hold

We rely on the Personal Information we hold about you in providing you with our services or otherwise conducting our business. Therefore, it is important that the information we hold about you is accurate, complete, and up-to-date. This means that from time to time we may ask you to tell us if there are any changes to your Personal Information. The information we receive from the users of our products and services, and the data we collect from publicly available sources and third parties, are subject to various processes to ensure the information is accurate. Where updated information is available we will incorporate it into our products as soon as practicable. The time it takes to apply updates to products depends on the product itself and the sources of data relevant to it. Whilst some information can be updated almost immediately, others have release cycles as long as three months, so the time taken for a change to become effective may vary considerably. To assist us to keep our records up-to-date, please advise us immediately when your Personal Information changes.

How are you able to access and correct your Personal Information?

We have procedures in place for dealing with and responding to requests to access and/or seek correction of the Personal Information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access to or to amend the information as requested, we will give you written reasons why. For further information or to request access or correction to Personal Information we may hold about you, please contact us online at experian.com.au or via email at info@au.experian.com.

Complaints

We take every effort to ensure that our information management practices comply the applicable law, however, if you feel that Experian has not complied with our obligations under the Privacy Act, you can contact us with the details of your complaint. We will acknowledge receipt of your complaint within 7 days, we will investigate your complaint and will seek to resolve your complaint within 30 days. To submit a complaint, please contact us online at experian.com.au or via email at info@au.experian.com.

If you are not satisfied with the outcome of our investigation, you may refer the matter to the Office of the Australian Information Commissioner using the details below.

Office of the Australian Information Commissioner

Online: www.oaic.gov.au/about-us/contact-us-page

Phone: 1300 363 992 (Australia) or + 61 2 9284 9749 (International).

Email: enquiries@oaic.gov.au

Fax: +61 2 9284 9666

Post: GPO Box 5218 Sydney NSW 2001

Further information

This Policy reflects general information on how we:

- comply with our obligations under the Privacy Act; and
- collect, hold, use, disclose, and manage your Personal Information.

This Policy is not legal advice and is not intended to replace the rights, duties, and obligations a party has under the Privacy Act. Nothing in this statement is intended to create or impose rights, remedies, or obligations additional to those set out in the Privacy Act. All reasonable care has been taken by Experian Australia to prepare and keep this statement up to date. However, the information contained in this policy is not intended to be a warranty or representation or otherwise to create any legal contractual relationship or obligations between you and Experian Australia.

Glossary

"Experian Australia", "we", "us" or "our" means Experian Australia Pty Ltd.

"Personal information" is information or an opinion about an identified individual, or about an individual who is reasonably identifiable, whether or not the opinion is true or not and whether or not the information is stored in material form or not.

"Privacy Act" means *Privacy Act 1988* (Cth).

"Sensitive Information" is a special category of Personal Information. It is 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 preferences or practices, criminal record, Health Information about an individual or genetic information about an individual that is not otherwise Health Information.