



Swift Networks Pty Ltd

ABN 96 125 828 453

PRIVACY POLICY

Privacy Policy

1 Privacy Policy

This policy applies to all of our Customers including past, present and future customers, applicants be they accepted or declined, casual users of our online services and participants in our direct marketing and promotional efforts.

This policy covers all customer personal and sensitive information collected by us.

1.1 OPENNESS

We are committed to ensuring that the privacy of customers is protected with great care. Our privacy policy explains our practices in relation to information provided to us.

As this policy may be updated we recommend that our customers review this policy periodically.

In addition to this policy, use of certain services or parts of our websites may also be subject to specific and additional privacy provisions. To the extent of any inconsistencies, those specific and additional provisions take priority over this policy.

1.2 PERSONAL INFORMATION

We use the definition of personal information contained within the Privacy Amendment (Private Sector) Act 2000.

For the purpose of clarification we do not consider the personal opinions of employees relating to customers as personal information.

1.3 COLLECTION OF INFORMATION

We gather information about our customers through Application and registration activities, promotions and competitions. We only collect information necessary for the purpose of providing customers with our services. Specifically we collect personal information for the purposes of:

- Customer account and service management;
- Bill AnalyserBeta, offer determination and credit assessment; and
- Marketing and promotion.

We will primarily collect personal information from the individual to which the information relates. If this is not possible, then personal information may be collected from the individual's lawful representative or interpreter. We may obtain personal information from reputable direct marketing "list providers".

We will direct our customers to our privacy policy at the time of collecting personal information. We will specify the purpose for which personal information is being collected at the time of collecting personal information.

1.4 USE AND DISCLOSURE

We use information collected on our customers for a variety of purposes.

We will use or disclose or permit the use or disclosure of personal information within related companies and our partner organisations. Our partner organisations are those third parties that we use from time to time to assist us in providing our services. We will not otherwise use or disclose or permit the use or disclosure of any personal information unless one or more of the following apply:

- A customer has consented so;
- The use or disclosure is required or authorised by law or is necessary to assist a law enforcement or national security body in the performance of its functions;
- We believe the use or disclosure is necessary for the operation, development or administration of our services or website;
- The use or disclosure relates to the preparation for, conduct of, or orders arising from legal proceedings of a court or tribunal.

1.5 DIRECT MARKETING

From time to time we will utilise direct marketing to inform customers about our or our partner organisations' offers and promotions. Where practicable we will seek consent from customers before including them in direct marketing initiatives. We will provide customers the opportunity to opt out of each specific direct marketing medium and general types of direct marketing material.

In this context we do not consider direct marketing to include the mere provision of information to customers with respect to their existing service or our policies, terms and conditions or charges.

We may from time to time disclose, rent or on-sell or otherwise communicate personal information to our partner organisations for the purpose of enabling them to offer products and services directly to our customers. We will only do this where we believe the products or services to be of particular interest to our customers.

1.6 CUSTOMER ACCESS TO PERSONAL INFORMATION

Customers may apply to us to obtain details of personal information held by us. We will not ordinarily levy a charge on the customer for information provided verbally. Customers may apply for detailed information, the provision of which may incur an administration fee. Such Application will only be considered if made in writing to us. Any specific costs associated with the provision of the information such as the purchase of media such as compact discs will be charged to the customer on a direct recoupment basis.

We reserve the right to withhold requested information until receipt of any applicable fees and charges.

We will not provide personal information where Schedule 3 of the National Privacy Principles 6.1 (a) - (k) apply. In such instances, we will consider the use of an intermediary or give the customer an explanation for a commercially sensitive decision rather than direct access to the information.

1.7 UPDATING PERSONAL INFORMATION

When an individual advises that personal information is not accurate, complete, and up-to-date, the information, subject to variation, will be updated within five (5) business days.

If we do not agree with an individual regarding accuracy, completeness, or that the information is up-to-date, a record will be made stating so and reflecting both the conflicting information and opinion of the individual.

1.8 DATA QUALITY

We will take all reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date.

1.9 DATA SECURITY

We will take all reasonable steps to protect personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.

Where information is no longer required for our purposes then it shall be disposed of through appropriate means.

1.10 ONLINE PRIVACY AND SECURITY

a) IP ADDRESSES

We may collect non-personal information to analyse trends, administer our website, and research broad demographic information for the improvement of the services offered by us. This is done by gathering aggregated information such as the date, time and length of visit, IP addresses and domain and browser type. This information may be shared with advertisers to indicate how our website is utilised, but is in no way linked to personally identifiable information about our customers.

b) COOKIES

We will use cookies. We will not collect information contained within cookies unless an error is generated during your use of our website. In such instances we will maintain a copy of the information for the purpose of addressing that error.

c) EMAIL

We will store the contents of any emails if we believe we have a legal requirement to do so. Any personal information contained in an email received by us is subject to this Privacy and Security Policy.

d) SPAMMING

"Spamming" is unsolicited and uninvited promotional email. We are opposed to its use and will not engage in this type of promotional email usage.

e) LINKS

Our website may contain links to third party websites outside our website. We are in no way responsible for the privacy and security practices on these sites. They are in no way covered by the policy set out here, and should have their own privacy and security policy contained on their site, which we encourage our customers to read.

f) SHARING

We will share aggregated information and demographic information with our partner organisations and advertisers, which is not linked to any personal information about our customers.

Advertisers on our site may also collect information. We do not have any control over this data collection. This also relates to any cookies they may use.

g) SECURITY

Whilst we take every precaution to protect our customers' information, sending personal information over the internet remains entirely at our customers' own risk, and we will not be responsible for any unauthorised use of this information.

h) PASSWORDS

It is our customers' responsibility to maintain the security of any password, username they may choose or we may assign. We ask our customers to notify us immediately if they suspect someone else may have unauthorised access to their password, username etc.

We will hold customers responsible for any use of our website or services under their password, username etc, including actions they did not approve or authorise.

i) SENSITIVE INFORMATION

We use the definition of sensitive information contained within the Privacy Amendment (Private Sector) Act 2000.

j) COLLECTION

We may collect sensitive information in specific circumstances. This information will only be collected where a customer has consented to this.

k) USE AND DISCLOSURE

We will use sensitive information for the purposes of assessing an Application in specific circumstances and qualifying criteria for tailored offers, as they may exist from time to time.

l) DIRECT MARKETING

Sensitive information is not used for direct marketing unless the customer has specifically opted to receive direct marketing.

m) IDENTIFIERS

We will not use any identifier that is assigned by a government agency or agency for a government agency including but not limited to driver's licences, Tax File Numbers, Medicare numbers or passport numbers.

n) TRANSBORDER DATA FLOWS

We will not exchange personal information between our overseas operations or with third parties not based in Australia unless they specifically agree to treat any personal information in accordance with the requirements that apply within Australia.

1.11 [More Information](#)

If you would like to know more about on-line privacy, visit [The Australian Privacy Commissioner's Web site](#).