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# **Privacy Policy**

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**Adopted by:**

**Iberdrola Australia Limited**

**Adopted: 11 November 2021**

# Iberdrola Australia – Privacy Policy

The Iberdrola Australia Group comprises Iberdrola Australia Limited (ACN 105 051 616) (**IAL**) and its subsidiary entities (collectively “**Iberdrola Australia**”, “**we**”, “**us**” or “**our**”).

This Privacy Policy (**Policy**) applies to entities within the Iberdrola Australia Group with an Australian link, including IAL and its subsidiary entities.

We may update this Policy from time to time to reflect our current information handling practices, to take account of new laws and technologies or the changing business environment, and to reflect changes to our operations and practices. When we do so, the updated Policy will be available on our website: <https://iberdrola.com.au/> (**Website**). We recommend that you regularly visit our Website and review our Policy to ensure that you understand the terms that apply at the relevant time.

## *The Iberdrola Global Group*

IAL is a subsidiary of Spanish company Iberdrola Renovables Internacional, S.A.U., which is part of the Iberdrola, S.A. group of companies (collectively “**the Iberdrola Global Group**”). Iberdrola Global Group’s policies (including its [Personal Data Protection Policy](#) and [Binding Corporate Rules](#)) may also apply to the way in which your personal information is handled.

The Iberdrola Global Group is committed to protecting your privacy and to complying with all applicable personal data protection laws and regulations. Your personal information will be handled: in a lawful, fair and transparent manner; for specific and legitimate purposes; and, in a manner which is adequate, relevant and limited to what is necessary in relation to those legitimate purposes. The Iberdrola Global Group will strive to ensure that your personal information is accurate and remains up to date.

The Iberdrola Global Group has implemented technical and organisational measures to protect your personal information from accidental loss and from unauthorised or unlawful modification, access, use or disclosure, and has also established procedures to respond to any security incident that could affect your personal information.

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## **1. Commitment to Privacy**

- 1.1 Iberdrola Australia recognises its fundamental responsibility to protect the information of all individuals with whom it communicates and interacts, including its customers, business partners, website visitors and contractors. This is critical not only for the maintenance of our reputation but also to meet our legal and regulatory obligations. We are also committed to ensuring that our information handling processes are clear and transparent.
- 1.2 When Iberdrola Australia handles personal information, it is bound by the Australian *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**Privacy Principles**), together with any other applicable laws and regulations. This Policy details how Iberdrola Australia handles personal information in accordance with those obligations. It sets out the kinds of personal information we collect, how that information may be used and under what circumstances it may be disclosed.
- 1.3 This Policy does not apply to certain types of information which are not regulated by the Privacy Act, including employee records in relation to our current or former employees. However, where the personal information we have collected in relation to current or former employees is within the scope of the Privacy Act, this Policy will apply to that personal information.
- 1.4 If you are an employee of Iberdrola Australia accessing any Iberdrola Global Group Employee Portal, the Iberdrola Global Group privacy notice (available to view within the relevant Portal) will apply.

## **2. Why do we collect your personal information?**

- 2.1 Personal information is any information (including an opinion) which can be used to identify you. Sensitive information is a subset of personal information which includes (for example) information about race or ethnicity, political or religious beliefs, sexual preferences, criminal record and health information.
- 2.2 We only collect personal information that is reasonably necessary for us to conduct and operate our business. This may include personal information which we need to:
- 2.2.1 deliver products, services, information or advice to you or to an organisation you work for;
  - 2.2.2 interact with you, including via our website;
  - 2.2.3 establish or maintain a business or commercial relationship with you, including to:
    - (a) assess the suitability of your property for installation of infrastructure related to the generation of energy, including auxiliary infrastructure or energy storage systems;
    - (b) enter into an agreement with you in your capacity as a landowner or a customer;
    - (c) assess your suitability or better understand your preferences and expectations as a customer or business partner;
    - (d) assist you in using our products and services; or
    - (e) assess your suitability for employment with us, or for the provision of services to us as an independent contractor or an office holder, or if you are otherwise engaged by us;
  - 2.2.4 assess an application for a community grant or sponsorship, or host an event; or
  - 2.2.5 fulfil our legal and regulatory obligations from time to time.

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## **3. What personal information do we collect?**

- 3.1 The types of personal information we collect may include your:
- 3.1.1 name;
  - 3.1.2 address (including information about your property, such as lot and folio identifiers);
  - 3.1.3 identification information (including date of birth);
  - 3.1.4 contact details (e.g. phone and email) and emergency contact details (e.g. next of kin);
  - 3.1.5 personal details, such as your gender, marital status, citizenship or visa status;
  - 3.1.6 government identifiers (such as your driving licence, passport number or tax file number);
  - 3.1.7 employment information (such as your position description or title, place of employment);
  - 3.1.8 electricity usage information;

- 3.1.9 financial information;
- 3.1.10 travel details (such as a frequent flyer number);
- 3.1.11 enquiry/complaint details (including your opinion in some cases); and
- 3.1.12 other personal information, such as interactions or transactions we have with you, including any information you provide to us when you contact us by telephone, email or online (including via our social media platforms).

*Sensitive Information*

- 3.2 We generally do not need to collect sensitive information to operate our business, however, it may be necessary for us to collect sensitive information from time to time. For example, we may collect your health information:
  - 3.2.1 for health, safety and security reasons when you attend one of our sites, or attend an event (for example, in case of food preferences or an allergy, fitness for work, safety incidents and first aid/medical treatment);
  - 3.2.2 in connection with workplace incidents or accidents.
- 3.3 In some cases we may also collect information about your health or criminal history to assess your suitability for a role with us.

*Applicants for employment (including contractors and office holders)*

- 3.4 If you apply for a position with Iberdrola Australia we may collect information about your qualifications, experience and character. This may include reviewing your social media profiles. We may also conduct screening checks, for example in relation to: health; references; background; other directorships; financial probity (for example, bankruptcy checks); identity; eligibility to work (including citizenship, residency and immigration status, visa or passport details); vocational suitability; drugs/alcohol and criminal record checks.
- 3.5 Iberdrola Australia collects, uses and discloses this personal information to assess your application, conduct screening checks and consider and contact individuals regarding other positions. For example, Iberdrola Australia may exchange your personal information with academic institutions, recruiters, screening check providers, professional and trade associations, law enforcement agencies, referees and current and previous employers for the purpose of assessing your application. Without collecting and using this personal information Iberdrola Australia may be unable to process your application.

*Information collected via our website*

- 3.6 Iberdrola Australia may also collect information about you through your use of our Website, including your internet protocol (**IP**) address, the date and time of your visits, the web pages you accessed, any documents you downloaded, the type of browser and operating system used to access the Website and the domain name and country from which you request information. In some cases, Iberdrola Australia collects information regarding your use of our Website from third parties (for example, Google Analytics).
- 3.7 We also collect personal information you provide via the 'Contact Us' page of our Website. This may include your name and contact details (including your email address or phone number), and any other details you choose to provide (for example, it may include your opinions about a particular matter if you lodge a comment, query or complaint).
- 3.8 Any information we collect through your use of the Website may be used to help us improve our service to you, including by tailoring our products, services or Website to better suit your needs. If you contact us with a suggestion, comment or query, we may use your personal information to respond to you.

- 3.9 We may also collect, use or disclose information gathered via your use of the Website for related purposes, including disclosure to information technology companies, located locally or overseas, who assist us in constructing, designing and maintaining our Website.

*Cookies*

- 3.10 Iberdrola Australia may place a “cookie” (a small text file) on any computer you use to access this Website. A cookie is a small amount of data sent by our Website and stored on your computer’s hard drive. This allows Iberdrola Australia’s servers to recognise you when you visit the Website in the future. Most web browsers can be configured to not accept cookies or to notify you if a cookie is sent to you.

*Third party websites*

- 3.11 Please be aware that other websites that may be accessed through or linked to our Website may also collect your personal information. The information practices of any third-party websites linked to our Website are not covered by this Policy and you are solely responsible for protecting your personal information, passwords or any account information when accessing or using such third party sites.

*Electronic communications*

- 3.12 All emails, phone calls and other electronic communications sent to and from Iberdrola Australia (including via third party applications and services) may be automatically captured and retained in secure digital storage facilities.
- 3.13 These communications may be monitored, accessed, reviewed, audited and otherwise used for a variety of supervisory and compliance-related purposes, including to ensure compliance with applicable laws and regulations and other business controls. These communications may also be disclosed to third parties (such as enforcement bodies or regulatory authorities) in appropriate circumstances, including as authorised or required by law.

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**4. How do we collect personal information?**

- 4.1 Personal information is collected in a range of ways, including:
- 4.1.1 when you visit or use our Website, or otherwise contact us via email or phone;
  - 4.1.2 when you do business with us, including when you apply for or enquire in relation to our products or services, enter into a commercial or business arrangement with us, or attend our physical sites or an event we host;
  - 4.1.3 if you apply to be considered for a position with us or apply for a grant or scholarship we offer; and
  - 4.1.4 when you otherwise interact with us.
- 4.2 As long as it is reasonable and practicable for us to do so, we will only collect personal information about you directly from you. However, in some circumstances it may be necessary for us to access or collect information about you from a third party. For example:
- 4.2.1 where we need to verify information provided to us, including for the purpose of pre-employment background checks (such as criminal history checks);
  - 4.2.2 where we use a third party service provider to collect information on our behalf (for example, Survey Monkey or Google Analytics); or
  - 4.2.3 to comply with our regulatory obligations.

- 4.3 We will only collect sensitive information directly from you with your consent, or where we are required, authorised or otherwise permitted to collect the information by law.
- 4.4 Subject to any applicable laws, you may choose not to provide your personal information, including sensitive information, to Iberdrola Australia, or you may choose to deal with us on an anonymous basis (including by the use of a pseudonym) if it is practicable for you to do so. However, in most circumstances it will be impracticable for us to do business with you unless you provide us with your personal information.

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## **5. Use and disclosure of personal information**

- 5.1 Personal information we collect will generally be used or disclosed for the purposes for which it is collected, and for any other purpose which is related to that primary purpose and for which you might reasonably expect us to use it (including as described in this Policy).
- 5.2 In general, Iberdrola Australia uses and discloses personal information for the following purposes:
  - 5.2.1 to manage our business or commercial relationship with you, including to communicate with our contractors, suppliers and landowners;
  - 5.2.2 to provide products or services to you or your employer;
  - 5.2.3 to enable employees to undertake normal business activities as part of their role;
  - 5.2.4 to consider applications for employment, sponsorship and grants; and
  - 5.2.5 to comply with our legal obligations.
- 5.3 Your personal information may also be disclosed:
  - 5.3.1 between related bodies corporate within the Iberdrola Global Group located in Australia or overseas, and used by those entities for the same purposes for which we are entitled to use it; and
  - 5.3.2 to our third party service providers and business associates who provide services in connection with our products and services. These third parties may be located locally or overseas and may include service providers and specialist advisers who have been contracted to provide administrative, financial, information technology, marketing / business analysis or other services.
- 5.4 Iberdrola Australia may also disclose your personal information (including to overseas recipients):
  - 5.4.1 with your express consent;
  - 5.4.2 to insurers, lawyers, courts, tribunals and regulatory authorities (such as local councils, the Foreign Investment Review Board, Office of State Revenue (or equivalent in the relevant State or Territory), the Valuer General, the Australian Tax Office or the Australian Transaction Reports and Analysis Centre), and any other person where we are required, authorised or permitted to do so by law; or
  - 5.4.3 to any person specifically authorised by you to act on your behalf.
- 5.5 For more information about offshore disclosure of your personal information, see below.

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## **6. Disclosure of personal information to overseas recipients**

- 6.1 Subject to complying with certain safeguards set out in the Privacy Act, Iberdrola Australia may share personal information with its related companies in the Iberdrola Global Group or with other third parties located, or with operations, offshore as detailed at section 5 of this Policy above.
- 6.2 Entities to which your personal information may be disclosed by Iberdrola Australia are located in (without limitation) the European Union.

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## **7. Storage and security of information**

- 7.1 Personal information may be held by Iberdrola Australia or by third party service providers on our behalf. Iberdrola Australia takes reasonable steps to ensure that personal information is securely held by Iberdrola Australia and by any third party service provider that stores or has access to such information.
- 7.2 Iberdrola Australia holds personal information in various ways, including in hardcopy and in electronic form.
- 7.3 We use up-to-date techniques and processes to ensure the personal information which we hold is secure and is protected from misuse, interference, loss or unauthorised access, modification or disclosure. Access to personal information is generally restricted to authorised employees and contractors who require access in connection with their role, and where information is stored in electronic form technological protection controls are in place, including the use of firewalls and data encryption where appropriate.

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## **8. Accessing and correcting your personal information**

- 8.1 Iberdrola Australia takes reasonable steps, and has implemented appropriate technological and organisational measures, to assist in ensuring that the personal information it holds is accurate, up-to-date, complete, relevant and not misleading. However, personal information may change frequently with changes of address and personal circumstances, and Iberdrola Australia will promptly update personal information once notified that it is no longer correct.
- 8.2 You can request access to the personal information that we hold about you at any time. Iberdrola Australia will respond to such a request within a reasonable time and will try to give you full access to personal information in the manner you have requested, unless there is a legal or administrative reason we cannot do so. In some cases, we may charge a reasonable fee for providing access.
- 8.3 You may also request that the personal information we hold about you be corrected. Iberdrola Australia will correct personal information if requested by you or if errors are otherwise identified by Iberdrola Australia. If Iberdrola Australia believes the information it holds is incomplete or out of date, Iberdrola Australia may also seek to correct or complete its records by gathering data from other sources such as from public records. There is no charge payable in connection with a request for correction.

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## **9. Complaints**

- 9.1 You can make a complaint if you believe that we have breached our obligations under the Privacy Act or failed to comply with this Policy. Any complaint should be made in writing and sent to us using the contact details below.
- 9.2 Iberdrola Australia takes privacy-related complaints very seriously and will act promptly to respond to you as soon as possible, and generally within 30 days. Complaints will be treated confidentially and respectfully.
- 9.3 If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (**OAIC**). The OAIC will generally only consider your complaint if you have first written to us and given us a reasonable opportunity to resolve your complaint.

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## **10. Contact us**

- 10.1 You can contact Iberdrola Australia by mail, phone or email using the details below to:

- 10.1.1 seek more information or to request a copy of this Policy;
- 10.1.2 access, update or correct your personal information; or
- 10.1.3 make a privacy related complaint.

**Iberdrola Australia Limited Head Office**

Level 17, 56 Pitt Street

Sydney NSW 2000

Australia

**Email:** privacy@iberdrola.com.au

**Phone:** +61 8031 9900

**Attention:** Privacy Officer

- 10.2 More details about how to contact us are available on our Website:  
<https://iberdrola.com.au/home/contact/>

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