



Freshtel Holdings Ltd

Privacy Policy

Freshtel Holdings Limited ('Freshtel') is committed to the protection of your personal information. This Privacy Policy applies to Freshtel Holdings Limited and each of its subsidiaries.

Our Privacy Statement contains the following important information:

- National Privacy Principles
- Collection of your personal information
- How we use and disclose your personal information
- Security of your personal information
- How to access, correct or update your personal information
- How to contact us
- Internet privacy

National Privacy Principles

Freshtel is bound by the National Privacy Principles ("NPPs") under the *Commonwealth Privacy Act 1998* ("Privacy Act"). This statement explains how we handle personal information in accordance with the NPPs. The NPPs and this statement do not apply to Freshtel's practices directly related to records about current or former employees and their employment relationship with Freshtel.

The expression "personal information" is used in this statement to refer to information or an opinion, in any form and whether true or not about an individual whose identity is apparent or can reasonably be ascertained from the information.

Collection of your personal information

Freshtel collects personal information so that it can conduct its business. Freshtel's business is the development and marketing of Voice over Internet Protocol (VoIP) telephony products and services. VoIP is a technology that allows voice telephone calls to be made over the internet rather than through traditional telephone networks.

Freshtel collects a broad range of personal information about customers, prospective customers, agents, dealers, contractors, suppliers, service providers and employees. The types of personal information that Freshtel collects depends on how the interaction occurs. For example, your personal information will be collected when you purchase products, fill in an application form or send Freshtel correspondence and it may be collected when you visit this website.

This information may include, but is not limited to, names and contact details, date of

birth, place or work, credit history and other financial details.

When Freshtel collects *personal information* directly from you, it will take reasonable steps at or before the time of collection to ensure that the person supplying the information is aware of certain key matters, such as the purposes for which we are collecting the information, the organizations (or types of organisations) to which we would normally disclose information of that kind, the fact that you are able to access the information and how to contact it (or example, where *personal information* is collected on a form, it will generally include a written privacy statement on the form which sets out these details).

Freshtel will collect your personal information directly from the person to whom the information relates where it is reasonable and practicable to do so. Where Freshtel collects information from a third party, it will still take reasonable steps to ensure that you are made aware of the details set out above.

How Freshtel uses and disclose personal information

The personal information that is provided to Freshtel, is used to provide you with better service for the supply of our products and services to you. For example, the information we gather from your use of this web site enables us to provide more user friendly products and services.

Freshtel will not sell, rent, trade or disclose your personal information without your consent unless required to do so by law or in the circumstances listed below. Freshtel will only use and disclose information for the purpose for which that information was given to it. We may use and disclose personal information about you for a purpose (the "secondary purpose") other than the main purpose for which you gave us the information (the "primary purpose") where:

- Freshtel would be reasonably expected to use or disclose the personal information for a secondary purpose which is related to the primary purpose for which it collected the information (and directly related in the case of sensitive information);
- Freshtel has been given the consent of the person to whom the information relates for the personal information to be used or disclosed for the secondary purpose.
- Where there are reasonable grounds to believe that use or disclosure is necessary to prevent a threat to life or health;
- Where Freshtel suspects that unlawful activity is or has been engaged in and we use or disclose the personal information to investigate the suspected unlawful activity; or
- The use or disclosure is authorised by law or reasonably necessary to enforce the law.

Security of your personal information

Freshtel will take all reasonable steps to ensure that all personal information it collects, uses or discloses is stored in a secure environment accessed only

by authorized persons.

Freshtel will take reasonable steps to destroy personal information when it is no longer required for the purposes for which it was collected or for legal requirements.

Freshtel will properly dispose of all paper files, letters and any other hard copy documents that contain personal information that is no longer required.

All information stored in electronic form that is no longer needed will be deleted from our systems. While Freshtel employs advanced data encryption technology when interfacing with its customers, suppliers and other partners, users should be aware that there is a residual risk in transmitting any data electronically. This risk is inherent in all Internet dealings.

How to access, correct or update your information

Freshtel will take all reasonable steps to ensure that all information it collects, uses or discloses is accurate, complete and up-to-date. Please contact us if your details change or if you believe the information we have about you is not accurate or complete.

Freshtel will, on request, provide you with reasonable opportunity to access your personal information and have it corrected or updated. A fee may apply to such access.

Exceptions to your access rights include:

- Where providing access will pose a serious threat to the life or health or any individual or pose an unreasonable impact on the privacy of an individual;
- Your request for access is frivolous or vexatious;
- Where the information relates to existing legal proceedings between Freshtel and you and the information would not be discoverable in the process of those legal proceedings; or
- Where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of laws, or denying access is specifically authorised by law.

How to contact us

If you have an access request or if you have any questions or complaints about the manner in which your personal information has been collected or handled by us, please visit the Contact Us page (<http://www.freshtelholdings.com/about/contact/>) on this website.

Internet privacy

In addition to the provisions of the Freshtel Privacy Statement, this section further explains the management of personal information collected through your use of the

Freshtel or associated websites.

When you use this website our Internet Service Provider (ISP) may make a record of your visit and log your server address, your domain name, the date, time and duration of your visit, the pages and documents you accessed, the referring URL and the type of browser you are using. This information is collected for statistical purposes only, and Freshtel will not make any attempt to identify users according to their browsing activity.

In the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect our ISP's logs.

It is also possible that your ISP is logging your activity while you visit our site. This is beyond the control of Freshtel.

While you are visiting our site we may use cookies to facilitate a more personalised web browsing experience. Except where you volunteer personal or business information we will not procure information about you via any alternative means while you visit our site.

The Freshtel website contains links to websites of third party providers of goods and services. Such websites should contain their own privacy statements and Freshtel is not responsible for the privacy practices or content of any websites linked to this website.