



LEGION TELECOM
PRIVACY POLICY

Updated:
20th November, 2020

Legion Group (Legion, us, we, our) comprises Legion Telecom Pty Ltd, Legion Securities Pty Ltd and Legion Networks Pty Ltd.

This policy outlines our ongoing obligations and commitment to you in respect of how we protect your Personal Information.

Privacy Laws

Legion Telecom adheres to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Federal Privacy Commissioner at www.privacy.gov.au.

Legion Telecom is also subject to laws relating to the protection of personal information. Where Legion Telecom provides telecommunications services, it is subject to privacy obligations under the Telecommunications Act 1997 (Cth).

Legion Telecom' direct marketing activities must also comply with the Do Not Call Register Act 2006 (Cth) and the Spam Act 2010 (Cth).

If Legion Telecom collects health information, it may be required to comply with statutory requirements relating to health records.

Personal Information

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers, bank account or credit card details, password details for accessing Legion Telecom sites or hardware, password details for accessing managed customer equipment or software.

How We Collect Personal Information

Your Personal Information is obtained by means of customer surveys, written correspondence, contact with an Legion Telecom dealer, by telephone or facsimile, by email, via an online process and from nominated third parties.

You may also choose to provide similar details of your authorised representative, such as another family

member, third party service provider or nominated representative. You must ensure that you have obtained the consent of such persons to Legion Telecom collecting and holding their personal information.

Although we collect your Personal Information for the primary purpose of providing our services to you, we may also use your Personal Information for secondary purposes related to the primary purpose. When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

If you do not wish to receive marketing material from us about Legion Telecom events, products and services, you may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

Data Retention Compliance

All telecommunications providers have an obligation to retain certain network data and customer information (called 'metadata') for a period of at least two years for use by criminal law enforcement agencies. Legion Telecom collects and maintains this data for the minimum 2-year period. Further details regarding Data Retention are available at <https://www.ag.gov.au/dataretention>

Why We Collect Personal Information

When you become, or apply to become, an Legion Telecom customer, we collect a range of other information that we need to assess your application and manage your account(s). This purpose of collecting this information is:

- to verify your identity;
- to provide and develop the services that you require;
- to administer and manage those services including charging, billing, obtaining payment, fault management, complaint handling and debt collection;
- to communicate with you directly, via email, fax, phone, SMS and by other means of communication about service usage, service charges, events, marketing material, Legion Telecom products and services, complaint and fault management, and other ways the service provided to you could be improved;

- information relating to the ownership of a property for the installation of network equipment or hardware;
- information about any medical conditions that may require consideration in providing of a service;
- to conduct appropriate checks for credit worthiness and for fraud;
- as required or authorised by law (including under the Telecommunications (Interception and Access) Act 1979 (Cth) and the Telecommunications Act 1997 (Cth);
- as required by or in accordance with any mandatory industry code or standard registered under the Telecommunications Act 1997 (Cth); and
- to comply with requests for information issued to Legion Telecom by agencies and courts that are entitled to obtain the information under Australian law.

Sensitive Information

Sensitive information is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- for the primary purpose for which it was obtained
- for a secondary purpose that is directly related to the primary purpose
- with your consent; or as required or authorised by law.

Third Parties

Where reasonable we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- to service providers who provide services to us, such as providers of telecommunications services;
- to credit reporting agencies;
- to third parties where you have given consent to the disclosure; and

- to government, law enforcement and national security agencies and regulatory bodies where this is necessary for us to comply with our legal obligations.

Disclosure of Personal Information to Overseas Recipients

Legion Telecom may disclose some information to persons or organisations outside Australia. Where required, we will take reasonable steps to ensure that overseas organisations do not breach the Privacy Principles.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. We use a combination of digital security, technical controls and internal processes to keep your information secure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.

While some information is collected in hard copy, most of the Personal Information we collect is or will be stored in secure electronic databases which will be kept by us for a minimum of 7 years.

Access to your Personal Information

You may access the Personal Information we hold about you to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Legion Telecom will not charge any fee for your access request, but may charge an administrative fee for providing information that requires complex or detailed searching or for a hard copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If any of your details change you can contact us via details below to review and update your information. There is no charge to submit a request to update your information.

Policy Updates

This Policy may change from time to time and is available on our website www.legiontelecom.com.au.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about privacy, please contact our Privacy Offer at:

Attn: Policy Officer
Online www.legiontelecom.com.au
Email: support@legiontelecom.com.au
Phone: 1300 534 466

If you make a complaint about privacy, we will acknowledge receipt of your complaint and try to investigate and respond within 30 days.

You can also lodge a complaint with a relevant regulator such as:

- Telecommunications Industry Ombudsman
www.tio.com.au
- Office of the Australian Information Commissioner
www.oaic.gov.au