Privacy Policy

Version 2, effective 25 November 2026

Supersedes Version 1 dated 9 July 2026.

Emutel Pty Ltd ACN 652 579 023, ABN 68 652 579 023 (**EmuTel**, **we**, **us**, **our**) is committed to protecting your privacy. This policy explains how we collect, use, disclose and protect personal information, and how you can access or correct it or make a complaint. It covers our telecommunications, IT and software services, including emu.legal and emu.trade, and our websites. We comply with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles and, where they apply, the *Telecommunications Act 1997* (Cth) and the telecommunications consumer protection rules made under it.

1. The personal information we collect

We collect:

- your name, business name and ABN;
- contact details;
- date of birth and identification details;
- billing, payment, and bank or card details;
- credit information (see clause 6);
- service usage information, including call, message and data records, service and network information, IP addresses and device information;
- records of your communications with us, including emails, chat messages, call recordings, transcripts and summaries of them; and
- information collected through our websites (see clause 12).

You can make a general enquiry without identifying yourself. We may not be able to supply or bill a service without the information we need.

2. How we collect it

We collect personal information directly from you when you order, register, contact us or use our services; from your use of our services and network; when we record a call with you; and from third parties such as our suppliers and carriers, credit reporting bodies, your authorised representatives and public sources. Where it is reasonable and practicable, we collect it from you directly.

3. Why we collect and use it

We collect and use personal information to:

- supply, provision, manage and bill our services;
- verify your identity and assess your creditworthiness;
- provide customer support and handle complaints;
- operate, maintain and secure our network and systems;
- train our staff and improve our services;
- meet our legal and regulatory obligations, including to law enforcement and national security agencies and under data retention laws; and
- market our products and services where permitted (see clause 7).

4. How we use AI

We use a range of AI tools, including tools built into our email, phone, meeting, support and business systems, to transcribe, summarise, sort and help draft replies to communications with us. We do this to respond faster and keep accurate records. These tools are supplied by third-party technology providers, and the tools we use change over time. We require our providers to protect your information, and we do not allow them to use it to train AI models made available to others. We do use our own records, including communications with us, to build reference files and to train and improve AI tools that only EmuTel uses. We keep those files under the same security and retention rules as the records they come from. A person reviews AI output before we rely on it. AI is built into the systems we use to deal with everyone, so we cannot switch it off for an individual. To ask which tools apply to your information, or to raise a concern about how it is used, contact our Privacy Officer (see clause 16).

5. Automated decisions

People at EmuTel make the final decision on anything that significantly affects you. We do not use computer programs to make those decisions on their own. Our staff may use computer programs, including AI tools, to help them with decisions such as assessing a credit application, restricting or suspending a service for non-payment, and responding to

a complaint or hardship request. The kinds of personal information used are identity details, account and payment history, credit reports, service usage and your communications with us. You can ask us to explain or reconsider any of these decisions.

6. Credit information

We may collect, hold, use and disclose credit information under Part IIIA of the Privacy Act and the Privacy (Credit Reporting) Code. This can include obtaining credit reports about you and disclosing information to credit reporting bodies, to assess an application, manage your account or collect overdue payments.

7. Direct marketing and your choices

We may use your contact details to tell you about our products and services. You can opt out at any time by using the unsubscribe link or contacting us. We do not use sensitive information for marketing without your consent. We do not sell personal information.

8. Who we disclose it to

We may disclose personal information to:

- carriers, wholesalers and suppliers, such as NBN Co and our network and voice suppliers;
- technology providers that host, process or support our systems, including cloud, communications, AI and analytics providers;
- payment processors and financial institutions;
- credit reporting bodies and debt collection agencies;
- our professional advisers, insurers and contractors;
- the Telecommunications Industry Ombudsman and relevant regulators; and
- law enforcement or government agencies where required or authorised by law.

We require our service providers to protect the information and to use it only for the purpose we gave it to them.

9. Sending information overseas

Some of our technology providers, including cloud, communications, AI and analytics providers, store or process information outside Australia. The countries are likely to include the United States, the United Kingdom and other countries where those providers operate. We take reasonable steps to make sure overseas providers handle your information consistently with the Australian Privacy Principles.

10. Information we handle for our customers

Some of our business customers use our phone, IT and software services to handle information about their own clients, staff and contacts. We handle that information on our customer's behalf and under our agreement with them. If you have a question about information a business holds about you, please contact that business first.

11. How we keep it secure

We use reasonable physical, electronic and procedural safeguards to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. When we no longer need information and are not required by law to keep it, we take reasonable steps to destroy or de-identify it.

12. Cookies and website analytics

Our websites use cookies and analytics tools to understand how they are used, including your IP address, device and browser, and the pages you visit. You can turn cookies off in your browser, but some features may not work properly.

13. Accessing and correcting your information

You can ask for access to the personal information we hold about you, and ask us to correct it if it is inaccurate, out of date, incomplete, irrelevant or misleading. Contact our Privacy Officer (see clause 16). We will respond within a reasonable time. We may decline a request in the limited circumstances the law allows, and will tell you why.

14. Complaints

If you have a privacy complaint, contact our Privacy Officer (see clause 16). We will acknowledge and investigate it. Our general complaints process is at emutel.com.au/policies/complaints. If you are not satisfied, you can contact the Office of the Australian Information Commissioner at oaic.gov.au or on 1300 363 992. For a complaint about a telecommunications service, you can also contact the Telecommunications Industry Ombudsman at tio.com.au.

15. Changes to this policy

We may update this policy from time to time. The current version, with its version number and date, is always on our website. If we make a significant change to how we handle your information, we will tell you.

16. Contact us

Privacy Officer, EmuTel Pty Ltd
Unit 4/2 Riedell St, Wagga Wagga NSW 2650

Phone: 1800 368 835

Email: privacy@emutel.com.au

emutel

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Complaints

Standard Rates

Complaint Handling Policy

Financial Hardship Policy

Customer Service Guarantee

Acceptable Use Policy

Privacy Policy

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