

Privacy Policy

As this Privacy Policy relates to your personal information, it is important that you read it carefully.

This privacy policy explains how Hubify Communications (**Hubify**) and its related companies (including **United Networks, Vokal, Symmetry, C3 Innovations, NextCom, Red Telecom** and any other brands and entities that are notified from time to time) collect, use and protect the privacy of your personal information.

Upon acceptance of this Privacy Policy, you consent to our use of your personal information in the manner described herein. You may withdraw that consent at any time by informing us in writing. Please see our contact details below.

We will regularly review the effectiveness of this policy to ensure it is achieving its stated objectives.

1. Scope of our Privacy Policy

During the course of our activities we collect, store and process personal information about our staff, suppliers, partners, clients and our clients' customers. We are committed to ensuring that your personal information is treated in an appropriate and lawful manner.

Hubify is based in Australia, however, we also have operations in several other countries and our products and services are also available for purchase globally. This Privacy Policy aims to establish a uniform minimum standard which applies to all employees, contractors, sub-contractors and consultants and business partners of Hubify who handle your personal information, irrespective of where they are based.

All personal information collected by us will be treated in accordance with the Australian Privacy Principles (**APPs**) as contained in the *Privacy Act 1988* (Cth) and the General Data Protection Regulations that are in force in the European Union (collectively '**the Regulations**'). The Regulations detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

This Privacy Policy may change from time to time particularly as new industry codes are introduced and as the Regulations are amended. Any changes to this policy will be posted on our website.

2. When does this Privacy Policy apply?

This policy applies to the collection and processing of personal information.

2.1 What is 'personal information'?

'Personal information' is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not. Information where we have removed any reference to a person, so that the person cannot be reasonably identifiable from the information, is not personal information.



The kinds of personal information that we collect and hold from you may include:

- contact information, such as your name, postal address and e-mail address;
- member account information such as username and password;
- bank account, credit card information and other financial information; and
- any other personal information submitted to us by you.

2.2 What is processing?

Any activity involving personal information will fall within the scope of 'processing'. This includes obtaining, recording, holding, using, disclosing, hosting, examining, viewing or deleting personal information.

2.3 Obligations concerning your personal information

You have no obligation to provide to us your personal information, and you generally have the right to remain anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

For the purposes of acquiring our products/services the use of your true identity will be necessary.

3. Why we collect personal information?

3.1 Our functions and activities

Hubify is required to collect your personal information to legally provide you with telecommunications services and products.

In providing you with telecommunications services and products that predominantly relate to international travel, we are also able to provide you with a variety of associated services, including:

- Market relevant products and services to you to assist during your travels;
- Detect and investigate fraudulent and criminal activity in relation to your accounts;
- Address service disruption; and
- Advise you with respect to emergency events in your area of travel if and when we become aware of such events.

In providing these services and products we may use your personal information to:

- Contact you about:
 - our products and services (including those offered by our subsidiaries);
 - fraudulent and criminal activity; and
 - service disruptions and emergencies;
- Undertake market/product analysis and development;
- Make efforts to prevent fraud and other criminal activity in relation to your accounts;
- Enable our partners and relevant third parties to contact you (see section 8)
- Carrying out credit checks, credit reporting and debt recovery functions.

In the event that our functions and activities change, we will email you to advise you of the change. Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.



The legal basis we rely upon to legally permit us to process your personal data includes the following:

- (a) you have given us consent for the processing of your data as part of acquiring the telecommunications products and services; and/or
- (b) the processing is necessary for the performance of a contract to which you are a party or you have requested us to take the necessary steps so you can become a party to a contract.

3.2 Marketing of products and services

We may use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. If you would rather not receive communications about our latest products and services, you can opt-out by clicking on the unsubscribe link at the bottom of our emails. You can also contact us over the phone through the details provided at the end of this document. Please be aware that we will still need to send you essential information about your account, and/or changes to your service or plan.

We will not sell your personal information to other organisations outside the United Network group of companies (which include our subsidiaries). However, either we or our partners are entitled to offer you products or services where we reasonably believe that they could be of interest or benefit to you.

4. What personal information do we collect?

4.1 Personal information directly related to our services

The amount and type of personal information that we collect and hold about you depends on the dealings you have with us and may include:

- your name;
- age;
- date of birth;
- contact details such as phone, fax, email address and address;
- information necessary for the payment of your products or services;
- transactional and behavioral information in relation to products and services; and
- records of your interactions with us regarding any call or message made or received through our services.

When we conduct market research, we may also ask you for your opinion about products, services or staff. We treat these opinions as personal information.

In the case of businesses, we may ask for information about the company, department or association making the purchase or setting up the account, the company and contact person details and the names of all directors, officers and if applicable senior management and employees.

4.2 Sensitive Information

Most data protection regimes place restrictions on collecting sensitive personal information about you (this includes information about your religious views, ethnicity, political opinions, criminal records, or sexual preferences).



Generally, we will not collect this sort of information unless needed to provide you with a specific product or service and only if it is provided with your consent.

5. How we collect your personal information?

We will collect personal information directly from you or your legally nominated representative once appropriate consent has been provided. We may do this through application forms, over the telephone, the internet, via your correspondences, or in person when you visit our offices. We may also access information which is publically available.

When you use our telecommunication products or services, we will keep a record of your calls, SMS and data usage. This information will be used to maintain the products and services that we offer to you.

6. How we process your personal information?

6.1 Our processing principles

We take great care in ensuring that your personal information is processed fairly and lawfully, based on the following principles:

- Obtaining your consent to process your personal information in accordance with specified purposes;
- If it becomes necessary to change the purpose for which the personal information is processed, you will be informed of the new purpose before any processing occurs;
- The personal information must be adequate, relevant and not excessive for the purposes for which it was collected;
- Personal information must be kept accurate and up to date;
- Personal information must not be kept for longer than is necessary and will be destroyed or erased from our systems when it is no longer required, unless there is a legal obligation for us to retain it;
- Personal information will be processed subject to your rights, which include the right to:
 - request access to any of your personal information held by us;
 - prevent the processing of your personal information for direct-marketing purposes;
 - ask to have inaccurate personal information amended;
 - prevent processing that is likely to cause damage or distress to you or anyone else.

Where we do not obtain consent to process your personal information then there may be other provisions on which we can rely to show that we are processing information fairly and lawfully. This includes situations where the processing satisfies a legal obligation.

6.2 Website information & Cookies

Each time you visit our websites, anonymous navigation information is collected by our servers. This information includes:

- The type of browser and operating system you are using;
- The address of the referring site and the website you leave our site to visit;
- The date and time of your visit;
- Your server's IP address (a number which is unique to the machine);
- The address of the pages you accessed.



This provides us with information about how the website is used and navigated, including the number of hits, the frequency of visits and the duration of visits to each web page on the site. Although this information does not personally identify you, it does constitute your personal information which we may collect.

In addition, our websites, like many others, uses “cookies”. A cookie is a piece of information that the website sends to your browser and which is stored on your hard disk. A cookie helps to identify your browser to the website when you return to visit the site and identifies the previous requests your browser has made. This allows the site to be tailored to you on your return visits. Cookies cannot identify you personally, but as with the website information, it does constitute your personal information which we may collect.

If you do not wish to receive cookies it is likely that you can disable their use by altering the security settings on your web browser however, this may impede your ability to use parts of the website. Your web browser might also contain a mechanism that warns you that a site you are visiting makes use of cookies.

While our website may contain links to other websites owned by third parties, those websites are not subject to our privacy standards, policies and procedures. We recommend that you make your own enquires as to the privacy policies of these third parties and we are in no way responsible for the privacy practices of these third parties.

6.3 Location-Based Information and services

We may collect information relating to your general location based on:

- Information you manually provide;
- Information emitted by your telephone;
- Information that you provide to a social media provider regarding your location;
- The IP address of your telephone or computer;
- Global Positioning System (GPS) information sent to us by your device; and
- The proximity of your personal communication device to the nearest radio tower or cell site.

We may collect this form of personal information to:

- contact you in the event of an emergency using metadata collected by us;
- verify the information you provide manually;
- provide you with location-based content and location marketing; and
- associate personally identifiable information with location-based information provided by you or your personal communication device solely for our internal use and to improve your experience with the products.

If you have agreed to marketing and promotions through geo-marketing, you allow us to use your location to market offers to you. You may choose to withdraw your consent at any time by opting out of location marketing in your ‘My Account’ settings.

6.4 Analytical use of personal information

We use a range of tools provided by third parties, including Google Analytics, Bing and other service providers including our web hosting company, to analyse personal information and data. These sites and providers have their own privacy policies which we deem acceptable.



We use your personal information regarding your travel behaviour to better understand how people use our products and services and to offer location specific products to you. To that end, we may use aggregated, traffic behaviour, along with information from third parties to track usage trends and thereby improve our services.

We may also use aggregated and anonymized information to develop reports that we may share with third party marketing partners and affiliates. Such usage and traffic information includes:

- The date and time you access and use the services;
- Your internet service provider, mobile carrier, or data services provider;
- Your Internet Protocol (IP) address;
- Your physical address at any time;
- The pages you visit;
- The places you physically visit;
- The links you click;
- The features you use;
- How and when you interact with the services;
- The content, images and advertisements you select; and
- How you arrived at the products and where you go when you leave.

7. How do we secure your personal information?

7.1 Technical security provisions

We will use up-to-date techniques and processes, which meet current industry standards, to protect your personal information from misuse, loss and unauthorized access, modification or disclosure. Access to your personal information will usually be limited to United Network's employees, our subsidiaries employees and service providers who need your personal information to provide the services noted herein.

Paper documents are protected from unauthorized access or use through various security systems that we have over our physical premises. We also maintain up-to-date computer and network security systems with appropriate firewalls, encryption technology and passwords to protect electronic copies of personal information.

Your personal information may be stored and processed outside of Australia. When transferring information to others, we ensure that appropriate and suitable safeguards and data protection measures are in place to protect your personal data. We achieve this by implementing contractual clauses that have been approved by the European Commission or we implement other similar measures required by laws around the world.

7.2 Your obligations

You are required to help us to maintain the integrity of your personal information by complying with the security measures designed to protect your personal identification numbers and passwords. These are set out in the terms and conditions of your account. We accept no responsibility for information disclosed to parties who know or use your username or password.

7.3 Breach reporting

If we become aware of a breach with respect to your personal information, we will notify you as soon as practicable and will also notify the appropriate data protection authority in the relevant country.

8. When do we disclose personal information to third parties?



8.1 Transfer to our subsidiaries

Upon receiving your consent, we may share your personal information with other companies within the United Network group of companies, which includes all subsidiaries and related entities of Hubify Ltd. Your information will be transferred exclusively for the purposes described within this Privacy Policy.

Your personal information will be stored in Australia and in the United Kingdom but is also accessible to staff within our group and which are located in Canada, New Zealand, Hong Kong, Malaysia, Singapore, Japan, South Korea and Indonesia.

If permitted by law, we may disclose information collected about you as an asset of the Hubify in conjunction with the purchase and potential purchase of our company or a portion of our assets.

To the extent that our corporate affiliates have access to your information, they will follow practices that are at least as restrictive as the practices described in this Privacy Policy.

8.2 Transfer to third parties

We may provide your personal information to third parties outside the Hubify group of companies for the purposes set out in this policy. These may be located in Australia or overseas. The countries in which these companies are located include the United Kingdom, Italy, India, Malaysia, Canada, Hong Kong, Latvia and countries you are travelling to while using a Hubify product and/or service.

Generally, these are local or overseas third parties that resell, assist, support or facilitate our products or services or the operation of our business. We will keep and maintain a record of all disclosures to third parties.

Third party recipients may include:

- **Our service providers** who provide services or functions on our behalf or to us, including:
 - professional advisors;
 - business and financial service providers and consultants;
 - business analytics and data processing providers;
 - logistics and delivery providers;
 - security providers; and
 - telecommunications and IT service providers.

We may authorize our service providers to collect information on our behalf, including as necessary to provide the service, operate features of our website, or to facilitate the delivery of online advertising tailored to your interests.

- **Your service providers** including but not limited to hotels, airlines, car rental, and activity providers, who fulfil your travel reservations or provide other requested services. Please note that these providers may also contact you as necessary to obtain additional information about you, facilitate your travel reservation or other requested service, or respond to a review you may submit.
- **Business partners, resellers and service providers:**
 - through whom we may jointly offer products or services;
 - whose products or services may be offered on our website or may be facilitated by us; or
 - who sell, market or distribute our products or services.



- **Referring websites** If you were referred to our website from another site (for example, through a link you clicked on another site that directed you to this one), we may share some personal information relating to your use of our website with that referring website.

We will endeavor to ensure that these third parties:

- protect your personal information in accordance with the data protection regimes in which they operate,
- use your personal information in relation to the purposes specified herein; and
- retain your personal information only for as long as they need it.

However, we do not control the privacy practices of these parties. Therefore, we encourage you to review their privacy policies.

8.3 Transfers required by law

We may be required to disclose your personal information to law enforcement agencies, governments or regulatory bodies around the world to:

- assist with their functions or investigations;
- to resolve complaints or disputes;
- for security, customs and immigration purposes; and
- to assist with emergency services and safeguard national security.

9. How can you access the personal information we hold about you?

To request your personal information, please contact our Data Protection Officer using the contact details provided at the end of this document. If you think your personal information may be inaccurate, incomplete or out of date, you can request it to be updated. We may not be able to give you access to information that:

- would reveal personal information about another person;
- would reveal a commercially sensitive decision-making process;
- we are prevented by law from providing to you; or
- relates to existing or anticipated legal proceeding.

We will notify you in writing if we can not give you access to the information and why. We aim to respond to most requests for access within 30 days subject to some exceptions permitted by law. We may charge a fee to cover our reasonable costs of processing your request, locating the information and providing it to you.

10. How do we keep your personal information accurate and up-to-date?

We take all reasonable measures to ensure that the personal information we hold is accurate, complete and up-to-date. However, the accuracy of your information is largely dependent on what you provide us. To ensure that we have your most current and accurate personal information, please contact our Data Protection Officer when your information changes (e.g. if you change your name or move house).

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information.



In most cases, we expect that requests to correct information will be addressed within 30 days of receipt of the request. We will notify you in writing if we can not correct the information and why.

11. Destruction or De-identification

We will retain your personal information whilst it is required for the purpose for which it was collected, for our business functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed.

12. Your rights

In accordance with the Regulations, you have the right to:

- (a) request access and rectification or erasure of personal information;
- (b) restrict processing of your personal information;
- (c) object to processing of your personal information, including on the groups of our legitimate interests;
- (d) object to us sending you direct marketing and profiling you for the purpose of direct marketing;
- (e) in certain circumstances receive your personal information that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from us; and
- (f) lodge a complaint regarding our processing of your personal information with a relevant authority in a country where you live, work, or where you believe a breach may have occurred.

13. What if you have a concern or complaint?

We have put in place a way of dealing with issues you might raise quickly and fairly. Please raise your complaints with any of our Data Protection Officer as per the contact details below.

We aim to resolve your complaints within 48 hours. If the matter is more complex and our investigation may take longer, we will contact you and tell you when we expect to provide our response.

If you are dissatisfied with the outcome of a complaint, or you require further information on privacy in Australia you may contact the Office of the Australian Information Commissioner by visiting their website at <http://www.oaic.gov.au>

Contact Details:

Hubify Communications: Suite 1.03, 6-10 Talavera Rd, Macquarie Park NSW 2113
Phone: 1300 482 439
Email: info@hubify.com.au

