

## About this policy

Flow Systems Pty Ltd and its subsidiaries (**we, us** and **our**) are part of the Brookfield Group and provide essential utility services such as water and wastewater services, electricity and central hot water. We may trade in the name of the local community.

We are committed to protecting the privacy of your personal information. Personal information is:

*Information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- (a) *whether the information or opinion is true or not; and*
- (b) *whether the information or opinion is recorded in a material form or not.*

This Privacy Policy confirms how we meet our obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles.

This Privacy Policy applies to our customers, visitors to [www.flowsystems.com.au](http://www.flowsystems.com.au) and websites of our subsidiaries (**our websites**), subscribers to our publications and our blogs, and any other individual who interacts with us.

We handle your personal information in accordance with the Privacy Act. In the limited circumstances where we may collect health information, if you are medically dependant on services (as provided in our Customer Contract), we also comply with applicable State or Territory legislation.

By visiting our website, applying for or using any of our services (or information about those services), or reporting faults, including via our outsourced providers, or providing us with your information, you agree to your information being collected, held, used and disclosed as set out in this Privacy Policy.

In this policy, when we refer to a 'Service Provider' we mean a third party with whom we interact in relation to our services, such as developers, strata managers, property managers, facility managers, owners corporations, body corporates and other third parties, such as information technology providers, who we've contracted to provide administrative services.

## What kinds of personal information do we collect and hold?

We collect your personal information so that we can provide you with our services, provide information about our services, develop and enhance our services and carry out our activities.

The kinds of personal information we collect include your name, proof of age, contact details, address (billing and supply), information required for identification purposes (such as date of birth, driver's licence numbers and passport numbers etc), payment details (including credit card or bank account details), development application and property plans (excluding high-rise), whether you are the property owner or a tenant, records of your communications and interactions with us and details of consumption of our services. We may also collect concession eligibility information if it is required in order to provide any concessions.

We also collect credit information and credit eligibility information. Our *Credit Information Policy* is located at [http://flowsystems.com.au/governance/Credit\\_Information\\_Policy.pdf](http://flowsystems.com.au/governance/Credit_Information_Policy.pdf)

## How do we collect and hold personal information?

We collect your personal information in various ways, including via telephone, our website, hard copy forms or email.

We collect personal information when you communicate with us, for example when you:

- register with us or apply to connect by completing our registration or help centre forms or by telephoning our customer service team;
- when you email us, when you telephone our customer service team, when you provide feedback; or
- when you agree to receive notifications of network issues or outages and/or marketing material in relation to the services we provide.

We may also collect personal information about you from a Service Provider when that information relates to services provided on our behalf.

In addition, we use call recording as a method of capturing personal information. We use call recording to verify details, and to monitor and train our staff.

## Security of your information

We take all reasonable steps to hold your personal information securely.

Generally, we hold your personal information in electronic format. We may store your personal information in electronic format with an information technology provider (which may be located overseas).

We take steps to ensure that all our Service Providers agree to protect the privacy and security of your personal information, and to use it only for the purpose for which it is disclosed to them.

All personal information we receive via our online services is encrypted in transit and stored securely. We also use access controls and other security measures and periodically review and update our security measures in light of current technologies.

We may also maintain paper records containing personal information in secure storage facilities and premises. If you send us a paper form we will store a scanned copy securely in our online system. We will not ask you to email us personal information. Instead we may ask you to attach and upload a scanned copy of the required information via our online support websites.

When you use our website or access emails from us, we may use cookies or pixel tags to collect information. However, this information generally does not include information which identifies you or from which you could readily be identified.

In summary:

- website cookies collect information such as what pages you visited;
- if you use a mobile phone to access our website or emails, the cookies may identify from what location you accessed this information; and
- pixel tags provide us with information about your activity on our websites as well as when you open and access our emails and we sometimes disclose the information from these pixel tags to third parties.

Information collected by our website cookies and pixel tags is only used to provide statistics about the use of our website and emails and to assist us to improve these services.

## What are the purposes for which we collect, hold, use and disclose personal information?

We collect, hold, use and disclose your personal information for the purpose for which it was collected, related purposes that you would reasonably expect, and as permitted or required by law.

Such purposes include:

- responding to your inquiries, complaints and claims in relation to the sale and supply of our services;
- supplying services to your premises and related assistance (for example, processing requests for connections, managing supply, communicating metering/usage information);
- managing billing (for example, payments, reminders, payment options and processing payments you have authorised);
- credit management, including assessing your creditworthiness;
- complying with our obligations under any contract with you or applicable law;
- processing your survey or questionnaire responses for the purpose notified in the survey or questionnaire (if you have chosen to participate in such);
- for market research so that we can better understand the needs of our current and future customers' needs and tailor our future products and services accordingly;
- providing you with marketing information regarding products and services (of ours or of a third party) which we believe may be of interest to you, but only if you have not opted out of receiving such information;
- providing you with information (such as educational material and material on events and programs) about sustainable use of resources (including water and energy);
- disclosing to related entities and to enable them to market products and services which we believe may be of interest to you, but only if you have not opted out of receiving such information;
- quality assurance and training purposes;
- to pursue recovery and enforcement action in relation to unpaid and overdue accounts for our services; and
- any other purposes identified at the time of collecting your information.

We may use your personal information for another purpose in limited circumstances such as where:

- you consent;
- it is for a purpose related to the purpose for which we collected the information and you would reasonably expect us to use or disclose it for that purpose; or
- where otherwise required or permitted by law.

## How and to whom do we disclose personal information?

We may disclose your personal information to our Service Providers and other third parties to carry out activities on our behalf or to provide services to us, including:

- meter readings, maintenance or repair services;
- customer acquisition strategies;
- data storage, warehousing and management services;
- payment processing and e-commerce services;
- mailing and logistics services;
- market research to help us improve and target our services;
- marketing including running our surveys, events and promotions; or
- entities that assess creditworthiness or assist in recovery action against you if you are in breach of your obligations.

## How do you obtain access and seek correction?

Generally, we will provide you with access to any information we hold about you on request. In limited circumstances, however, access may be refused if required or permitted by law. For example, you may be refused access to your personal information:

- where there are anticipated or existing legal proceedings and that information could not be subject to a process of discovery;
- where we consider that providing access poses a serious threat to life, health or safety; or
- where access may have an unreasonable impact on the privacy of other individuals.

If after you make a request, we refuse to provide you access to your personal information, we will explain why in writing.

We do not charge an application fee to access your personal information, but may charge a reasonable fee for giving you access, including photocopying costs.

If you believe that any personal information we hold about you is incorrect or out-of-date, you should contact us using the contact details below. Where we decide not to make the requested correction, we will explain why in writing.

## How can you complain about a breach of the Australian Privacy Principles?

If you have a complaint about how we have handled your personal information, we will deal with the complaint as follows:

- You should contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint, as well as any supporting evidence and/or information.
- We will refer your inquiry or complaint to a person not directly involved in the subject matter of the complaint.
- You will receive an acknowledgement that we have received your complaint and the issue is being investigated.
- We will, within a reasonable time, investigate the issue and determine the steps that we will undertake to resolve the complaint.
- We will contact you if we require any additional information from you and will notify you in writing of the response or determination. Unless there are exceptional circumstances, we aim to resolve the investigation and complaint within 30 days.

If you are not satisfied with our response or determination, you can contact us or raise your concerns with the Office of the Australian Information Commissioner via <http://www.oaic.gov.au>

## How to contact us

If you wish to contact us about the handling of your personal information, accessing or correcting your personal information, or to make an inquiry or complaint, please contact our Privacy Officer by:

Mail: PO Box R455, ROYAL EXCHANGE, NSW 1225

Email: [privacy@flowsystems.com.au](mailto:privacy@flowsystems.com.au)

Online: Click [here](#) to access the online form and select Privacy as your Query topic

Telephone: 1300 803 803