

## 1. RESPECTING YOUR PRIVACY

Energy Synapse Pty Ltd ABN 34 616 603 082 (together “Energy Synapse, we, us, our”) understands its client’s concern about the privacy of their personal information when collected by us.

Our Privacy Policy describes how we handle your personal information. It outlines:

- the kinds of personal information we collect;
- how that information is held;
- how that information may be used;
- to whom we permit access;
- how we protect that information;
- your right to access and seek correction of it; and
- how you may complain about privacy matters.

This Privacy Policy is part of our ongoing commitment to the protection of our client’s privacy.

We are dedicated to protecting the confidentiality and security of the personal information which we collect about you and do so in accordance with the *Privacy Act 1988* including the Australian Privacy Principles (**Privacy Legislation**). This dedication extends to information or opinions that are collected about an individual in circumstances where their identity can reasonably be determined.

If you have any questions about this policy, please contact our Privacy Officer, whose details are below.

More information about privacy law and privacy principles is available from the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## 2. WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The kinds of information we collect and hold may include your personal details such as your name and basic contact details including your phone number and email address. It is unlikely that we will collect your sensitive information (such as information relating to health, disability, ethnic origin, criminal convictions, religious or political affiliation) but if we do so we will only collect it in accordance with the Privacy Legislation.

We require personal information to provide you with services. The reason for this is because your identity is a relevant factor creating a legally binding arrangement. It is material to our decision of whether or not to enter into agreements with you.

## 3. HOW DO WE COLLECT PERSONAL INFORMATION?

We collect your personal information directly from you when you provide information by sending us a message, email, online request, phone or in documents.

## 4. ANONYMITY AND PSEUDONYMITY

Where lawful, individuals may interact with Energy Synapse anonymously or using a pseudonym. However, as the nature of our services requires us to identify the individuals and organisations we contract with, anonymous interaction is not practicable in any of our service delivery contexts.

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## **5. HOW DO WE HOLD PERSONAL INFORMATION?**

Personal information we hold is stored in secure cloud environments. These environments are operated by trusted third-party service providers, including:

- Amazon Web Services (AWS): cloud infrastructure and hosting for the Energy Synapse Platform. Where available, Australian data regions are utilised to minimise cross-border data transfers.
- FreshSales: customer relationship management (CRM) system.
- Mailchimp (Intuit): email mass communication platform used to manage and distribute Energy Synapse company newsletter to subscribers and also relevant news and updates about the Energy Synapse Platform to paid subscribers of the Energy Synapse Platform.
- Microsoft (Microsoft 365): email, communication, and productivity tools including Outlook and Teams, used for internal operations and client communications.
- Okta: identity and access management, used to control and authenticate access to the Energy Synapse Platform.
- Tableau: data visualisation and analytics tools used in the delivery of the Energy Synapse Platform.
- Vodien: web hosting provider for the Energy Synapse public website, which may hold information submitted via website enquiry forms.
- Xero: accounting and billing software used to manage client invoicing and financial records.

## **6. HOW DO WE USE PERSONAL INFORMATION?**

We use your personal information that is reasonably necessary for our functions and activities.

We may use your personal information to:

- identify you;
- provide you our services;
- administer and manage those services, including charging, billing and collecting debts;
- inform you of ways the services provided to you could be improved;
- assist in investigating your complaints and enquiries;
- research and develop our services using third party services;
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;

- promote services that may be of interest to you. You may opt out of marketing communications at any time by using the unsubscribe link included in every communication.
- assist statistical, actuarial or research analysis as we consider is necessary for business purposes.

#### Disclosure Of Information

The information collected will be used or disclosed by us for the primary purposes listed above and for the secondary purposes related to those purposes, but only if you would expect us to use or disclose the information for such secondary purpose.

We may use new technologies from time to time and personal information may be stored outside Australia. We will not transfer personal information to a recipient in a foreign country unless we have appropriate protections in place as required by the relevant privacy laws. Your information will be stored on our data base for such period of time as required by law.

### **7. HOW WE PROTECT PERSONAL INFORMATION?**

We will take all reasonable steps to protect the information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. When information is no longer needed we will destroy or de-identify it.

We require our employees to protect the confidentiality of information as required by the Privacy Legislation. Access to information by our employees is limited to administering, offering, servicing, processing or maintaining of our services. We also maintain physical, electronic and procedural safeguards designed to protect information. When we share or provide information to other persons or organisations, we contractually obligate them, if required by law, to treat information as confidential and conform to our privacy policy and applicable laws and regulations.

### **8. NOTIFIABLE DATA BREACHES**

Where Energy Synapse handles personal information under a contract with a Commonwealth government agency, it is subject to the Notifiable Data Breaches (NDB) scheme under Part IIIIC of the Privacy Act 1988 (Cth) in relation to that information. In the event of an eligible data breach affecting government contract data, Energy Synapse will:

- Contain the breach and assess its nature and scope as quickly as practicable, and in any event within 30 days of becoming aware of the suspected breach. Where a breach originates with a third-party service provider, Energy Synapse will work with that provider to understand the scope and impact of the breach as quickly as possible.
- Notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable after determining the breach is eligible.
- Notify affected individuals, or where that is not practicable, publish a notification on our website.

- Notify the relevant client organisation promptly so they can take appropriate action.

For all other clients, Energy Synapse will take all reasonable steps to contain any suspected data breach and will notify affected clients promptly where their personal information may have been compromised.

## **9. HOW CAN YOU ENQUIRE ABOUT, ACCESS AND CORRECT YOUR PERSONAL INFORMATION?**

We will provide you with access to any of your personal information we hold (except in limited circumstances recognised by law). You may request access to the information which we hold about you and request its correction if you believe it to be incorrect. We can also correct your information if we are satisfied that it is incorrect. We may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

If you wish to access or correct your information, please write to our Privacy Officer at:

Privacy Officer  
Energy Synapse Pty Ltd  
Email: [info@energysynapse.com.au](mailto:info@energysynapse.com.au)

## **10. HOW CAN YOU COMPLAIN ABOUT OUR MANAGEMENT OF PERSONAL INFORMATION?**

If you wish to complain about our management of your personal information, you may access our internal dispute resolution process by contacting our Privacy Officer. We may ask you to put your complaint in writing and to provide details about it. We may discuss your complaint with our personnel and our service providers and others as appropriate. If you are not satisfied with the outcome of our investigation, you may lodge your complaint with the Office of the Australian Information Commissioner.

Office of the Australian Information Commissioner  
GPO Box 5218  
SYDNEY NSW 2001  
Telephone: 1300 363 992  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **11. UPDATES**

This privacy policy is current as of the date below. We may change it from time to time. If we do change it we will publish the updated version from which point the updated version will apply to all information collected or held thereafter.

1 June 2026