

# Privacy Policy

OzGreen Energy Pty Ltd, Revision 1.6

## 1.0 General privacy policy

This privacy policy is intended to help you understand that OzGreen Energy Pty Ltd, TracWater Pty Ltd, Metertrac and TracNet are subsidiaries or brands of Ozgreen Energy Proprietary Limited (ABN: 63144 898 162), hereafter collectively referred to as "Ozgreen Energy", "our", "us", or "we". We collect personal data and endeavour to keep such data secure, and we want you to know about how personal data may be collected by us, our use or processing of personal data, and the choices available to you to update or access your personal data.

This policy applies to all Ozgreen Energy brands, websites (including but not limited to [www.ozgreenenergy.com.au](http://www.ozgreenenergy.com.au), [www.tracwater.com.au](http://www.tracwater.com.au), [www.tracnet.com.au](http://www.tracnet.com.au), and [www.metertrac.com.au](http://www.metertrac.com.au)), mobile or other device applications ("apps"), advertising services, technologies, products, and services (collectively "Services"). The Ozgreen Energy, Tracwater and Metertrac websites are owned and operated by Ozgreen Energy, and Services may be offered by our affiliates and partners on the basis of this policy unless communicated otherwise by our affiliates and partners.

If you have any queries, you can contact our Information Security Officer ("ISO") and team by emailing us at [privacy@ozgreenenergy.com.au](mailto:privacy@ozgreenenergy.com.au).

### 1.1 Information collection and use (general)

We may collect and combine personal data when you use our Services, including as follows:

#### 1.1.1. Information you provide to us

- a. You create an account with us or purchase any of our Services.  
(Please note that we may recognise you or your devices when you use our Services even if you are not signed in, as we may use cookies, device identification, and other signals, including information obtained from third parties to associate accounts and/or devices with you.

We keep personal information about our users to complete a customer's order, respond to customer service requests, administer the account and products, assess the needs of a business or individual to determine suitable products and protect us against fraud and abuse, which may include the following information:

- Name
- Address
- Telephone Number
- Email Address
- Username & Password

- Credit card details (if applicable)
  - Business/entity/organisation details and identification
  - Account number
  - Invoice number
  - When Services will expire and/or were purchased/renewed
  - Information requests
  - Customer service requests which may include notes or details explaining what you asked or what response you received
  - Other data that may identify you
- b. You use our Services to communicate with others, or upload, or store any data content (such as remote device data). Alarms and alert messaging services and attachments, comments, photographs, audio and video).
- c. You complete contact forms or request newsletters or other information from us. Typically, this will be via email, live chat, or via our website.
- d. You participate in any contest, promotion, survey, or activity we promote that might require information about you.
- e. You submit an enquiry, expression of interest, application for a job or otherwise wish to work with us.
- f. We (including our agents, representatives, and staff) receive an enquiry involving customer support, technical support, billing and account-related support, compliance and legal issues, or media, including if you seek our assistance.
- g. We store and analyse any data or communication content, including email content from incoming and outgoing mail, in order to personalise, develop, and/or provide relevant content, features, and Services.
- h. You otherwise use our Services, including to view content or install any software we make available.

### **1.1.2 Information from analytics, cookies, tracking, and similar technologies**

We may collect information from data collection technologies to allow us to understand your activity on and off our Services, to collect and store information when you interact with Services we offer to partners, and to analyse and improve the performance of our Services.

Such information:

- A. Is collected when you access websites, interactive widgets, applications, and other products (both on and off of our Services) where our data collection technologies (such as cookies, development tools, and other technologies) are present.
- B. collected from your devices (including portable and non-portable computers, mobile phones, and tablets) that may include:
  - i) Device-specific identifiers and information such as:
    1. browser configuration, plugins, and version(s)
    2. cookie information
    3. device settings
    4. Internet Protocol (IP) addresses
    5. location information or data capable of being used to approximate location
    6. metadata
    7. mobile device and advertising identifiers
    8. mobile network information
    9. operating system type and version
    10. software data
  - ii) Other information that allows us to recognise your activity across other devices and Services to provide you with personalised experiences and advertising across the devices you use. Consequently, the information we collect may include how you interact with our Services and those of our third-party partners.
- C. Includes data about usage of services (such as language preferences, log files, and metadata) as well as browsing behaviour and analytics such as the following:
  1. the type of data content shown to you and your level of engagement (including links clicked)
  2. the duration and frequency of your activities
  3. the apps or websites you used immediately before and/or after accessing our Services

### **1.1.3 Information from third parties**

We may collect information about you when we receive it from other users, third parties, and affiliates, which we may use to analyse, expand, or update the accuracy of our records, identify new customers, and provide Services that may be of interest to you. Such information may be received:

- a) When you connect your account to third-party services or sign in using a website
- b) From publicly available sources
- c) When we obtain information from third parties or other companies, such as those that use our Services. This may include your activity on other sites and

apps as well as information those third-parties provide to you or us about their products or services.

## **1.2. Use of information**

Our website and mobile applications may contain links to third-party websites. We are not responsible for the privacy practices or the content of third-party sites, and as such, we encourage you to read the privacy policy of any website you visit.

We combine and use information we have about you (including such information collected through and outside of our Services) for the following purposes:

### **1.2.1 Providing, developing, enhancing and improving Services we may offer or provide to you, such as:**

- Provisioning, activating, setting up and maintaining of Services and features related to the respective Services.
- Improving, maintaining, and optimising the content, operation, and performances of our websites, mobile applications, social media pages, and Services.
- Minimising the occurrence of fraud or abuse of our Services.
- Identifying areas of improvement, possible or required enhancements to Services, errors, and any security risks.
- Analysing your interaction with our Services, your content and other information (such as emails, instant messages, attachments, and other communications), and your interests.
- Associating your activity across our Services and your different devices as well as associating any accounts you may use across our Services.
- Carrying out or supporting promotions.
- Conducting research or supporting innovation.
- Collecting statistics about the overall use of our Services.

This information relates to your purchase, use, and interaction with our Services, and usually consists of data that is aggregated or statistical about how customers use our Services. This information is not usually linked to personal information, but we treat the information as personal to the extent that it is linked to personal information.

### **1.2.2 Contacting you ourselves or through a third-party service provider regarding our Services via email, text messages (such as SMS messages), telephone calls, and automated calls or messages, including when:**

- Communicating regarding Services you have signed up for or purchased.
- Communicating offers for additional Services that we think you may value if you consent or to the extent allowed based upon legitimate interests. You are not required to consent in order to purchase Services from us.

Your communication preferences can be updated with respect to receiving communications from us and/or our partners after signing into your Account Manager.

### **1.2.3 Transferring your information to another country, such as:**

- If Services are provided to a country other than where our servers are located, your communications with us may result in transferring your personal information across international borders.
- When you contact us by email, telephone, or through our website (such as online chat), we may provide you with support from a location outside of your country of origin.

Regardless of the country where you reside, you authorise us to transfer, process, store and use your information in countries other than your own in accordance with this Privacy Policy and to provide you with Services. Some of these countries may not have the same data protection safeguards as the country where you reside.

### **1.2.4 Legal, regulatory, law enforcement, and other purposes for which we may access, preserve and disclose information to investigate, prevent, or take action in connection with:**

- Legal process and legal requests, including subpoena requests, Court orders, and when required by government or government agencies, law enforcement officials, and Courts, tribunals, and other judicial or quasi-judicial bodies to such extent (if any) that we determine in our sole discretion notwithstanding the jurisdiction from which said requirement is imposed.
- Enforcing our Policies and Agreements.
- Allegations or claims that any content violates the rights of third-parties.
- Suspected activity that is unlawful, illegal, or unethical.
- Requests for customer service.
- Technical issues.

- Protecting the rights, property or personal safety of us, our users or the public, including to lessen or prevent a serious and imminent threat to an individual's life or health.
- Establishing or exercising our legal rights or defending against legal claims.
- A request by you to provide you with a copy of your information or to delete your information in accordance with this policy.
- Otherwise complying as required by law.

**1.2.5 Sharing your information with third parties we trust and subsidiaries within OzGreen Energy, including its personnel, officers, and agents, for them to provide Services or act on our behalf, such as:**

- Processing payments.
- Customer service, including to address your requests, and for managing our relationships.
- Contacting you with marketing information, contests, or surveys.
- Advertising, location-based Services, search results, and other content consistent with your location settings.
- A new owner if the ownership or control of any entity or business within OzGreen Energy changes as a result of a merger, acquisition, or sale of assets. This may amount to a complete transfer of the information rather than just sharing the information.

We do not share your personal information for a third party to provide any products or services outside of those requested or as needed on our behalf. These third parties (including subcontractors) would be subject to strict policies or agreements, in that they are prohibited from keeping, processing, sharing, or using your personal information for any purpose other than as they have been specifically contracted for (or without your consent).

**1.2.6 Sharing your information with non-affiliated companies who provide us with advertising, analytics, and business support.**

We may share aggregate information with partners, such as publishers, advertisers, measurement analytics, apps, or other companies. For example, we may share information as to the performance or report on key metrics and statistics related to said activity.

We do not share information that personally identifies you (personally identifiable information is information like your name or email address) with such partners.

When you use third-party apps, websites or other products integrated with our Services, they may collect information about your activities subject to their own terms and privacy policies. The information collected does not include certain personal data such as name, address, billing information, etc., but may be transmitted to and stored by these service partners on servers in a country other than the country in which you reside. or in which we operate.

### **1.3. Deleting or obtaining a copy of information**

You can contact us to request a copy of your personal information or delete your information by emailing our Information Security Officer at [privacy@ozgreenenergy.com.au](mailto:privacy@ozgreenenergy.com.au). The Privacy Officer shall attend to your request on a confidential basis within thirty (30) days of the request being received. Any request for deletion will only be undertaken to the extent that it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements worldwide.

Access of your personal information may be refused if:

- Providing access would pose a serious and imminent threat to life or health of a person.
- Providing access would create an unreasonable impact on the privacy of others.
- The request is frivolous and vexatious.
- Denial of access is authorised or required by law.

#### **1.3.1 Information Security, Storage, and Retention**

We will endeavour to keep your personal information as secure as reasonably possible. Without limitation, registration information is not accessible over the Internet, but only from a secure password-protected internal workstation. Our Internet servers utilise a modern Linux-based operating system that is maintained with the latest available security patches and updates.

The security of your personal information is important to us. When you enter sensitive information (such as a credit card number) on our order forms, we encrypt the transmission of that information using Transport Layer Security (TLS), the successor to Secure Sockets Layer (SSL).

We follow the strict standards set out by the Payment Card Industry (PCI) Security Standard to store and protect the personal data we collect, both during transmission and once we receive it. We also adhere to ISO 27001 in the adoption of a business-wide Information

Security Management System (ISMS) to ensure information security is at the forefront of all aspects of business operations. However, as no method of transmission over the Internet, or method of electronic storage, is 100% secure, we cannot guarantee its absolute security. If you have any questions about security on our website, you can contact us at [privacy@ozgreenenergy.com.au](mailto:privacy@ozgreenenergy.com.au).

We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate, legal, or business purposes.

These might include retention periods of up to six (6) years:

- mandated by law, contract or similar obligations applicable to our global business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights, and/or resolving disputes; or
- needed to maintain adequate and accurate business and financial records.

If you have any questions about the security or retention of your personal data, you can contact our Information Security Officer at [privacy@ozgreenenergy.com.au](mailto:privacy@ozgreenenergy.com.au).

## 1.4 Information Quality

We will use all reasonable endeavours to ensure the accuracy and quality of the information collected about you. If your personal information changes, or if you no longer desire our service, you may correct, update, amend, or deactivate your account by emailing us at [admin@ozgreenenergy.com.au](mailto:admin@ozgreenenergy.com.au).

Alternatively, you can contact us via other avenues specified on our website's 'Contact Us' pages. Should personal information that you know has been collected about you change, it is your responsibility to bring the changes to our attention.

## 1.5 Tracking technologies

We may use cookies to remember users' settings and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

We, and/or our partners, affiliates, or analytics or service providers, may use tracking technologies such as cookies, beacons, tags, and scripts to analyse trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies from these companies on an individual or aggregated basis.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We do link this automatically collected data to personal information. IP addresses are tied to personal information for the purposes of logging site actions (updating information, buying products, etc.) so that in the event of a bug or a dispute, we can review the actions taken that led to the outcome and attempt to reproduce the issues.

Some browsers allow you to automatically notify websites you visit not to track you using a "Do Not Track" signal.

There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track", you may wish to visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

## **1.6 Behavioural targeting**

We may partner with a third-party ad network to either display advertising on our website or to manage our advertising on other sites. Our ad network partner may use cookies and Web beacons to collect non-personal information about your activities on this and other websites to provide you targeted advertising based upon your interests.

## **1.7 Sensitive information**

We will not collect information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or details of health, disability, or sexual activity or orientation, unless compelled to do so by law.

## **1.8 Social media widgets**

Our website may include Social Media Features, such as the Facebook 'Like' button and Widgets, the 'Share this' button or interactive mini-programs that run on our website. These Features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy policy of the company providing it.

## **1.9 Import contacts**

You can import contacts from your email account address book(s) to invite your contacts to join our website. We collect the username and password for the email account(s) from which you wish to import contacts, and we will only use your username(s) and password(s) for the purpose of importing contacts.

## 1.10 Use of non-personal information

You acknowledge and agree that any testimonials or feedback you provide to us may be used for training and/or marketing purposes. We reserve the right to use any testimonials or feedback for any purpose at our sole discretion. You acknowledge and agree that any feedback you provide may be shared with third parties via social media and associated programs.

You acknowledge that you relinquish any proprietary rights you may hold over information, data, or opinions that you provide to us by way of a testimonial, complaint, or feedback.

If you wish to update or delete your testimonial or feedback, you can contact us at [privacy@ozgreenenergy.com.au](mailto:privacy@ozgreenenergy.com.au).

## 1.11 Changes to this policy

We reserve the right to modify our Privacy Policy to reflect changes to our practices at any time. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## 1.12 Contact us

If you have questions about this Privacy Policy, our privacy practices, or our Services, you may contact our Information Security Officer and other representatives by email at [privacy@ozgreenenergy.com.au](mailto:privacy@ozgreenenergy.com.au). We endeavour to respond to all requests, enquiries, and concerns within thirty (30) days of receipt.

General enquiries may also be directed to:

OzGreen Energy Pty Ltd (ABN: 63144 898 162)  
Unit 2, 55 Newheath Drive, Arundel, QLD 4214  
Within Australia, Tel: 1300 503 639  
International Tel: +61 415 585 616  
Email: [info@tracwater.com.au](mailto:info@tracwater.com.au)