



nbn plain English privacy policy

nbn™ Privacy Policy | Unclassified | <BMS001629> | Rev 8.2 | 23.10.18

About this Policy

The **nbn™** Privacy Policy is set out on pages 3 – 9 of this document.

Purpose

Compliance

Under the *Privacy Act 1988* (Cth), **nbn** is an 'APP entity' subject to the Australian Privacy Principles (**APPs**) regarding the personal information that it handles.

APP 1 requires that **nbn** have, amongst other things, a publically accessible Privacy Policy that meets the requirements set out in APP 1.

APP 5 requires that **nbn** notify individuals of certain matters specified in APP 5, at the time that it collects their personal information. One of the ways in which APP 5 may be satisfied is by providing the individual with a copy of or link to an APP 5-compliant Privacy Policy.

Accuracy

nbn™'s Privacy Policy was last updated in November 2017.

This update includes minor amendments to reflect current **nbn** activities and information handling practices as part of the annual review of this Policy, which occurs in January each year.

Privacy Legal has been consulted on these amendments.

Scope

This policy applies to **nbn**'s handling of personal information in all contexts.

Policy

This Policy has been drafted to achieve best privacy practice. In particular, this Policy aims to communicate **nbn**'s privacy practices to the general public in a simple and easily understood way, to achieve effective transparency and build trust with end users.



Roles and responsibilities

- **Role: Chief Security Officer** – Policy approver
- **Role: General Manager, Security Influence and Privacy Engagement/Privacy Officer** – Policy owner, approver of minor updates to Policy, manager of the Privacy Officer inbox, advisory role in privacy access and correction requests and complaints management
- **Role: Legal - FOI, Privacy & Knowledge Management** – Responsible for privacy access and correction requests and complaints management; stakeholder in updates process

More information

Kate Monckton - General Manager, Security Influence and Privacy Engagement/Privacy Officer

Kate Monckton
General Manager, Security Influence and Privacy Engagement/Privacy Officer
Effective as of October 23, 2018



[Text of Policy follows]

Privacy Policy

October 2018

1. About us

nbn is building Australia's new broadband access network. This policy describes how we handle your personal information.

nbn co limited (**nbn**) was established in 2009 to design, build and operate Australia's wholesale broadband access network. Our key objective is to ensure all Australians have access to fast broadband as soon as possible, at affordable prices, and at least cost.

To achieve this objective, **nbn** has been structured as a wholesale-only, open-access broadband network. **nbn** provides services on its local access network on equivalent terms to retail phone and internet providers, to provision for end-user needs. This is intended to level the playing field in Australian telecommunications, creating real and vibrant competition within the industry and providing choice for consumers.

You can read more about us and our objectives [on our website](#).

2. Your privacy is important to us

We keep your information safe, and we aim to be clear and open about what we do with it.

We understand that your privacy is important to you, and we value your trust. That's why we protect your information and aim to be clear and open about what we do with it.

This Policy describes how we handle your personal information – that is, information about you and that identifies you, or can be reasonably linked to your identity. When we collect this information, we comply with the rules set out in the *Privacy Act 1988* (Cth).

Sometimes we update our Privacy Policy. You can always find the most up-to-date version on our website.



3. What information do we collect?

We collect information about you when you interact with us. We may also collect information about you from other people and organisations.

We only collect your personal information when we need it to provide our services or to comply with the law. The kinds of information that we collect depends on how you interact with us. Here are some examples.

Information we collect from you

- **When you engage with us directly (including at public events, via telephone, email, our website or on social media):** The information you provide, such as your name and your contact details (telephone number and/or email address). When you attend one of our locations, we may also collect security camera footage of you.
- **When you sign up for updates on the delivery of the nbn™ access network:** Your name, street address and email address.
- **When you sign up for the Medical Alarm Register or Fire and Lift Register:** Your name, street address where the device is being used, and details about your alarm.
- **When you sign up for the Building Register:** Your name, building street address, email address, and telephone number.
- **If you apply for a job with us:** Information that you provide about your employment history, qualifications and ability.
- **If you fill out one of our surveys, or enter one of our competitions:** The information that you provide.

Information we collect from others

- **When you request a connection to the nbn™ access network or report a connection problem to your internet or telephone service provider:** We collect your address, contact details, and information about your request from your internet or telephone service provider(s).
- **To tell you about the rollout of the nbn™ access network:** We may collect your name and address from our service providers or from Australian Government agencies. Sometimes, we also collect addresses (but not names) from local councils. We do this so we can comply with our legal requirements to inform people in specific areas about the availability of the nbn™ access network and connecting to it.
- **To help migrate Medical, Fire and Lift alarms to the nbn™ access network:** We may collect addresses of homes and businesses with alarms, and information about those alarms, from alarm service providers.
- **When you participate in market research about us or the nbn™ access network:** We may collect information about you and your responses from the service provider that conducted the research.
- **If you apply for a job with us:** Background, references and criminal history information about you. We may also collect medical information (where relevant to the role) and conduct drug and alcohol testing.
- **If you work for one of our service providers or service delivery partners:** We may collect employment information about you including name, job title, contact details and background and criminal history information.



4. How do we use your information?

We use your information to deliver our products and services, manage our business and comply with the law. We also use your information for other reasons, such as to better understand you and your needs, and to tell you about the delivery of the nbn™ access network.

We collect and use your information so we can:

- confirm your identity,
- respond to applications, questions, requests or complaints that you have made to us or that have been passed to us by your internet or telephone service provider(s) or other parties ,
- manage requests for connection to the nbn™ access network, carry out installations, manage the network, check and fix service or connection problems, and improve your experience on the nbn™ access network
- conduct and commission customer experience and market research,
- if you have applied to work with us, assess your application,
- if you work with one of our service delivery partners, manage our relationship with that partner,
- investigate possible fraud and illegal activity,
- comply with laws, including assisting government agencies and law enforcement investigations, and
- manage our business.

Telling you about the nbn™ access network

We are required by law to tell the public about the rollout of the nbn™ access network, including when the network will be available in different areas and when connections to the old network will no longer work. To do this, we send letters to the homes and businesses in an area that are able to connect to the nbn™ access network.

If you have signed up for email updates on the delivery of the nbn™ access network, we will also send you emails about the network. You can opt out of receiving updates at any time by using the 'unsubscribe' link in the updates.

Using data to build a better network and give you better service

We're always working to develop and improve the nbn™ access network and our products and services.

One way we do this is by using new technologies that let us combine information we have with data from other sources, such as third party websites or the Australian Bureau of Statistics.

We also collect information about people that does not identify them, such as website and advertising analytics, and data from service providers.

This helps us learn more about how the nbn™ access network is being or may be used, so we can better design, build and operate the network.

Where we work with partners or service providers to do this, we take steps to ensure that they are required to protect your information.



5. Who do we share your information with?

We share your information with people and organisations for the purposes set out in section 4. We also share information with our service providers and to comply with the law. When we do this, we take steps to keep your information safe.

We share your personal information with other people and companies where we need to for the purposes set out in section 4. This includes sharing:

- with telephone and internet providers that use the **nbn™** access network to provide their services, so they can give you the services you have requested, fix service or connection problems, and improve your experience on the **nbn™** access network with our technicians and service delivery partners, so they can make installations and fix service or connection problems,
- with people that you have asked us to give your information to, such as your authorised representatives or legal advisors,
- if you have applied to work with us, with your previous employers to confirm your work history,
- to comply with laws, and assist government agencies and law enforcement.

We also share personal information with people and organisations that help us with our business, such as professional advisors, IT support, and corporate and administrative services. We only do this where it is necessary for the services to be able to be provided to us. When we do this, we take steps to ensure that our service providers are required to protect your information.

Sending personal information overseas

Some of our service providers are located or operate outside of Australia. Where we need to, we send them information so that they can provide us services. You can find a list of countries where our overseas suppliers are [here](#).

6. Keeping your information safe

We train our staff in how to keep your information safe and secure. We use secure systems and buildings to hold your information. We only keep your information for as long as we need it.

We store the information we collect in secure buildings and systems, or using trusted service providers. Here are some examples of the things we do to protect your information.



Staff training	We train our staff in how to keep your information safe and secure.
System security	We have firewalls, intrusion detection and virus scanning tools to help prevent viruses, malware and unauthorised people accessing our systems. When we send electronic data to other organisations, we take steps to keep your information safe such as using secure networks or encryption.
Services providers and overseas transfers	When we send information overseas or use service providers that handle or store data, we require them to take steps to keep your information safe and use it appropriately.
Building security	We use a mix of ID cards, alarms, cameras, guards and other controls to protect our offices.
Destroying or de-identifying data when no longer required	We aim to keep personal information only for as long as we need for our business or to comply with the law. When we no longer need information, we take reasonable steps to destroy or de-identify it.

7. Accessing, updating and correcting your information

You can ask to see a copy of the personal information that we hold about you, or ask us to update or correct it. Before we give or change your information, we may need to confirm your identity.

You can ask us for a copy of the personal information that we hold about you.

How can you contact us?

See **section 9** for details on how you can contact us.

Is there a fee?

There is no fee to ask for your information. We may charge an access fee to cover the time we spend finding and putting together the information you want. If there's a fee, we'll let you know how much it's likely to be, so you can choose if you want to go ahead.

How long will it take?

We try to make your personal information available within 30 days after you ask us for it. Before we give you this information, we may need to confirm your identity.



Can we refuse to give you access?

In some cases, we can refuse access or only give you access to certain information. For example, we're not able to let you see information that is commercially sensitive. If we refuse access, we'll write to you explaining our decision.

Can you correct or update your information?

You can ask us to correct or update any of your personal information that we have. If we've given the information to another party, you can ask us to let them know it's incorrect. We don't charge a fee for this.

If we don't think the information needs to be corrected, we'll write to let you know why. You can ask us to include a statement that says you believe our record about you is inaccurate, incomplete, misleading or out of date.

8. Making a privacy complaint

If you're concerned about how we've handled your information, let us know and we'll try to fix it. If you're not satisfied with how we handled your complaint, you can contact the Australian Information Commissioner.

How can you make a privacy complaint?

If you are concerned about your privacy or how we've handled your personal information, you can make a complaint and we'll try to fix it.

How do we manage privacy complaints?

We will:

- keep a record of your complaint,
- respond to you within 30 days - if we can't give you a final response in this time, we'll get in touch to tell you why and work out a new timeframe with you.

What else can you do?

If you're not satisfied with how we have managed your complaint, you can ask us to review your complaint. Or you can complain to the Office of the Australian Information Commissioner.

**Office of the Australian
Information Commissioner**
GPO Box 5218
Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au



9. Contact us

To ask us a question about your privacy, ask to access or correct your personal information, make a privacy complaint, or get a printed copy of this Policy, please contact our Privacy Officer.

The Privacy Officer

nbn

Level 11, Arthur Street
NORTH SYDNEY NSW 2060

Email: privacyofficer@nbnco.com.au

If you would like to make a Freedom of Information application, please see the [FOI page on our website](#).

If you need to contact us about something else, including about your nbn™ access network connection, there are several other ways you can get in touch:

Phone: 1800 OUR NBN
(1800 687 626)

Email: info@nbnco.com.au

If you're deaf or hard of hearing, or have difficulty speaking, you can use the **National Relay Service**. Please see the [hearing and translation services page on our website](#).

[end of policy]



Document control

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Policy author	Alun Thomas, Privacy Engagement Manager, Privacy Engagement Team
Policy approver	Kate Mockton, General Manager, Influence and Privacy Engagement/Privacy Officer
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Department or business unit	Security Group

Revision history

Revision	Description	Policy author
8.0	Final – plain English redraft and update	Tim de Sousa
8.1	Amendments request by Privacy and FOI Legal	Alun Thomas
8.2	Annual review - minor amendments to reflect new and current uses	Alun Thomas
9.0	Final version	Alun Thomas