

Privacy Statement

Leading Edge Group Limited



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Privacy Statement – Leading Edge Group Limited

Our commitment to protecting your privacy

Protecting your privacy and the confidentiality of your personal information is fundamental to the way Leading Edge Group Limited (Leading Edge), its affiliates and subsidiaries do business.

Leading Edge is bound by the Privacy Act 1988 (Commonwealth) as amended and the ten National Privacy Principles set out in that Act, and upholds your right to privacy protection in relation to the collection, use, disclosure and handling of personal information.

We have systems and procedures in place to protect your privacy whenever we collect, store, use or disclose your personal information. You can request details about the information a Leading Edge company holds about you and you have a right to ask to correct this information.

We are committed to providing you with the highest levels of customer service including protecting your privacy. Set out below is information that we are required to communicate to our customers. We recommend that you keep this information for future reference.

About us

The Leading Edge Group is an Australian owned buying and promotional support group with over 1500 retail shopfronts throughout Australia and New Zealand. We aspire to be the champion of independent businesses throughout Australia.

Leading Edge Telecoms is an Accredited Enterprise Partner, acting on behalf of Telstra as a Premium Dealer and provides a range of telecommunication solutions. Leading Edge Telecoms is not a service provider, and is not a Carrier.



What is personal information?

Personal information is any information about you that identifies you or information by which your identity can be reasonably identified.

Why do we collect personal information?

Leading Edge collects personal information so that we are able to effectively provide you with goods and services that you require.

What information do we collect?

The type of personal information we collect may include your name, date of birth, current and previous addresses, telephone or mobile phone number, email address, bank account or credit card details, occupation, place of work, other financial details, credit history and driver's licence number. We may also have access to details of your Telstra services (including their status), as well as certain details about your personal interests.

What about sensitive information?

We will not collect, use or disclose sensitive information about you unless it is necessary to provide you with a product or service and we have your consent or, unless we are legally required to collect, use or disclose that information.

Sensitive information, as defined by law, is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.



Your consent to collect personal information

Personal information is usually used or disclosed only after obtaining your consent. Your consent can be express or implied.

Your express consent can be verbal or written. For example, by signing an application, you are giving your express consent.

You imply consent when we can reasonably conclude that you have given consent by some action you take, or when you decide not to take action. For example, if you use our call centre service (either when we call you or you call us) and continue the call after hearing the message telling you that the call may be monitored or recorded for quality assurance purposes, you have given us your implied consent to monitor or record your call.

If you do not consent to certain uses of personal information by Leading Edge, it may not be able to deal with you, or provide you with a particular product or service.

The circumstances where we may use or disclose personal information without your consent are very limited. They include where we are required by law, for the investigation of an offence or for court proceedings.

Do I have to be identified at all?

Whenever it is lawful and practical to do so, you may transact with us without providing personal information. This may however impact on the level of service we can provide to you.

Sharing of your personal information within Leading Edge

For us to service our relationship with you and carry on business as a group, it is important that we have the capacity to share your personal information with other entities within the Leading Edge Group.

We will obtain your consent to share your personal information with other Leading Edge companies and only share that information for the purposes to which you have agreed.



How we collect personal information

We collect most personal information directly from you.

The types of personal information that we may collect will depend on the circumstances of collection and the kind of service that you request from Leading Edge. For example, we may collect some personal information when you visit our websites, deal with us over the telephone, purchase our products and services, fill in an application form, send us a letter, or when you visit us in person.

Occasionally, you may need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them that we can be contacted for further information **(see 'How to contact us' at the end of this document)**.

There may be occasions when we need to source personal information about you from a third party. For example, we may collect personal information from a credit reporting agency, our business partners, third party brokers and government agencies.



How we use your personal information?

We will tell you the purposes for which we intend to use your personal information. We only collect personal information about you that is necessary to provide our services to you, to fulfil administrative functions associated with these services, for example billing, to enter into contracts with you and/or third parties and for marketing and client relationship purposes.

If you choose not to provide certain personal information (e.g. your date of birth), we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

Leading Edge may collect your personal information:

- to verify your identity;
- to assist you to subscribe to a Telstra service;
- to assist in providing information about a product or service;
- to consider your request for a product or service;
- to provide the product or service you require;
- to inform you of ways the services provided to you could be improved;
- to gain an understanding of your information and communication needs in order for us to provide you with a better service;
- to tell you about other products and services that may be of interest to you;
- to administer and manage those products and services, including charging, billing and collecting debts;
- to assist in arrangements with other organisations (such as partners) in relation to the promotion and provision of a product or service;
- to perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, and market or customer satisfaction research);
- to research and develop our services;
- to prevent or investigate any fraud or crime (or a suspected fraud or crime); and
- as required by relevant laws, regulations and Codes of conduct.

We may disclose personal information to third parties when we contract out some of our functions and activities. For example, we may provide names and addresses to courier, a mailing house to mail account statements to you and other customers. In these situations, we prohibit third parties from using your personal information except for the specific purpose for which we supply it.



When we collect your personal information we will give you the option of advising us that if you do not want us or any third party to use the information for any disclosed secondary purpose. You may also at any later date notify us of your preference on this issue by contacting our privacy officer **(see 'How to contact us' at the end of this document)**.

Also, your personal information is collected so that we, our related bodies and our dealers can promote and market services to you (including by way of direct mail, telemarketing, email, SMS and MMS messages). This is to keep you informed of products, services and special offers and may continue after you cease acquiring services from us. If you do not wish us, our related bodies or our dealers to contact you to promote and market products, services and special offers to you, please contact us **(see 'How to contact us' at the end of this document)**.



When we disclose your personal information

In order to deliver the services you require, we may disclose your personal information to organisations outside of Leading Edge. Your personal information is disclosed to these organisations only in relation to us providing our services to you. These organisations may carry out our:

- customer enquiries;
- courier & mailing operations;
- billing and debt-recovery functions;
- information technology services;
- installation, maintenance and repair services;
- marketing, telemarketing and door-knocking services;
- market research; and
- website usage analysis.

We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

In addition, we may disclose your personal information to:

- your authorised representatives or your legal advisers (e.g. when requested by you to do so);
- credit-reporting and fraud-checking agencies;
- credit providers (for credit related purposes such as credit-worthiness, credit rating, credit provision and financing);
- our dealers;
- our related companies;
- our professional advisers, including our accountants, auditors and lawyers;
- other telecommunication and information service providers (for example, if you obtain services from other providers, we may need to disclose your personal information for billing purposes);
- government and regulatory authorities and other organisations, as required or authorised by law; and
- organisations who manage our business and corporate strategies, including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables).



Security of your information

We will take all reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure. We use a variety of physical and electronic security measures including restricting physical access to our offices, firewalls and secure databases.

Correction of information we hold about you

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:

- let us know if there are any errors in your personal information; and
- keep us up-to-date with changes to your personal information such as your name or address.

If you are a subscriber to one of our online products or services, you may change your personal details by using the relevant facility on our websites.

Access to your personal information

You have a right to access your personal information, subject to some exceptions allowed by law. You may be required to put your request in writing for security reasons.

We will on request provide you with access to the personal information we hold about you in accordance with the National Privacy Principles. We reserve the right to recover reasonable costs from you in supplying you with access to this information. If we decline to give you access in certain circumstances we will provide you with reasons for this. To request access, please contact our Privacy Officer (**see 'How to contact us' at the end of this document**).



Online Privacy Issues

To the extent that the other sections of this Privacy Statement apply to online privacy issues, they form part of the terms of use for any website operated by us. This section of the Privacy Statement provides information specifically relating to websites operated by us.

(a) Online collection of personal and aggregated data

We will collect personal information from websites operated by us where you register for email bulletin services, register as a member or purchase goods or services through the website. We will use this information for providing the relevant service to you and in other ways described in this policy.

We may also collect other information when you access a website operated by us - some of this is personal information and some of it is not - to optimise our goods and services including our web pages for your computer. This information will include the identity of your internet browser, the type of operating system you use, your IP address and the domain name of your internet service provider.

This information is aggregated for reporting purposes. Personal identifiable characteristics are removed and users remain anonymous unless you have provided express consent to us to recognise your usage. This data is gathered by us to examine internet trends and demographics and to assist in improving websites operated by us, and may be provided to third parties for marketing and research purposes.

(b) Cookies

To enhance your experience with websites operated by us, many of our web pages use "cookies". Cookies are text files that a website transfers to your computer's hard drive for record keeping purposes. Websites operated by us use cookies to support your current activity on the website by providing a unique identifier in order to allow our web server to distinguish your web browser from any other web browser accessing the website, and to customise the website for you. They also allow us to follow usage patterns and compile data that may help us improve the website and targeting advertising. Cookies by themselves do not tell us your e-mail address or other personal information. However, once you choose to provide the website with personal information this information may be linked to data stored in the cookie.

You should adjust the settings in your web browser if you do not want information collected through the use of cookies. However, this may slow down or restrict access to parts of the website.



(c) Links to other websites

Some of the websites operated by us contain links to third party websites, being advertisers, sponsors or other companies that we have a relationship with. Although a website may be linked to a website operated by us, we are not responsible for the privacy practices of the linked website. Any concern that you may have in relation to privacy policies of a linked third party website should be directed to the operator of that website.

(d) Online disclosures

From time to time we may have relationships with other companies that we allow to place advertisements on web pages of sites operated by us. As a result, when you visit a website operated by us, advertising server companies may collect information such as your domain type, IP address and click-stream information.

(e) Promotional e-mail

If you are receiving promotional e-mail from us and you no longer wish to receive this information, please e-mail us in return and we will ensure that you no longer receive this information.

Resolving your concerns

You are entitled to complain if you believe that your privacy has been compromised. To lodge a complaint please use contact details at: **'How to contact us' at the end of this document.**

We will respond to a complaint as soon as practicable and let you know who is responsible for managing your complaint. We will try to resolve your complaint within 10 working days. When this is not possible, we will contact you within that time to let you know how long it will take to resolve the complaint.



How to contact us

Please contact our Privacy Officer to:

- request access to your personal information, or
- to lodge a complaint concerning the privacy of your personal information, or
- to request more information.

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