

## Privacy Policy

Last updated: December 2023

### INTRODUCTION

Welcome to MY ISP Pty Ltd trading as Pineapple Net (ABN 12 644 398 603) (“**We**”, “**us**” and “**our**”). This Privacy Policy explains how and why we collect, use, hold, disclose, and protect your Personal Information.

By accessing or using our services or website you consent to the practices described in this Privacy Policy. Please read this policy carefully to understand our privacy practices.

### WHAT IS PERSONAL INFORMATION?

‘Personal information’ is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Examples include an individual’s name, address, contact number and email address.

‘Sensitive information’ is a special category of personal information. Sensitive information includes information about an individual’s racial or ethnic origin; political, religious, or philosophical beliefs; political, trade or professional memberships; sexual orientation or practices; criminal record; health information; genetic information; and biometric information that is used for the purpose of automated biometric verification or identification, and biometric templates.

### WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We collect Personal Information from you and about you when you interact with our website, marketing campaigns, services and/or when you contact us (e.g call us, send us an email or interact with us via social media).

The Personal Information we collect may include, but is not limited to:

- Name
- Contact information (e.g. email address, phone number)
- Date of birth
- Postal address
- Payment information
- Service-related details like your user name, encrypted password and service usage history, support incidents, enquiries and complaints
- Data Retention Law details (where that law applies) like subscriber and account details, service details, details about telecommunications devices, the source and destination of communications, the date and time of communications and connection to services, the type of a communication or service and location details.
- Other information you provide to us voluntarily

We collect Personal Information through various means, including but not limited to the following:

- When you register an account with us
- When you place an order or make a purchase
- When you engage our services
- When you participate in surveys, contests or promotions
- When you contact our customer support
- When you interact with our online ads on Google, Bing or social media.

We may also collect personal information about you indirectly from other sources, including:

- Our employees, agents, contractors, and suppliers
- Publicly available sources such as websites, social media platforms, internet or telephone directories
- Credit reporting agencies, credit providers, fraud checking agencies
- Our contractors and other representatives that you may deal with
- Third parties such as our business partners, your authorised representative/s and other organisations that we partner with and
- Other telecommunication and information service providers that we may interact with.

We do not collect sensitive information and we will only collect sensitive information about you with your consent (unless we are otherwise required or authorised by or under law to do so).

If you provide us with personal information about another person, please make sure that you tell them about this Privacy Policy.

## **COOKIES AND SIMILAR TECHNOLOGY**

We may use cookies and similar technology on our website to enhance your user experience. Cookies are small text files that are stored on your device when you visit our website. You can control the use of cookies through your browser settings.

We may also collect information about how you access, use, and interact with our website. We also use other tools such as Google Analytics to collect information about how you use, access and interact with website.

## **GOOGLE reCAPTCHA**

We also use reCAPTCHA which is a free service from Google that helps protect our digital platforms from spam and abuse by blocking automated software. It does this by collecting personal information about users to determine if they are humans and not spam bots.

This collection of personal information is subject to Google's privacy policy, for a copy please visit: <https://policies.google.com/privacy>. By using the reCAPTCHA service, you consent to the processing of data about you by Google in the manner and for the purposes set out in Google's privacy policy.

## **WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?**

We collect, hold, and use your Personal Information for a range of purposes so that we can:

- (a)** provide and improve our services;
- (b)** manage our relationship with you ;
- (c)** to communicate with you, respond to your enquires or complaints and provide you with support;
- (d)** to comply with our legal obligations and resolve disputes;
- (e)** identify and tell you about other services that we think may be of interest to you; and
- (f)** to consider you for current and future employment opportunities with our clients.

We may use your personal information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

If you do not provide us with your Personal Information, we may not be able to provide you with our services, , consider you for employment opportunities or respond to your enquiries.

## **HOW WE STORE AND HOLD PERSONAL INFORMATION**

We store most information about you in computer systems and databases (including cloud service providers) operated by either us or our external service providers.

We take reasonable steps to protect your Personal Information from unauthorised access, interference, disclosure, or destruction. We use secure encryption and follow industry best practices to safeguard your Personal Information and also require our service providers to do so.

We will also take reasonable steps to destroy or de-identify Personal Information that we no longer require.

While we strive to protect your Personal Information, we cannot guarantee its absolute security.

## **WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?**

We may disclose your Personal Information to our related companies (including DGTEK Pty Ltd).

We may disclose your Personal Information to external service providers so that they may perform services for us or on our behalf, including:

- Our contractors engaged to provision your connection and to resolve any faults concerning your service;
- Organisations authorised by us to conduct promotional, research and / or marketing services;
- To organisations that provide credit or finance to us;
- To our business partners and wholesale suppliers;
- Debt collection agencies and similar entities that assist with debt recovery; and
- Credit reporting bodies.

We may also disclose your Personal Information to others where:

- (a) We are required or authorised to do so by law;
- (b) You have expressly consented to the disclosure, or the consent may be reasonably inferred from the circumstances;
- (c) We need to share it with data processors to operate our business and provide you with our services; and
- (d) if the ownership or control of all or part of our business changes, the new owner and/or management;

## **DISCLOSE TO OVERSEAS RECIPIENTS**

Some of our service providers and related companies are located outside Australia. As a result, personal information collected and held by us may be transferred to recipients in other countries. In particular, we may disclose your personal information to one of our service providers located in Philippines or Sri Lanka.

## **ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION**

You may request access to or correction of Personal Information that we hold about you by contacting us directly. Our contact details are set out below.

We will generally provide you with access to your personal information (subject to some exceptions permitted by law).

There is no charge for requesting access to your Personal Information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct Personal Information in a reasonable time and will take all reasonable steps to ensure that the Personal Information we hold about you remains accurate, up-to-date and correct.

## **DIRECT MARKETING**

We may use your personal information so we can contact you with information about our services, promotions and events that may be of interest to you.

We may contact you by email, mail, text, social media, or telephone. You can let us know at any time if you no longer wish to receive these communications, by contacting us (using the contact details at the end of this policy) or using the opt-out/unsubscribe facility in our communications.

## **COMPLAINTS**

If you have any concerns or complaints about the way in which we have handled any privacy issue, including your request for access or correction of your Personal Information, please contact us. Our contact details are set out below.

We will consider your complaint and will respond within a reasonable period of time (usually 30 days).

If you are not satisfied with our response, you may contact us to further discuss your concerns or you may refer your complaint to the Office of the Australian Information Commissioner (OAIC) ([www.oaic.gov.au](http://www.oaic.gov.au)).

## **CONTACT DETAILS**

If you have any questions, comments, requests, complaints, or concerns, please contact us at:

Privacy Officer

Pineapple Net

3/ 15 Corporate Drive, Heatherton  
Victoria, 3202

[privacy@pineapple.net.au](mailto:privacy@pineapple.net.au)

1300 857 501

## **CHANGES TO THIS POLICY**

We may update this Privacy Policy from time to time. The updated version will be posted on our website with the effective date.