

PRIVACY POLICY

1 PURPOSE

This policy outlines how Ellis Air Connect manages personal information in compliance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs), the National Energy Retail Law (NERL), and National Energy Retail Rules (NERR).

2 SCOPE

This policy applies to all customers, employees, contractors, and third parties interacting with Ellis Air Connect and whose personal information is collected, used, or stored.

3 POLICY STATEMENT

Ellis Air Connect is committed to protecting personal and sensitive information in accordance with applicable privacy laws and industry-specific regulatory obligations.

4 COLLECTION OF PERSONAL INFORMATION

We collect personal information when:

- You sign up for energy services
- You contact us with a complaint or enquiry
- You provide feedback or interact with our website, portals, or customer support
- Required under our regulatory obligations (e.g., AER, ESC, NERR)

Types of information collected include name, contact details, billing and usage history, identification, concession or hardship eligibility, and other data as needed for service provision

5 OUR OBLIGATIONS

We are required to comply with the APPs in the Privacy Act. They regulate the manner in which personal information is handled throughout, from collection to use and disclosure, security, accessibility and disposal. We are also required to comply with more specific privacy legislation such as:

- Part IIIA of the Privacy Act and the Credit Reporting Privacy Code when we collect and handle credit-related personal information;
- applicable State and Territory health privacy legislation when we collect and handle health information in the relevant jurisdiction; and
- the Spam Act and the Do Not Call Register Act.

6 SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include 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 where required or authorised by law.

We only collect, hold, use and disclose personal or sensitive information for purposes explained at the time of collection:

- which are required or authorised by law; and
- for which you have provided your consent.

7 THIRD PARTIES

Where reasonable and practicable to do so, 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.

8 USE AND DISCLOSURE OF INFORMATION

We use your information to:

- Provide energy and billing services
- Handle complaints and disputes
- Offer relevant updates or marketing (with your consent)
- Comply with legal obligations under energy laws

We will not disclose your information to third parties without consent unless required or authorised by law.

8.1 Notifiable Data Breach Response

In the event of a data breach likely to cause serious harm, Ellis Air Connect will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in accordance with the Notifiable Data Breaches scheme under the *Privacy Act 1988*. We will also advise you of remedial actions taken.

9 STORAGE AND SECURITY

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

Personal data is retained for a minimum of 7 years or as required by applicable legislation and destroyed or de-identified when no longer needed.

10 ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You may request access to your personal information or request corrections if you believe the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading.

We may require identity verification before processing your request.

10.1 Your Rights Under Energy Regulations

Under the *National Energy Retail Rules* (Rules 56–56C), small energy customers have the right to:

- Access metering data and historical billing records
- Appoint a customer authorised representative to obtain information on their behalf
- Be informed of the timeframes for meter installations or service changes

Ellis Air Connect supports these rights and will ensure the requested information is provided promptly and clearly.

11 CONSENT AND MARKETING

We may use your contact information to send you updates or promotional materials if you have consented to receive them.

You can opt out at any time by contacting us or using the unsubscribe option in electronic communications.

11.1 Explicit Informed Consent (EIC)

In accordance with the *National Energy Retail Law and Rules* (Rules 38–41), Ellis Air Connect will obtain explicit informed consent from energy customers before:

- Transferring a customer to a new energy plan or contract
- Disclosing personal, usage, or financial information to a third party
- Setting up direct debit arrangements

This consent will be recorded and retained in accordance with applicable legislation and industry guidelines.

12 FAMILY VIOLENCE PROTECTIONS

Ellis Air Connect recognises the need to protect the safety and privacy of customers affected by family violence. In accordance with *Rule 76G* of the *National Energy Retail Rules*:

- Personal information (including location, billing, and contact details) of affected customers will not be disclosed without their express consent
- Customers may nominate secure methods of communication or account contact preferences
- No documentary evidence (e.g., court orders) is required for customers to receive protections

Our staff are trained to respond with sensitivity and confidentiality. Affected customers may contact us via a secure method to access tailored support.

13 COMPLAINTS AND DISPUTES

If you have any queries or complaints about our Privacy Policy, please contact us at:

Email: support@ellisairconnect.com.au

Tel: 1300 236 906

Complaints are managed in accordance with our Complaint Handling and Dispute Resolution Procedure.

If you are not satisfied with our response, you may contact:

- **Office of the Australian Information Commissioner (OAIC)** – www.oaic.gov.au
- **Energy and Water Ombudsman** – applicable in your state or territory

14 RECORD KEEPING OF CONSENT AND COMPLAINTS

Ellis Air Connect maintains records of customer consent (including EIC) and complaint handling for a minimum of 7 years, or as required by regulatory authorities, including the AER and ESC. These records are stored securely and are available for audit or customer access upon request.