

Privacy Policy

'We', 'us' and 'our' refer to RedGrid Internet of Energy Enterprises Pty Ltd ACN 626 675 027 (RedGrid), and its, subsidiaries, related entities and businesses.

Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in schedule 1 of the *Privacy Act 1988* (Cth) and any other relevant law.

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

Personal information

When we refer to **personal information** we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information may include your name, address, date of birth, telephone number, email address and profession or occupation, or other personal information that is obtained through your use of our products or services. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information. Our privacy policy covers all people who use our services or otherwise provide their personal information to us.

By using any product or service offered by us, or by providing your personal information to us, you consent (to the extent that we require your consent under privacy laws to do these things) to RedGrid collecting, using and disclosing your personal information in accordance with this Privacy Policy.

Why we collect your personal information

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of service to you. We collect, hold, use and disclose your personal information for the following purposes:

- to make available RedGrid's applications to you and to our other customers in the best way possible;
- to remotely monitor and/or control the operation of your appliances to assist you to manage your energy consumption efficiently;
- to improve our products and services;
- for communication and administrative purposes;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you;

- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority where we are required by law to do so;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of the RedGrid, its contractors or service providers; and
- to meet obligations of notification to our insurers.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy or as permitted under the *Privacy Act 1988* (Cth).

How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. This is usually in one of the following ways:

- by you completing one of our application or other registration forms; or
- through your access and use of our application or our website.

We may also collect personal information from third parties including:

- information provided on your behalf with your consent;
- digital, internet and application service providers such as Apple, Google and Android;

Do we disclose your personal information?

We may disclose your personal information to:

- our employees, related bodies corporate, contractors or service providers for the purposes of operation of our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation or person for any authorised purpose with your express consent to companies that provide information and infrastructure systems to us.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- the person or organisation has a commitment to protecting your personal information at least equal to our commitment; or
- you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

Direct marketing

From time to time we may use your personal information to provide you with current information about offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by writing to us at info@RedGrid.io.

If the direct marketing is by email you may also use the unsubscribe function. If the direct marketing is by text you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take reasonable steps to meet your request at the earliest possible opportunity.

By using the unsubscribe function in a direct marketing communication you will only unsubscribe from direct marketing from that entity/brand who sent you the communication and method of delivery. Please let us know if you would like to unsubscribe from all direct marketing from RedGrid and related entities. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

Access and correction to your personal information

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information at the time of the request otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

We may need to consult with other others as part of our investigation.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

How safe and secure is your personal information that we hold?

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

Complaints and enquiries

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the *Privacy Act 1988* (Cth), you may contact us by email at info@RedGrid.io.

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you would prefer to make your complaint to an external complaint body, or you are not satisfied with the handling or outcome of the RedGrid complaints process, you may contact the following organisations to lodge a complaint:

Australian Information Commissioner

By telephone: 1300 363 992

By email: enquiries@oaic.gov.au

Online: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

Your use of our Applications

We may collect personal information through our Applications if you voluntarily provide it – for example, if you install and use our Applications, your usage and data derived from that usage will be recorded and provided to us.

When you access or use our Applications, we will keep a record of certain information. We may collect the following information that does not identify you in relation to your use of our Applications: address, the date and time of your usage, device address, the type of internet you use, information about the devices connected to the Applications (including without limitation, energy usage).

Your use of our website

We will only collect personal information through our website if you voluntarily provide it – for example, if you submit information via a web page form or you send us an email.

When you access our website, we will keep a record of your visit. We may collect the following information that does not identify you in relation to your use of our website: your computer address, the date and time of your visit, the type of browser you use, the pages you visit, the information you request and the country from which you request information.

Any personal information you provide to us through our applications or our website will be handled in accordance with the principles described in the preceding sections of this Privacy Policy. We collect this information for commercial and statistical purposes, and to monitor and improve our applications, website and services, as referred to above.

RedGrid cannot ensure that any information transmitted over the internet is secure and you transmit such information at your own risk. However, once we receive a transmission of personal information, we take all reasonable steps to ensure that the information is secure on our systems.

We use cookies

A cookie is a small data file that is stored on your browser or device and allows our computer server to identify your computer or device. This information allows our website content to load and function as intended when you access it and to monitor various statistics on use of our website. Most browsers will allow you to control whether the browser will accept or reject all, or certain, cookies. Further, you should be able to delete most cookies – you should check your browser for instructions on how to do this.

Our website may contain links to third party websites unrelated to RedGrid. This Privacy Policy has no application to third party websites. RedGrid makes no representation regarding, and is not responsible for, the content or the privacy practices of third-party websites and has no knowledge of whether cookies or other tracking devices may be used by those sites.

Further information

You may request further information about the way we manage your personal information by contacting us.

Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this Privacy Policy from time to time or as the need arises and we will publish the updated Privacy Policy here.

You may request this Privacy Policy in an alternative form.

This Privacy Policy came into existence on 5 August 2020.