



Privacy Policy

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PRIVACY POLICY

Policy Background

LPA Energy Group (LPA) is committed to providing quality services and this policy outlines our ongoing obligations in respect of how we manage Personal Information.

LPA complies with the Australian state and commonwealth privacy laws including the Privacy Act 1988 (Cth) and the Australian Privacy Principles (collectively, "Privacy Laws")

We have adopted 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, secure and dispose of your Personal Information.

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

This Privacy Policy summarises how LPA handles personal information with respect to:

- a) any official LPA website, web/cloud-based application ("Website") including any forms on the Website;
- b) any software used to provide the Website; and
- c) any services provided by or to a User through the Website.

LPA will respect and keep secure all personal and sensitive information provided to LPA by client and users of its Platform in accordance with applicable privacy laws and this Privacy Policy.

What is Personal Information and why do we collect it?

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.

This Personal Information is obtained in many ways including correspondence, by telephone and email, via our website, from your website, from media and publications, from other publicly available sources.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

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.

The type of information LPA collect may include a User/User's:

- a) business' account details
- b) personal name
- c) age
- d) gender
- e) residential/work address
- f) email addresses
- g) telephone number

- h) photographs
- i) physical location
- j) hardware/browser/software used to access the Platform
- k) IP addresses

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:

- a) For the primary purpose for which it was obtained
- b) For a secondary purpose that is directly related to the primary purpose
- c) With your consent, or where required or authorised by law.

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.

How LPA collects and holds personal information

Where possible, LPA will collect a User's personal information directly from a User, but information may also be collected via:

- a) IP loggers
- b) Social media
- c) Website cookies
- d) Newsletter subscription
- e) Wi-Fi routers and
- f) GPS devices

Personal and sensitive information may be collected from a User when a User provides it to LPA directly.

LPA has established appropriate physical, electronic and managerial procedures to safeguard any information LPA collects. This helps prevent unauthorised access, maintains data accuracy, and ensures that the information is used correctly.

All data transferred to and from LPA's servers is encrypted and a firewall is in place to prevent intrusion. All data stored within LPA's systems is designed to only be able to be accessed by authorised LPA officers, employees, contractors, and the relevant hosting facility.

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification, or disclosure.

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.

However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Cross-border disclosures of a User's personal information

LPA does currently use off-shore service providers with regard to storage of personal information data including email services, support service and telephonic services. LPA reserves the right to use data hosting facilities and third-party service providers both in Australia and overseas to assist LPA with providing our goods and services.

The purposes for which LPA collects, holds, uses, and discloses personal information.

LPA collects personal information that LPA considers relevant for the purpose of providing LPA's services or the Platform. LPA will not use or disclose personal information collected about an individual for the purposes of direct marketing unless the individual has given LPA consent to do so. LPA will not disclose any personal information to any third-party overseas recipients unless the individual has given LPA consent to do so.

Some of the ways LPA uses personal information includes to:

- a) communicate with a User and others as part of LPA's business
- b) enable LPA to provide a product
- c) personalise a User's LPA user experience
- d) send a User information regarding changes to LPA's policies, other terms and conditions, on-line services and other administrative issues
- e) manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, collecting debts and market or client satisfaction research)
- f) prevent, detect, and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks
- g) verify information given to LPA
- h) carry out market research and analysis, including satisfaction surveys
- i) provide marketing information to a User (including information about other products and services offered by selected third party partners) in preferences a User have expressed
- j) manage LPA's infrastructure and business operations and comply with internal policies and procedures, including those relating to auditing accounting billing and collections IT systems data and website hosting business continuity and records, document, and print management
- k) process refunds, replacements, and repairs
- l) resolve complaints and handle requests for data access or correction
- m) comply with applicable laws and regulatory obligations (including laws outside a User's country of residence), such as those relating to anti-money laundering, sanctions and anti-terrorism
- n) comply with legal process and respond to requests from public and governmental authorities (in outside a User's country of residence)
- o) establish and defend legal rights protect LPA's operations or those of any of LPA' group companies or insurance business partners, LPA's rights or property and/or that of LPA' group companies, a User or others and pursue available remedies or limit LPA' damages

To whom does LPA disclose a User's personal information?

LPA may disclose a User's personal information to:

- a) the User
- b) government authorities (where required by law including workers compensation laws)
- c) third parties involved in court action (where required by law)
- d) other parties that provide support services to LPA including support services, merchant services, online marketing programs for the purposes of marketing LPA products only
- e) professional advisers
- f) potential business partners or purchasers

Miscellaneous

Website cookies and usage information

When a User accesses LPA's Platform, LPA may use software embedded in LPA's Platform and LPA may place small data files (or cookies) on a User's computer or other device to collect information about which pages a User's view, how a User reach those pages, what a User does when a User visits a page, the length of time a User remains on the page and how LPA performs in providing content to a User. A cookie does not identify individuals personally, but it does identify computers.

A User can set a User's browser to notify a User when a User receive a cookie and this will provide a User with an opportunity to either accept or reject it in each instance. LPA may gather a User's IP address as part of LPA's business activities and to assist with any operational difficulties or support issues with LPA's services. This information does not identify a User personally.

External links

The Platform may contain links to other websites. When a User accesses these links, LPA recommends that a User read the website owner's privacy statement before disclosing a User's personal information. LPA does not accept responsibility for inappropriate use, collection, storage or disclosure of a User's personal information collected outside LPA's Platform.

Access to your Personal Information

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

LPA Energy Group will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

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

Right to opt out of personal information use

LPA will comply with any request from a User to process or cease using their personal information data as soon as practicable.

Unless a User specifically opts-out of use of personal information for marketing purposes, LPA will assume LPA has a User's implied consent to receive similar information and communications in the future.

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 you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

LPA has obligations to take reasonable steps to correct personal information held by LPA if LPA is satisfied that it is inaccurate, out-of-date, incomplete, irrelevant, or misleading for the purpose for which it is held.

Policy Updates

LPA may revise this Privacy Policy from time to time by updating this page. The revised Privacy Policy will take effect when it is posted on LPA's Website, implemented in the Platform or otherwise communicated to a User. LPA suggests that a User review LPA's Privacy Policy regularly.

Applicable law

This agreement is governed by and construed in accordance with the laws of Victoria, Australia.

The User irrevocably and unconditionally submit to the non-exclusive jurisdiction of the courts of Victoria, Australia.

If any provision of this agreement is found to be invalid or unenforceable by a court of law, such invalidity or unenforceability will not affect the remainder of this agreement, which will continue in full force and effect.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy, please contact us at: dataprivacy@lpaenergygroup.com.